

Mr. Don Lemons
Cargill, Inc.
P.O. Box 307
Seymour, IN. 47274

Re: SMF 071-9124
First Significant Modification to
FESOP 071-5752-00013

Dear Mr. Lemons:

Cargill, Inc. was issued a permit on December 6, 1996 for a granulated lime fertilizer manufacturing plant. A letter requesting changes to this permit was received on October 16, 1997. Pursuant to the provisions of 326 IAC 2-8-11, a significant modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following:

- (a) An increase in the existing screening operations throughput by 15 tons per year.
- (b) Modified pressure drop ranges for the following existing control devices:
 - 1. Wet scrubber, designated as WS2, originally had a pressure drop range of 4.0 to 8.0 inches of water is revised to 7.0 to 13.0 inches of water.
 - 2. Baghouse, designated as BH1, originally had a pressure drop range of 2.0 to 6.0 inches of water is revised to 7.0 to 14.0 inches of water.
 - 3. Baghouse, designated as BH2, originally had a pressure drop range of 2.0 to 6.0 inches of water is revised to 5.0 to 10.0 inches of water.
- (c) FESOP rules promulgated since the issuance of this FESOP and are now applicable to the source. The promulgated rules are as follows:
 - 1. Enhanced New Source Review [326 IAC 2];
 - 2. Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)];
 - 3. Stack Height [326 IAC 1-7];
 - 4. Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M];
 - 5. Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140];
 - 6. Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]; and
 - 7. Compliance with 40 CFR 82 and 326 IAC 22-1.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, of my staff, at the above address; or by phone at 317-233-6875 or 1-800-451-6027 (ext 3-6875).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Jackson County
U.S. EPA, Region V
Jackson County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

**Cargill, Inc.
101 Agrico Lane
Seymour , Indiana 47274**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F071-5752-00013	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 6, 1996
First Significant Permit Modification: SMF071-9124	Pages Affected: 2, 3, 4, 5, 15a, 16a, 17a, 18, 20, 21, 21a, 22, and 22a-b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS		
Section	Description	Page No.
	COVER PAGE	1
	TABLE OF CONTENTS	2
A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(c)]	
A.2	Emission Units and Pollution Control Devices [326 IAC 2-8-3(c)]	
A.3	Insignificant Activities [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
B	GENERAL CONDITIONS	6
B.1	General Requirements [IC13-15] [IC 13-17]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement & Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]	
B.14	Emergency Provision [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation, Reissuance and Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-3(h)] [326 IAC 2-8-8(a)] [326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)]	
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]	
B.22	Operational Flexibility [326 IAC 2-8-15]	
B.23	Construction Permit Requirement [326 IAC 2-1]	
B.24	Inspection and Entry [326 IAC 2-8-5(a)(2)]	
B.25	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	
B.26	Enhanced New Source Review [326 IAC 2]	

TABLE OF CONTENTS		
Section	Description	Page No.
C	SOURCE OPERATION CONDITIONS	16
D.1	FACILITY OPERATION CONDITIONS	21
	One fertilizer processing line	
D.2	FACILITY OPERATION CONDITIONS	22a-b
	Screening Operations	
	FORMS	
	Certification Form	23
	Deviation Forms (2)	24, 25
	Total Number of Permit Pages	25
	Total Number of Forms	3
	Technical Support Document	9
	Emissions Calculations	3

SECTION A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates a granulated lime fertilizer manufacturing plant.

Responsible Official: John W. Bryant
Source Address: 101 Agrico Lane, Seymour, Indiana 47274
Mailing Address: P.O. Box 307, Seymour, Indiana 47274
SIC Code: 2874
County Location: Jackson
County Status: Attainment for all criteria pollutants
Source Status: Synthetic Minor Source, FESOP Program

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

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

One fertilizer production line consisting of the following:

- (a) One (1) granulator, identified as EU-01, with a maximum rated capacity of 30 tons per hour, and emissions controlled by a wet scrubber, identified as WS1, and exhausting at stack S1.
- (b) One (1) dryer, identified as EU-02, with a maximum rated capacity of 30 tons per hour, and emissions controlled by two cyclones, identified as Cycl1 and Cycl1A, which split the air then go on to a wet scrubber, identified as WS2, and exhausting at stack S2.
- (c) One (1) cooler, identified as EU-03, with a maximum rated capacity of 30 tons per hour, and emissions controlled by a baghouse, identified as BH2, and exhausting to general ventilation.
- (d) One (1) natural gas fueled burner for the dryer, identified as EU-04, rated at 16 million Btu per hour, exhausting at stack S2.
- (e) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, designated as EU-05, with a maximum throughput of 30 tons/hr, controlled by cyclones designated as 2A and 2 and a baghouse designated as BH1 and exhausts through the general ventilation system.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (3) Paved and unpaved roads and parking lots with public access.
- (4) Purge double block and bleed valves.
- (5) Other categories with emissions below insignificant thresholds.

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

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

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

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

C.5.1 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.5.2 Stack Height [326 IAC 1-7]

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

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

C.5.3 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]

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

C.9.1 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
- (3) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d)The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

(e)Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f)Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

parameter within the the prescribed time will constitute a violation of the permit unless taking the corective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the permittee may be excused from taking further corrective action for any of the following reasons:

- (a)Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or
- (b)The permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
- (c)An automatic measurement was taken when the process was not operating; or
- (d)The permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an "emergency" as defined in 326 IAC 2-8-12 (Emergewncy Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

C.11Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

(a)Submit:

- (1)A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR

68.10(a); or

(2)As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3)A verification to IDEM, OAM, Jackson County Health Department, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

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

C.12Monitoring Data Availability

All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or

C.14General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b)Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if:

(1)Delivered by U.S. mail and postmarked on or before the date it is due; or

(2)Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.

(c)All instances of deviations from any requirements of this permit must be clearly identified in such reports.

(d)Any corrective actions taken as a result of an exceedance of a limit, as excursion from the parametric values, or a malfunction that may caused excess emissions must be clearly identified in such reports.

(e)The first report shall cover the period commencing the date of issuance of this permit and ending March 31, 1997.

C.14.1Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a)Persons opening appliances for maintenance, service, repair or disposal must comply with the

required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

One fertilizer production line consisting of the following: One (1) granulator, identified as EU-01, with emissions controlled by a wet scrubber, identified as WS1, and exhausting at stack S1; one (1) dryer identified as EU-02, with emissions controlled by two cyclones, identified as Cycl1 and Cycl1A, which split the air then go on to a wet scrubber, identified as WS2, and exhausting at stack S2; one (1) cooler, identified as EU-03, with emissions controlled by a baghouse, identified as BH2, and exhausting to general ventilation; and one (1) natural gas fueled burner for the dryer, identified as EU-04, rated at 16 million Btu per hour, exhausting at stack S2.

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

D.1.1 Particulate Matter less than ten microns (PM-10)

The PM10 emissions from the fertilizer production facilities shall be limited as follows: the granulator, EU-01, shall be limited to 0.159 grains per dry standard cubic foot (13.83 pounds per hour), the dryer, EU-02, shall be limited to 0.032 grains per dry standard cubic foot (6.8 pounds per hour), and the cooler, EU-03, shall be limited to 0.00015 grains per dry standard cubic foot (0.10 pounds per hour). Compliance with this condition and condition D.1.4 and D.1.5 will make 326 IAC 2-7 not applicable.

D.1.2 Opacity Limitations

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), visible emissions from the fertilizer processing line shall meet the following:

- (a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings,
- (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

D.1.3 The burner for the dryer, EU-04, rated at 16 million Btu per hour shall use only natural gas as fuel.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 of this permit, is required for units EU-01, EU-02, EU-03 and EU-04.

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

D.1.5 Pressure Drop Readings

The Permittee shall take reading to the total static pressure drop across the baghouse controlling EU-03, at least once per day when the cooler is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 5.0 and 10.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.9 - Pressure Gauge Specification, be subject to approval by IDEM, OAM, and be calibrated at least once every six (6) months.

D.1.6 Pressure and Water Flow Rate Readings

The Permittee shall take pressure, scrubbing liquid and make-up water flow rate reading from the scrubbers controlling EU-01 and EU-02, at least once per day when the granulator and dryer are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop range across the scrubber, designated as WS1, shall be maintained within the range of 0.5 to 4.0 inches of water and the pressure drop across the scrubber, designated as WS2, shall be maintained within the range of 7.0 to 13.0 inches of water. The scrubbers shall have a scrubbant flow rate of 175 gallons of water per minute and make-up water flow rate minimum of 6.0 gallons per minute, or at ranges and flow rates established during the latest stack test. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure readings or flow rates are outside of the above mentioned ranges for any one reading.

The instrument used for determining the pressure shall comply with condition C.9 - Pressure Gauge Specification, be subject to approval by IDEM, OAM, and be calibrated at least once every six (6) months.

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

D.1.7 Daily Visible Emissions Notations

Daily visible emission notations of the granulator, cooler and dryer operations stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.8 Control Equipment

The operating parameter ranges from each control unit in condition D.1.5 and D.1.6 shall be monitored and recorded daily, and maintained for a period of at least five years from the date of monitoring.

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the granulator, dryer and cooler shall not exceed 39.95 pounds per hour, when operating at a process weight rate of 30 tons per hour.

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

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

SECTION D.2 FACILITY OPERATION CONDITIONS

- (a) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, designated as EU-05, with a maximum throughput of 30 tons/hr, controlled by cyclones designated as 2A and 2 and a baghouse designated as BH1 and exhausts through the general ventilation system.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the screening operations shall not exceed 39.95 pounds per hour when operating at a process weight rate of 30 tons per hour.

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

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-3(c)(6)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of the FESOP, is required for these screening operations and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements

D.2.4 Particulate Matter (PM)

The Baghouses for PM control shall be in operation at all times when the screening operations are in operation and exhausting to the outside atmosphere.

D.2.5 Visible Emissions Notations

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

D.2.6 Baghouse Requirements

- (a) The Permittee shall take readings of the total static pressure drop across the baghouse, at least once per day. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 7.0 and 14.0 inches of water. The Preventive Maintenance Plan for these baghouse shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.
- (b) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) The gauge employed to take the pressure drop across the baghouse or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the visible emissions notations required under Condition D.2.5.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the total static pressure drop required under Condition D.2.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the FESOP permit.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document for First Significant Permit Modification of the Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Cargill, Inc. Eastern Fertilizer Region
Source Location:	Highway 50 East, Seymour, Indiana 47274
County:	Jackson
Permit No.:	F-071-5752-00013; Issued: December 6, 1996
Revision No.:	SMF-071-9124-00013
SIC Code:	2874
Permit Reviewer:	Nysa L. James

History

On December 6, 1996, Cargill, Inc. Eastern Fertilizer Region was issued a FESOP, F-071-5752-00013. The following changes shall be considered a First Significant Modification to the existing FESOP source.

Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Cargill, Inc. Eastern Fertilizer Region, relating to the requested revisions of their FESOP and is proposing the following changes:

1. Condition A.2, Emissions Units and Pollution Control Summary section, is revised to include the increase of the existing screening operations throughput (changes are bolded and crossed out for emphasis):
 - (e) **One (1) product sizing and transfer process of granulated lime, designated as EU-04, with a maximum throughput of 30 tons/hr, controlled by cyclones designated as 2A and 2 and a baghouse designated as BH1 and exhausts through the general ventilation system.**
 - (f) **One (1) screen and classifying process of granulated lime, designated as EU-05, with a maximum throughput of 30 tons/hr, controlled by cyclones designated as 2A and 2 and a baghouse designated as BH1 and exhausts through the general ventilation system.**
2. Due to the increase of the existing screening operations throughput, Condition B.26, Enhanced New Source Review [326 IAC 2] section is added on page 15a of 25 and reads as follows (changes are bolded and crossed out for emphasis):

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

3. Condition C.5.1, Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)] section, which applies to all FESOP sources, is added on page 16a of 25 and reads as follows (changes are bolded and crossed out for emphasis):

C.5.1 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

4. Condition C.5.2, Stack Height [326 IAC 1-7] section, which applies to all FESOP sources with potential emissions of 25 tons per year or more, is added on page 16a of 25 and reads as follows (changes are bolded and crossed out for emphasis):

C.5.2 Stack Height [326 IAC 1-7]

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

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

5. Condition C.5.3, Asbestos Abatement Project [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140] section, which applies to all FESOP sources, is added on page 16a of 25 and reads as follows (changes are bolded and crossed out for emphasis):

C.5.3 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

6. Condition C.9.1, Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] section, which applies to all FESOP sources, is added on page 17a of 25 and reads as follows (changes are bolded and crossed out for emphasis):

C.9.1 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
 - (2) If there is a change in the following:**
 - (A) Asbestos removal or demolition start date;**
 - (B) Removal or demolition contractor; or**
 - (3) Waste disposal site.**
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

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

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

7. Condition C.11.1, Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215] section, which applies to all FESOP sources, is added on page 18a of 25 and reads as follows (changes are bolded and crossed out for emphasis):

C.11.1 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

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

8. Condition C.14.1, Compliance with 40 CFR 82 and 326 IAC 22-1 section, which applies to all FESOP sources, is added on page 20 of 25 reads as follows (changes are bolded and crossed out for emphasis):

C.14.1 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

9. Section D.1 Facility Description, on page 21 of 25, is revised as follows (changes are bolded and crossed out for emphasis):

One fertilizer production line consisting of the following: One (1) granulator, identified as EU-01, with emissions controlled by a wet scrubber, identified as WS1, and exhausting at stack S1; one (1) dryer, identified as EU-02, with emissions controlled by two cyclones, identified as Cycl1 and Cycl1A, which split the air then go on to a wet scrubber, identified as WS2, and exhausting at

stack S2; one (1) cooler, identified as EU-03, with emissions controlled by ~~two cyclones, identified as Cycl2 and Cycl2A, which split the air then go on to a baghouse, identified as BH1 a~~ **baghouse, identified as BH2**, and exhausting to general ventilation; and one (1) natural gas fueled burner for the dryer, identified as EU-04, rated at 16 million Btu per hour, exhausting at stack S2.

10. Condition D.1.1, Particulate Matter less than ten microns (PM-10), on page 21 of 25, is revised as follows (changes are bolded and crossed out for emphasis):

Particulate Matter less than ten microns (PM-10)

The PM10 emissions from the fertilizer production facilities shall be limited as follows: the granulator, EU-01, shall be limited to 0.172 grains per dry standard cubic foot (14.92 pounds per hour), the dryer, EU-02, shall be limited to 0.034 grains per dry standard cubic foot (7.34 pounds per hour), and the cooler, EU-03, shall be limited to 0.00055 grains per dry standard cubic foot (0.117 pounds per hour). Compliance with this condition and condition D.1.3 and D.1.5 will make 326 IAC 2-7 not applicable ~~and satisfies 326 IAC 6-3.~~

11. Condition D.1.1a, Particulate Matter (PM) [326 IAC 6-3], on page 21a of 25, is added as follows (changes are bolded and crossed out for emphasis):

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the granulator, dryer and cooler shall not exceed 39.95 pounds per hour, when operating at a process weight rate of 30 tons per hour.

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

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

12. Condition D.1.5, Pressure Drop Readings, on page 21 of 25, is revised as follows (changes are bolded and crossed out for emphasis):

The Permittee shall take reading to the total static pressure drop across the baghouse controlling EU-03, at least once per day when the cooler is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of ~~2.0 and 6.0~~ **5.0 and 10.0** inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

13. Condition D.1.6, Pressure and Water Flow Rate Readings, on page 22 of 25, is revised as follows (changes are bolded and crossed out for emphasis):

The Permittee shall take pressure, scrubbing liquid and make-up water flow rate reading from the scrubbers controlling EU-01 and EU-02, at least once per day when the granulator and dryer are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop ~~range~~ across the scrubbers, **designated as WS1**, shall be maintained within the range of 4.0 to 8.0 inches of water **and the pressure drop across the scrubber, designated as WS2, shall be maintained within the range of 7.0 to 13.0 inches of water.** ~~with~~ **The scrubbers shall have a** scrubbant flow rate of 175 gallons of water per minute and make-up water flow rate minimum of 6.0 gallons per minute, or at ranges and flow rates established during the latest stack test. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure readings or flow rates are outside of the above mentioned ranges for any one reading.

14. Section D.2, Facility Description, on pages 22a-b, is added to include the existing screening operations.

Enforcement Issue

None.

Recommendation

The staff recommends to the Commissioner that the modification be approved.

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

A registration is being issued separately to satisfy the permitting requirements under 326 IAC 2-1-3.2.

Emissions Calculations (PM = PM₁₀ for the emission calculations below)

Product Sizing and Transfer: (An increase from 15 tons/hr to 30 tons/hr)

(i) Before Control PM₁₀ (PM) Emissions = 15 tons/hr * 0.06 lb PM₁₀ (PM)/ton = 0.9 lb/hr; 0.9 lb/hr * 8760 hrs/yr / 2000 lb/ton = **3.95 ton/yr.**

(ii) After Control PM₁₀ (PM) Emissions = 3.95 tons/yr * (1-.999) = **0.00395 tons/yr.**

Screening and Classifying: (An increase from 15 tons/hr to 30 tons/hr)

(i) Before Control PM₁₀ (PM) Emissions = 15 tons/hr * 0.06 lb PM₁₀ (PM)/ton = 0.9 lb/hr; 0.9 lb/hr * 8760 hrs/yr / 2000 lb/ton = **3.95 ton/yr.**

(ii) After Control PM₁₀ (PM) Emissions = 3.95 tons/yr * (1-.999) = **0.00395 tons/yr.**

Total Potential and Allowable Emissions - Screening Operations

Pollutant	Allowable Emissions		Potential Emissions	
	(lb/day)	(ton/yr)	(lb/day)	(ton/yr)
PM	981.36	179.10	43.29	7.9
SO ₂	--	--	--	--
VOC	--	--	--	--
CO	--	--	--	--
NO _x	--	--	--	--
Single HAPs	--	--	--	--
Combination of HAPs	--	--	--	--

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3-2(c).

The allowable PM emissions shall be determined from the total throughput of 30 tons/hr.

The screening operations shall not exceed 39.95 pounds per hour, when operating at a process weight rate of 30 tons per hour.

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

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

The source complies with 326 IAC 6-3-2 because the potential emissions based on total throughput of 30 tons/yr are less than allowable emissions of 179.10 tons/yr.

- (b) The potential before control emissions based on the rules cited are less than the allowable emissions, therefore, the potential before control emissions are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of PM are less than 25 tons per year, but greater than 25 pounds per day. Therefore, pursuant to 326 IAC 2-1, a registration is required.

County Attainment Status

- (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. Jackson 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 and 40 CFR 52.21.

- (b) Jackson County has been classified as attainment or unclassifiable for PM, NO_x, SO₂ and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited PTE

The source has accepted a federally enforceable PM₁₀ limit of 99.0 tons per year.

The screening operations increased the throughput by 15 tons/hr. Therefore, the modification includes only the increase in throughput.

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)	Single HAP (ton/yr)	Combo HAPs (ton/yr)
Proposed Modification	0.0079	0.0079	--	--	--	--	--	--
Existing FESOP Limits F-141-5555, issued on December 11, 1996	99	99	99	99	99	99	9	24
Revised FESOP Limits	99	99	99	99	99	99	9	24
Title V Significant Levels	99	99	99	99	99	99	9	24
Note: This source will be able to keep its FESOP status.								

Federal Rule Applicability

There are no changes in Federal rule applicability from the original FESOP.

State Rule Applicability

Since the screening operations shall be added as section D.2 under the facility operation conditions, 326 IAC 6-3 shall apply to the screening operations and shall increase the total source allowable PM emissions.

Compliance Monitoring

The screening operations shall have applicable compliance monitoring conditions as specified below:

- (a) The baghouse, designated as BH1, for PM and PM₁₀ control shall be in operation at all times when the screening operations are in operation and exhausting to the outside atmosphere.

- (b) Daily visible emission notations of the screening operations stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (c) The Permittee shall take readings of the total static pressure drop across the baghouses, at least once per day. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 7.0 and 14.0 inches of water. The Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.
- (d) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (e) The gauge employed to take the pressure drop across the baghouses or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

Air Toxic Emissions

- (a) None of these listed air toxics will be emitted from this proposed modification.
- (b) 326 IAC 2-1-3.4 does not apply to this facility because there are no HAPs emissions.

Conclusion

The modification of this source shall be subject to the conditions of the attached proposed FESOP Minor Modification Permit No. SMF-071-9124-00013.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Cargill, Inc.
Source Location: 101 Agrico Lane, Seymour, IN. 47274
County: Jackson
FESOP No.: F-071-5752-00013
Significant Modification No.: SMF-071-9124-00013
SIC Code: 2874
Permit Reviewer: Nysa L. James

On May 13, 1998, the Office of Air Management (OAM) had a notice published in the Seymour Daily Tribune, 303 W. 2nd Street, Seymour, Indiana, stating that Cargill, Inc. had applied for the first significant modification to the existing FESOP 071-5752-00013, with control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 9, 1998, Cargill, Inc. submitted comments on the proposed FESOP modification. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 1: The source name is listed as Cargill, Inc. Eastern Fertilizer Region in the application. The Eastern Fertilizer Region no longer exists. This should be listed as Cargill, Inc.

Response 1: The Office of Air Management (OAM) has changed accordingly in the FESOP modification.

Comment 2: The source location is listed as Highway 50 East, Seymour, Indiana 47274 in the application. The actual physical address has changed to 101 Agrico Lane, Seymour, Indiana 47274 as part of the reorganization for Jackson County 911 installation.

Response 2: OAM has changed accordingly.

Comment 3: The responsible official is listed as Burnie Wilhelm in the application. The locally responsible official for the FESOP certifications is John W. Bryant, US Operations Superintendent.

Response 3: OAM has changed accordingly.

Comment 4: In Section C.11.1 (a)(3) and (b) of the FESOP modification require that reporting regarding a Risk Management Plan be submitted to St. Joseph County Health Department. It is our understanding that since we do not have a local air regulatory, that local reporting is not necessary.

Response 4: Risk Management Plan is required for any substance present in more than the threshold quantity that is regulated under 40 CFR 68. Condition C.11, originally C.11.1, shall be amended as follows (changes are bolded and crossed out for emphasis):

C.11.4 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

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

Comment 5: Section A.2(e), the product sizing and transfer process of granulated lime is not part of EU-04. The product sizing and transfer process of granulated lime should be part of EU-05. Section A.2(e) and (f) are the same process.

Response 5: Condition A.2 and Condition D.2, Emission Units and Pollution Control Devices and Facility Description, shall be amended as follows (changes are bolded and crossed out for emphasis):

- (e) One (1) ~~product sizing and transfer~~ **screen and classifying** process of granulated lime, **consisting of product sizing and transfer**, designated as ~~EU-04~~ **EU-05**, with a maximum throughput of 30 tons/hr, controlled by cyclones designated as 2A and 2 and a baghouse designated as BH1 and exhausts through the general ventilation system.
- (f) ~~One (1) screen and classifying process of granulated lime, designated as EU-05, with a maximum throughput of 30 tons/hr, controlled by cyclones designated as 2A and 2 and a baghouse designated as BH1 and exhausts through the general ventilation system.~~

Comment 6: Section D.1.6 refers to the pressure drop range across the scrubber, designated as WS1, shall maintain within a range of 4.0 to 8.0 inches of water. This monitoring criteria was changed to 0.5 to 4.0 inches of water in the Administrative Amendment issued to Cargill, Inc. On June 30, 1997.

Response 6: OAM has changed accordingly.

On June 11, 1998, INDOT, Seymour District Employees, submitted comments on the proposed FESOP modification. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 7: The employees of the Indiana Department of Transportation, Seymour District Office, would like to comment on the proposed permit for an increase in emissions for the Cargill, Inc. located just off Highway 50 in Seymour, Indiana. Our office is located just South and adjacent to the Cargill plant. Presently there are days that emissions make it impossible for employees to go outside without one's eyes burning. If the wind is right, clouds of smoke blow from the plant right into the air ventilation system in our buildings, making it almost impossible to work inside as well. Cargill, Inc. Has had problems with their emissions (an attachment of an article from the Seymour Tribune). Until Cargill can control their emissions at present levels, IDEM should not grant this permit.

Response 7: No current violations of 326 IAC 2-8 at the Cargill plant have been determined at this time. All conditions specified in FESOP F-071-5752-00013, have been satisfied to the extent required. The Office of Air Management (OAM) routinely performs air quality analyses to insure that issuance of a permit or registration will not result in a violation of any state or federal air regulations and standards. OAM also requires the source to maintain record keeping, reporting and a compliance monitoring plan to demonstrate compliance with all rules that are specified by FESOP 071-5752-00013. A permit would be denied if the application does not meet the requirement of 326 IAC 2 or if the source would pose a threat to public health. Any problems that are observed by INDOT - Seymour District, the Compliance Section can be contacted at 317-233-5674.

Upon further review, OAM has made the following changes (changes are bolded and crossed out for emphasis):

1. Condition D.1.7, Daily Visible Emissions Notations, shall be changed accordingly (changes are bolded and crossed out for emphasis):

Daily visible emission notations of the ~~screening and classifying~~ **granulator, cooler and dryer** operations stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

2. Condition C.11, Emission Reporting, was originally required in the FESOP 071-5752. Since the source does not emit any criteria pollutant above 100 tons per year and is located in an attainment area, 326 IAC 2-6 (Emission Reporting) is not required. This condition shall be deleted from the FESOP and shall be reflected on page 18 of 25.