INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: December 3, 2012

RE: Cargill AgHorizons / 127-32495-00025

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot12/3/07

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December 3, 2012

Mr. Ryan McCoy
Cargill AgHorizons
6640 Ship Drive
Portage, Indiana 46368

Re: 127-32495-00025
Administrative Amendment to:
FESOP No.127-20184-00025

Dear Mr. McCoy:

Cargill AgHorizons was issued FESOP No. 127-20184-00025 on June 23, 2005 for a stationary grain elevator. Pursuant to the provisions of 326 IAC 2-8-11.1, the permit is hereby administratively amended to incorporate the following proposed construction as described in the attached Technical Support Document:

One (1) open grain storage pile with a capacity of 150,000 bushels and a maximum throughput rate of 4,500 tons per year, approved in 2012 for construction.

Trucks will dump the grain to the ground and front-end loaders will load-in grain into the proposed open grain storage pile. Trucks will load-out the grain from the open grain storage pile into existing receiving pit.

This open grain storage pile will temporarily address storage capacity shortfall or serves as a surge pile until grain can be shipped out to customers. This proposed storage pile will not increase the capacity of the plant and will not affect existing upstream and downstream processes.

All conditions of the permit shall remain unchanged and in effect. Please find a copy of the revised FESOP.

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 Aida De Guzman at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: Porter County
Porter County Health Department
Compliance and Enforcement Branch

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Cargill AgHorizons
6600 Highway 12 – Burns Waterway
Portage, Indiana 46368

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

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

Operation Permit No.: F 127-20184-00025	
Original Signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 23, 2005 Expiration Date: June 23, 2015

First Administrative Amendment No. 127-23376-00025, issued on August 22, 2006
Second Administrative Amendment No. 127-26440-00025, issued on May 2, 2008
Third Administrative Amendment No.: 127-29503-00025, issued on January 20, 2011

Fourth Administrative Amendment No.: 127-32495-00025	
Issued by: Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 3, 2012 Expiration Date: June 23, 2015

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary grain elevator.

Source Address:	6600 Highway 12 – Burns Waterway, Portage, IN 46368
General Source Phone:	219-787-5704
SIC Code:	5153
Source Location Status:	Porter Nonattainment for PM-2.5 Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

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

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

(a) Two (2) truck dumps, one (1) rail car dump, and one (1) rail loadout, all identified as System #1, controlled by baghouse DS61, rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 61.

(b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225), discharge (#BC-205), and conveyor intake (#BC-203), all identified as System #2, controlled by baghouse DS62 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 62.

(c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), two (2) enclosed screw conveyors, which distribute the product into two (2) 18,000-bushel bins (#BC-211 and BC-212), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three (3) surge hoppers, and weigh hopper (#S-14), all identified as System #3, controlled by baghouse DS63 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 63.

(d) The Peco loading system and ship loading, all identified as System #4, controlled by baghouse DS65 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 65.

(e) Pneumatic dust handling system, identified as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is re-circulated into the dust handling system.

(f) Two (2) natural gas fired grain dryers, DR41 and DR43, each equipped with an integral self-cleaning screen with 61 mesh size and rated at 40 million BTU per hour, installed in May 1981, exhausted through Stack DR41/43.

(g) One (1) flat grain storage building, with a maximum capacity of 2,500,000 bushels.

(h) One (1) grain bagging operation, approved for construction in 2010, with a maximum annual throughput of 2,000,000 bushels.

(i) One (1) open grain storage pile with a capacity of 150,000 bushels and at maximum throughput rate of 4,500 tons per year, approved in 2012 for construction.

Trucks will dump the grain to the ground and front-end loaders will load-in grain into the proposed open grain storage pile. Trucks will load-out the grain from the open grain storage pile into existing receiving pit.

This open grain storage pile will temporarily address storage capacity shortfall or serves as a surge pile until grain can be shipped out to customers. This proposed storage pile will not increase the capacity of the plant and will not affect existing upstream and downstream processes.

Under 40 CFR 60, Subpart DD, emission units (a) through (f) listed above are considered affected facilities. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

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

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

Eight (8) space heaters with a combined heat input of one and two tenths (1.2) million Btu per hour.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F127-20184-00025, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267**.**

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F127-20184-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

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

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period;

(2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;

(3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.6 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.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: System #1

(a) Two (2) truck dumps, one (1) rail car dump, and one (1) rail loadout, all identified as System #1, controlled by baghouse DS61, rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 61.

Under 40 CFR 60, Subpart DD, these units are considered affected facilities. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

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

D.1.1 PM and PM_{10} Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

(a) The PM emissions from System #1 exhausted through Stack DS 61 shall not exceed 3.60 pounds of PM per hour.

(b) The PM_{10} emissions from System #1 exhausted through Stack DS 61 shall not exceed 3.60 pounds of PM_{10} per hour.

Compliance with these PM and PM10 emission limitations combined with those specified in Conditions D.2.3, D.3.3, D.4.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM10.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the baghouse DS61 for particulate control shall be in operation and control emissions from System #1 at all times that any part of System #1 is in operation.

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

D.1.4 Visible Emissions Notations

(a) Daily visible emission notations of the System #1 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emission is are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with System #1, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

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

D.1.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling System #1. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with condition D.1.4, the Permittee shall maintain records of visible emission notations of the System #1 stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).

(b) To document the compliance status with condition D.1.5, the Permittee shall maintain records once per day of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a reading (i.e., the process did not operate that day).

(c) To document the compliance status with condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: System #2

(b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225), discharge (#BC-205), and conveyor intake (#BC-203), all identified as System #2, controlled by baghouse DS62 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 62.

Under 40 CFR 60, Subpart DD, these units are considered affected facilities. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

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

D.2.1 PM and PM_{10} Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

(a) The PM emissions from System #2 exhausted through Stack DS 62 shall not exceed 2.40 pounds of PM per hour.

(b) The PM10 emissions from System #2 exhausted through Stack DS 62 shall not exceed 2.40 pounds of PM10 per hour.

Compliance with these PM and PM_{10} emission limitations combined with those specified in Conditions D.1.3, D.3.3, D.4.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM_{10}.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the baghouse DS62 for particulate control shall be in operation and control emissions from System #2 at all times that any part of System #2 is in operation.

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM-10 testing for System #2 utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the System #2 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with System #2, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling System #2. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Bag failure can be indicated by a significant drop in

the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the System #2 stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain records once per day of the total static pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a reading (i.e., the process did not operate that day).

(c) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under condition D.2.7.

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: System #3

(c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), two (2) enclosed screw conveyors, which distribute the product into two (2) 18,000-bushel bins (#BC-211 and BC-212), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three (3) surge hoppers, and weigh hopper (#S-14), all identified as System #3, controlled by baghouse DS63 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 63.

Under 40 CFR 60, Subpart DD, these units are considered affected facilities. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

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

D.3.1 PM and PM_{10} Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

(a) The PM emissions from System #3 exhausted through Stack DS 63 shall not exceed 1.79 pounds of PM per hour.

(b) The PM_{10} emissions from System #3 exhausted through Stack DS 63 shall not exceed 1.79 pounds of PM_{10} per hour.

Compliance with these PM and PM_{10} emission limitations combined with those specified in Conditions D.1.3, D.2.3, D.4.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM_{10}.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.3.3 Particulate Control

In order to comply with condition D.3.1, the baghouse DS63 for particulate control shall be in operation and control emissions from System #3 at all times that any part of System #3 is in operation.

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with condition D.3.1, the Permittee shall perform PM and PM-10 testing for System #3 utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the System #3 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #3, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, 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 System #3. Inspections required by this condition shall not be performed in consecutive months. 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 Section C - Response to Excursions or Exceedances shall be initiated. For any failure with corresponding response steps and timetable not described in Section C - Response to Excursions or Exceedances, 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 - Response to Excursions or Exceedances, shall be considered a deviation from 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 2-8-4(3)] [326 IAC 2-8-16]

D.3.9 Record Keeping Requirements

(a) To document the compliance status with condition D.3.5, the Permittee shall maintain records of visible emission notations of the System #3 stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).

(b) To document the compliance status with condition D.3.6, the Permittee shall maintain records once per day of the total static pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a reading (i.e., the process did not operate that day).

(c) To document the compliance status with condition D.3.7, the Permittee shall maintain records of the results of the inspections required under condition D.3.9.

(d) Section C - General Record Keeping Requirements~~,~~ of this permit contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: System #4

(d) The Peco loading system and ship loading, all identified as System #4, controlled by baghouse DS65 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 65.

Under 40 CFR 60, Subpart DD, these units are considered affected facilities. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

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

D.4.1 PM and PM_{10} Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

(a) The PM emissions from System #4 exhausted through Stack DS 65 shall not exceed 1.62 pounds of PM per hour.

(b) The PM_{10} emissions from System #4 exhausted through Stack DS 65 shall not exceed 1.62 pounds of PM_{10} per hour.

Compliance with these PM and PM_{10} emission limitations combined with those specified in Conditions D.1.3, D.2.3, D.3.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM_{10}.

D.4.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.4.3 Particulate Control

In order to comply with conditions D.4.1, the baghouse DS65 for particulate control shall be in operation and control emissions from System #4 at all times that any part of System #4 is in operation.

D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with condition D.4.1, the Permittee shall perform PM and PM-10 testing for System #4 utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.4.5 Visible Emissions Notations

(a) Daily visible emission notations of the System #4 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.4.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #4, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from 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 shall be calibrated or replaced at least once every six (6) months.

D.4.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling System #4. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.4.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.4.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.4.5, the Permittee shall maintain records of visible emission notations of the System #4 stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).

(b) To document the compliance status with Condition D.4.6, the Permittee shall maintain records once per day of the total static pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a reading (i.e., the process did not operate that day).

(c) To document the compliance status with Condition D.4.7, the Permittee shall maintain records of the results of the inspections required under condition D.4.7.

(d) Section C - General Record Keeping Requirements~~,~~ of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: System #5

(e) Pneumatic dust handling system, identified as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is re-circulated into the dust handling system.

Under 40 CFR 60, Subpart DD, this unit is considered an affected facility. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

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

D.5.1 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Grain Dryers DR41 and DR43

(f) Two (2) natural gas fired grain dryers, DR41 and DR43, each equipped with an integral self-cleaning screen with 61 mesh size and rated at 40 million BTU per hour, installed in May 1981, exhausted through Stack DR41/43.

Under 40 CFR 60, Subpart DD, these units are considered affected facilities. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

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

D.6.1 PM and PM_{10} Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003, and revised by this permit 127-20184-00025:

(a) The two (2) natural gas fired grain dryers, DR41 and DR43, shall be limited to a combined 5,000,000 bushels of grain dried per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this throughput limitation combined with those specified in Conditions D.1.3, D.2.3, D.3.3, and D.4.3 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM_{10}.

D.6.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable combined particulate emission rate from the two (2) natural gas fired grain dryers shall not exceed 53.1 pounds per hour when operating at a process weight rate of 120 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

D.6.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.6.4 Particulate Control

In order to comply with condition D.6.2, each self cleaning screen for PM control shall be in operation and control emission form the corresponding grain dryer at all times when the corresponding grain dryer is in operation.

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

D.6.5 Visible Emissions Notations

(a) Visible emission notations of the grain dryer stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.6.6 Self Cleaning Screens Inspections

An inspection shall be performed of the self cleaning screens as outlined in the preventive maintenance plan, but not less than once every six (6) months. Inspections required by this condition shall not be performed in consecutive months. All defective parts shall be repaired or replaced as necessary.

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

D.6.7 Record Keeping Requirements

(a) To document the compliance status with condition D.6.1(a), the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the throughput limits established in condition D.6.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) total bushels of grain dried per calendar month from two (2) natural gas fired grain dryers, DR41 and DR43, and

(b) To document the compliance status with condition D.6.5, the Permittee shall maintain records of visible emission notations of the two (2) natural gas fired grain dryers, DR41 and DR43, stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).

(c) To document the compliance status with condition D.6.6, the Permittee shall maintain records of the results of the inspections required under condition D.6.6.

(d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.6.8 Reporting Requirements

A quarterly summary of the information to document compliance with condition D.6.1(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Open Grain Storage Pile

(g) One (1) flat grain storage building, with a maximum capacity of 2,500,000 bushels.

(i) One (1) open grain storage pile with a capacity of 150,000 bushels and at maximum throughput rate of 4,500 tons per year, approved in 2012 for construction.

Trucks will dump the grain to the ground and front-end loaders will load-in grain into the proposed open grain storage pile. Trucks will load-out the grain from the open grain storage pile into existing receiving pit.

This open grain storage pile will temporarily address storage capacity shortfall or serves as a surge pile until grain can be shipped out to customers. This proposed storage pile will not increase the capacity of the plant and will not affect existing upstream and downstream processes.

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

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

D.7.1 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to Section C - Fugitive Particulate Matter Emission Limitations.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Grain Bagging Operation

(h) One (1) grain bagging operation, approved for construction in 2010, with a maximum annual throughput of 2,000,000 bushels.

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

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

D.8.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the grain bagging operation shall not exceed 51.28 pounds per hour when operating at a process weight rate of 100 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description:

(a) Two (2) truck dumps, one (1) rail car dump, and one (1) rail loadout, all identified as System #1, controlled by baghouse DS61, rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 61.

(b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225), discharge (#BC-205), and conveyor intake (#BC-203), all identified as System #2, controlled by baghouse DS62 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 62.

(c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), two (2) enclosed screw conveyors, which distribute the product into two (2) 18,000-bushel bins (#BC-211 and BC-212), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three (3) surge hoppers, and weigh hopper (#S-14), all identified as System #3, controlled by baghouse DS63 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 63.

(d) The Peco loading system and ship loading, all identified as System #4, controlled by baghouse DS65 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 65.

(e) Pneumatic dust handling system, identified as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is re-circulated into the dust handling system.

(f) Two (2) natural gas fired grain dryers, DR41 and DR43, each equipped with an integral self-cleaning screen with 61 mesh size and rated at 40 million BTU per hour, installed in May 1981, exhausted through Stack DR41/43.

Under 40 CFR 60, Subpart DD, emission units (a) through (f) listed above are considered affected facilities. [40 CFR 60, Subpart DD][326 IAC 12-1]

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

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1-1] [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60, Subpart DD, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, as specified in Table 8 of 40 CFR Part 60, Subpart DD in accordance with schedule in 40 CFR 60 Subpart DD.

E.1.2 Standards of Performance for Grain Elevators [40 CFR Part 60, Subpart DD] [326 IAC 12]

The Permittee, which operates a stationary grain elevator, shall comply with the following provisions of 40 CFR Part 60, Subpart DD (included as Attachment B of this permit):

(a) 40 CFR 60.300
(b) 40 CFR 60.301
(c) 40 CFR 60.302
(d) 40 CFR 60.303
(e) 40 CFR 60.304

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Cargill AgHorizons
Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
FESOP No.: F127-20184-00025

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Cargill AgHorizons
Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
FESOP No.: F127-20184-00025

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

FESOP QUARTERLY REPORT

Source Name: Cargill AgHorizons
Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
FESOP No.: F127-20184-00025
Facility: Two (2) natural gas fired grain dryers, DR41 and DR43
Parameter: combined bushels of grain dried per month
Limit: 5,000,000 bushels of grain dried per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

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

Source Name: Cargill AgHorizons
Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
FESOP No.: F127-20184-00025

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

ATTACHMENT B

40 CFR 60, Subpart DD—Standards of Performance for Grain Elevators

Source: 43 FR 34347, Aug. 3, 1978, unless otherwise noted.

§ 60.300 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under § 60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.
(b) Any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after August 3, 1978, is subject to the requirements of this part.
[43 FR 34347, Aug. 3, 1978, as amended at 52 FR 42434, Nov. 5, 1988]

§ 60.301 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.
(a) *Grain* means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.
(b) *Grain elevator* means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.
(c) *Grain terminal elevator* means any grain elevator which has a permanent storage capacity of more than 88,100 m^3 (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.
(d) *Permanent storage capacity* means grain storage capacity which is inside a building, bin, or silo.
(e) *Railcar* means railroad hopper car or boxcar.
(f) *Grain storage elevator* means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m^3 (ca. 1 million bushels).
(g) *Process emission* means the particulate matter which is collected by a capture system.
(h) *Fugitive emission* means the particulate matter which is not collected by a capture system and is released directly into the atmosphere from an affected facility at a grain elevator.
(i) *Capture system* means the equipment such as sheds, hoods, ducts, fans, dampers, etc. used to collect particulate matter generated by an affected facility at a grain elevator.
(j) *Grain unloading station* means that portion of a grain elevator where the grain is transferred from a truck, railcar, barge, or ship to a receiving hopper.
(k) *Grain loading station* means that portion of a grain elevator where the grain is transferred from the elevator to a truck, railcar, barge, or ship.
(l) *Grain handling operations* include bucket elevators or legs (excluding legs used to unload barges or ships), scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse and other such structures.
(m) *Column dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in one or more continuous packed columns between two perforated metal sheets.
(n) *Rack dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in a cascading flow around rows of baffles (racks).
(o) *Unloading leg* means a device which includes a bucket-type elevator which is used to remove grain from a barge or ship.
[43 FR 34347, Aug. 3, 1978, as amended at 65 FR 61759, Oct. 17, 2000]

§ 60.302 Standard for particulate matter.

(a) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, 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).
(2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.
(b) On and after the date on which the performance test required to be conducted by § 60.8 is completed, 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).
(2) Exhibits greater than 0 percent opacity.
(c) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, 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.
(d) The owner or operator of any barge or ship unloading station shall operate as follows:
(1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
(2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft^3 /bu).
(3) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

§ 60.303 Test methods and procedures.

(a) In conducting the performance tests required in § 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in § 60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.
(b) The owner or operator shall determine compliance with the particulate matter standards in § 60.302 as follows:
(1) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.
(2) Method 2 shall be used to determine the ventilation volumetric flow rate.
(3) Method 9 and the procedures in § 60.11 shall be used to determine opacity.
(c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:
(1) For Method 5, Method 17 may be used.
[54 FR 6674, Feb. 14, 1989]

§ 60.304 Modifications.

(a) The factor 6.5 shall be used in place of “annual asset guidelines repair allowance percentage,” to determine whether a capital expenditure as defined by § 60.2 has been made to an existing facility.
(b) The following physical changes or changes in the method of operation shall not by themselves be considered a modification of any existing facility:
(1) The addition of gravity loadout spouts to existing grain storage or grain transfer bins.
(2) The installation of automatic grain weighing scales.
(3) Replacement of motor and drive units driving existing grain handling equipment.
(4) The installation of permanent storage capacity with no increase in hourly grain handling capacity.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	**Cargill AgHorizon**
Source Location:	**6600 Highway 12 – Burns Waterway, Portage, IN 46368**
County:	**Porter**
SIC Code:	**5153**
Operation Permit No.:	**F 127-20184-00025**
Operation Permit Issuance Date:	**June 23, 2005**
Administrative Amendment No.:	**127-32495-00025**
Permit Reviewer:	**Aida DeGuzman**

On November 5, 2012, the Office of Air Quality (OAQ) received an application from Cargill AgHorizon related to a modification to the existing plant.

Existing Approvals

The source was issued FESOP No. 127-20184-00025 on June 23, 2005. The source has since received the following approvals:

(a) First Administrative Amendment No. 127-23376-00025, issued on August 22, 2006

(b) Second Administrative Amendment No. 127-26440-00025, issued on May 2, 2008

(c) Third Administrative Amendment No.: 127-29503-00025, issued on January 20, 2011

County Attainment Status

The source is located in Porter County.

Pollutant	Designation
SO_2	Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Attainment effective May 11, 2010, for the 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective February 6, 2012, for the annual $PM_{2.5}$ standard
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1] Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area, including Porter County, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Porter County as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) $PM_{2.5}$
Porter County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Porter County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

The PTE information in the following table was taken from the most recent approved Administrative Amendment No. 127-29503-00025, issued on January 20, 2011.

	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
Process/ Emission Unit	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
DS61, System #1	15.77	15.77	15.77	0.00	0.00	0.00	0.00	-	0.00	0.00
DS62, System #2	10.51	10.51	10.51	0.00	0.00	0.00	0.00	-	0.00	0.00
DS63, System #3	7.84	7.84	7.84	0.00	0.00	0.00	0.00	-	0.00	0.00
DS64, System #4	7.10	7.10	7.10	0.00	0.00	0.00	0.00	-	0.00	0.00

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
DS65, System #5	negl.	negl.	negl.	0.00	0.00	0.00	0.00	-	0.00	0.00
DR41 & DR43 ***Grain Dryers each @ 40 MMBtu/hr	36.4	38.4	38.4	0.2	34.40	1.90	28.9	41,474	0.65	0.62 (Hexane)
Space Heaters (total 1.2 MMBtu/hr)	0.01	0.04	0.04	negl.	0.53	0.03	0.44	622	0.0097	0.00927 (Hexane)
Storage Flat Building	0.88	0.22	0.22	0.00	0.00	0.00	0.00	-	0.00	0.00
Grain Bag Storage Operation	4.41	1.89	0.32	0.00	0.00	0.00	0.00	-	0.00	0.00
Total PTE of Entire Source	**82.92**	**81.77**	**80.2**	**0.2**	**34.93**	**1.93**	**29.34**	**42,096**	**0.66**	**0.63 (Hexane)**
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible
**The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

*** - The natural gas combustion emissions from the existing dryers and space heaters were added since they were not accounted for in the PTE table under "**Status of the Existing Source**" in the most recent approved Administrative Amendment No. 127-29503-00025.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major stationary source, under Part 70 Operating Permit Program (326 IAC 2-7), because no pollutant is emitted at a rate of 100 tons per year or more.

(d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Cargill AgHorizon on November 5, 2012, relating to the proposed construction of the following:

(a) One (1) open grain storage pile with a capacity of 150,000 bushels and at maximum throughput rate of 4,500 tons per year, approved in 2012 for construction.

Trucks will dump the grain to the ground and front-end loaders will load-in grain into the proposed open grain storage pile. Trucks will load-out the grain from the open grain storage pile into existing receiving pit.

This open grain storage pile will temporarily address storage capacity shortfall or serves as a surge pile due to the unavailability of rail and barge to move the grain out to customers due to Hurricane Sandy. This proposed storage pile will not increase the capacity of the plant and will not affect existing upstream and downstream processes.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Change

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Trucks Grain Unloading (dumped on the ground)	0.41	0.13	0.02	-	-	-	-	-	-	-
Front -End Loaders (load-in grain to open pile)	0.41	0.13	0.02	-	-	-	-	-	-	-
Wind Erosion - Open Grain Storage Pile (fugitive)	0.04	0.02	0.00	-	-	-	-	-	-	-
Truck Loadout (from open pile to existing pit)	0.41	0.13	0.02	-	-	-	-	-	-	-
Total PTE of Change	1.26	0.42	0.17	-	-	-	-	**-**	**-**	**-**
negl. = negligible										

The proposed Open Grain Storage Pile will result in a PTE of less than 5 tons per year of PM, PM10 and direct PM2.5 which is considered exempt under 2-8-11.1. Therefore, this storage piles will be incorporated into the FESOP through an Administrative Amendment.

PTE of the Entire Source After Issuance of the FESOP Administrative Amendment

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Change (tons/year)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
DS61, System #1	15.77	15.77	15.77	0.00	0.00	0.00	0.00	-	0.00	0.00
DS62, System #2	10.51	10.51	10.51	0.00	0.00	0.00	0.00	-	0.00	0.00
DS63, System #3	7.84	7.84	7.84	0.00	0.00	0.00	0.00	-	0.00	0.00
DS64, System #4	7.10	7.10	7.10	0.00	0.00	0.00	0.00	-	0.00	0.00
DS65, System #5	negl.	negl.	negl.	0.00	0.00	0.00	0.00	-	0.00	0.00
DR41 & DR43 ***Grain Dryers each @ 40 MMBtu/hr	36.4	38.4	38.4	0.2	34.40	1.90	28.9	41,474	0.66	0.63 (Hexane)
Space Heaters (total 1.2 MMBtu/hr)	0.01	0.04	0.04	negl.	0.53	0.03	0.44	622	0.0097	0.00927 (Hexane)
Storage Flat Building	0.88	0.22	0.22	0.00	0.00	0.00	0.00	-	0.00	0.00
Grain Bag Storage Operation	4.41	1.89	0.32	0.00	0.00	0.00	0.00	-	0.00	0.00
Proposed Open Grain Storage Pile	**1.26**	**0.42**	**0.07**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Total PTE of Entire Source	**84.18**	**82.19**	**80.27**	**0.2**	**34.93**	**1.93**	**29.34**	**42,096**	**0.67**	**0.64 (Hexane)**
Title V Major Source Thresholds**	NA	100	N/A	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible
**The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

(a) FESOP Status
The proposed change to an existing Title V minor stationary source will not change its minor status, because the potential to emit criteria pollutants from the entire source will remain at less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(b) PSD Status
The proposed change to an existing PSD minor stationary source will not change its minor status, because the potential to emit criteria pollutants from the entire source will remain at less than the PSD major source threshold levels.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) 40 CFR Part 60, Subpart DD - Standards of Performance for Grain Elevators
This subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under § 60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations

The source is subject to this NSPS because it is a grain terminal elevator with a permanent storage capacity of more than 2.5 million bushels.

The proposed open grain storage pile is not among the emission units at a grain terminal elevator subject to 40 CFR Part 60, Subpart DD. In addition, it does not meet the definition of grain handling operations because it does not include bucket elevators or legs (excluding legs used to unload barges or ships), scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers and the headhouse and other such structures.

(b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

There are no NESHAPs applicable to the source or the proposed open grain storage pile.

Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is located in Porter County, it has actual emissions of NOx and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(d) 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:

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) 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.

(e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Due to this revision, the source is subject to the requirements of 326 IAC 6-4, because the proposed open grain storage pile has the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

(f) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The operations (Trucks Grain Unloading, Front -End Loaders (load-in grain to open pile and Truck Loadout (from open pile to existing pit), associated with the proposed open grain storage pile are not subject to 326 IAC 6-3, because 326 IAC 6-3-1(b)(14) specifically exempts manufacturing processes with potential particulate emissions less than 0.551 pound per hour.

Proposed Changes

The changes listed below have been made to FESOP No. 127-20184-00025, issued on June 23, 2005. Deleted language appears as strikethroughs and new language appears in **bold**:

Changes to SECTION A.2

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
This stationary source consists of the following emission units and pollution control devices:

* * *

(i) One (1) open grain storage pile with a capacity of 150,000 bushels and at maximum throughput rate of 4,500 tons per year, approved in 2012 for construction.

Trucks will dump the grain to the ground and front-end loaders will load-in grain into the proposed open grain storage pile. Trucks will load-out the grain from the open grain storage pile into existing receiving pit.

This open grain storage pile will temporarily address storage capacity shortfall or serves as a surge pile until grain can be shipped out to customers. This proposed storage pile will not increase the capacity of the plant and will not affect existing upstream and downstream processes.

Changes to SECTION D.7:

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Open Grain Storage Pile

(g) One (1) flat grain storage building, with a maximum capacity of 2,500,000 bushels.

(i) One (1) open grain storage pile with a capacity of 150,000 bushels and at maximum throughput rate of 4,500 tons per year, approved in 2012 for construction.

Trucks will dump the grain to the ground and front-end loaders will load-in grain into the proposed open grain storage pile. Trucks will load-out the grain from the open grain storage pile into existing receiving pit.

This open grain storage pile will temporarily address storage capacity shortfall or serves as a surge pile until grain can be shipped out to customers. This proposed storage pile will not increase the capacity of the plant and will not affect existing upstream and downstream processes.

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

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

D.7.1 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to Section C - Fugitive Particulate Matter Emission Limitations.

IDEM, OAQ has clarified the following conditions:

D.1.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with System #1, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range ~~of 1.0 and 5.0 inches of water or a range established during the latest stack test~~, the Permittee shall take reasonable response steps. **The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.** Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

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

D.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with System #2, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range ~~of 1.0 and 5.0 inches of water or a range established during the latest stack tes~~t, the Permittee shall take reasonable response steps. **The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of**

water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #3, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range ~~of 1.0 and 5.0 inches of water or a range established during the latest stack test~~, the Permittee shall take reasonable response steps. **The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test**. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

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

D.4.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #4, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range ~~of 1.0 and 5.0 inches of water or a range established during the latest stack test,~~ the Permittee shall take reasonable response steps. **The normal range for this unit is a pressure drop between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test**. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from 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 shall be calibrated or replaced at least once every six (6) months.

Conclusion and Recommendation

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 November 5, 2012

The construction and operation of this proposed unit shall be subject to the conditions of the attached FESOP Administrative Amendment No. 127-32495-00025. The staff recommends to the Commissioner that this FESOP Administrative Amendment be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Aida DeGuzman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4972*)* or toll free at 1-800-451-6027 extension (3-4972*)*.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

Company Name: **Cargill AgHorizons**
Address City IN Zip: **6600 US 12-Burns Waterway, Portage, IN 46368**
AA Number: **AA127-32495**
Plt ID: **127-00025**
Reviewer: **Aida DeGuzman**
Date: **11/5/2012**

	Process	Uncontrolled Potential Emissions (tons per year)								
		PM	PM10	PM2.5	VOC	CO	NOx	SO2	Total HAPs	Highest Individual HAP
Existing Units	DS61, System #1	509.00	509.00	509.00	0.00	0.00	0.00	0.00	0.00	0.00
	DS62, System #2				0.00	0.00	0.00	0.00	0.00	0.00
	DS63, System #3				0.00	0.00	0.00	0.00	0.00	0.00
	DS64, System #4				0.00	0.00	0.00	0.00	0.00	0.00
	DS65, System #5				0.00	0.00	0.00	0.00	0.00	0.00
	DR41 & DR43 Grain Dryers				1.93	29.40	35.00	0.21	0.66	0.63 (hexane)
	Space Heaters				0.03	0.44	0.53	negl.	0.01	0.01 (hexane)
	Storage Flat Building				0.00	0.00	0.00	0.00	0.00	0.00
	Grain Bag Storage Operation	4.41	1.89	0.32	0.00	0.00	0.00	0.00	0.00	0.00
New Unit	Open Grain Pile	1.26	0.42	0.07	0.00	0.00	0.00	0.00	0.00	0.00
	Total	514.67	511.31	509.39	1.96	29.84	35.53	0.21	0.67	0.64 (hexane)

	Process	Limited Potential Emissions (tons per year)								
		PM	PM10	PM2.5	VOC	CO	NOx	SO2	Total HAPs	Highest Individual HAP
Existing Units	DS61, System #1	15.77	15.77	15.77	0.00	0.00	0.00	0.00	0.00	0.00
	DS62, System #2	10.51	10.51	10.51	0.00	0.00	0.00	0.00	0.00	0.00
	DS63, System #3	7.84	7.84	7.84	0.00	0.00	0.00	0.00	0.00	0.00
	DS64, System #4	7.10	7.10	7.10	0.00	0.00	0.00	0.00	0.00	0.00
	DS65, System #5	negl.	negl.	negl.	0.00	0.00	0.00	0.00	0.00	0.00
	DR41 & DR43 Grain Dryers	36.40	38.40	38.40	1.9	28.90	34.40	0.21	0.66	0.63 (hexane)
	Space Heaters	0.01	0.04	0.04	0.03	0.44	0.53	negl.	0.01	0.01 (hexane)
	Storage Flat Building	0.88	0.22	0.22	0.00	0.00	0.00	0.00	0.00	0.00
	Grain Bag Storage Operation	4.41	1.89	0.32	0.00	0.00	0.00	0.00	0.00	0.00
New Unit	Open Grain Pile	1.26	0.42	0.07	0.00	0.00	0.00	0.00	0.00	0.00
	Total	84.18	82.19	80.27	1.93	29.34	34.93	0.21	0.67	0.64 (hexane)

Notes

1) Emissions for existing units were obtained from Appendix A to FESOP 127-29503-00025 (dated January 20, 2011).

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Address City IN Zip: **6600 US 12-Burns Waterway, Portage, IN 46368**
AA Number: **AA127-32495**
Plt ID: **127-00025**
Reviewer: **Aida DeGuzman**
Date: **11/5/2012**

The Cargill AgHorizons facility located in Portage, IN is planning to construct a temporary open grain storage pile (pile) to address a storage capacity shortfall arising from the lack of rail and barge grain transportation availability resulting from Hurricane Sandy. It is anticipated that the temporary pile will be used to store up to 150,000 bushels of grain. The pile will be constructed using a front end loader after the grain is dumped on the ground by delivery trucks. The pile will not be covered. The grain will be removed from the pile using a front-end loader and trucks for transport to a receiving pit located in the Portage facility. It is anticipated that the pile will be temporary in nature and present onsite for less than 60 days while the transportation issues are resolved.

Assumptions

Pile Capacity	150,000 bushels
Grain density	60 pounds/bushel
System capacity	4,500 tons/yr

Emission Point Description	Processing Rate ton/year	Emission Factor	Emission Factor Units	Emission Factor Source	Emission Control System Type	Capture Efficiency %	Control Efficiency %	Emissions ton/year
PM (potential)								
Dump to Ground from Trucks	4,500	0.18	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.41
Transfer to Pile using Front-end Loader	4,500	0.18	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.41
Wind Erosion of Temporary Ground Pile	4,500	see calculated		AP-42, Table 13.2.5-2	None	0	NA	0.04
Truck Load out of Temporary Ground Pile	4,500	0.18	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.41
								1.26
PM10 (potential)								
Dump to Ground from Trucks	4,500	0.059	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.13
Transfer to Pile using Front-end Loader	4,500	0.059	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.13
Wind Erosion of Temporary Ground Pile	4,500	see calculated		AP-42, Table 13.2.5-2	None	0	NA	0.02
Truck Load out of Temporary Ground Pile	4,500	0.059	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.13
								0.42
PM2.5 (potential)								
Dump to Ground from Trucks	4,500	0.010	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.02
Transfer to Pile using Front-end Loader	4,500	0.010	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.02
Wind Erosion of Temporary Ground Pile	4,500	see calculated		AP-42, Table 13.2.5-2	None	0	NA	0.00
Truck Load out of Temporary Ground Pile	4,500	0.010	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.02
								0.07

Emission Point Description	Processing Rate ton/year	Emission Factor	Emission Factor Units	Emission Factor Source	Emission Control System Type	Capture Efficiency %	Control Efficiency %	Emissions ton/year
PM (limited)								
Dump to Ground from Trucks	4,500	0.18	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.41
Transfer to Pile using Front-end Loader	4,500	0.18	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.41
Wind Erosion of Temporary Ground Pile	4,500	see calculated		AP-42, Table 13.2.5-2	None	0	NA	0.04
Truck Load out of Temporary Ground Pile	4,500	0.18	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.41
								1.26
PM10 (limited)								
Dump to Ground from Trucks	4,500	0.059	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.13
Transfer to Pile using Front-end Loader	4,500	0.059	lb/ton	AP-42	None	0	0	0.13
Wind Erosion of Temporary Ground Pile	4,500	see calculated		AP-42, Table 13.2.5-2	None	0	NA	0.02
Truck Load out of Temporary Ground Pile	4,500	0.059	lb/ton	AP-42	None	0	0	0.13
								0.42
PM2.5 (limited)								
Dump to Ground from Trucks	4,500	0.010	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.02
Transfer to Pile using Front-end Loader	4,500	0.010	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.02
Wind Erosion of Temporary Ground Pile	4,500	see calculated		AP-42, Table 13.2.5-2	None	0	NA	0.00
Truck Load out of Temporary Ground Pile	4,500	0.010	lb/ton	AP-42, Table 9.9.1-1	None	0	0	0.02
								0.07

Notes

1) Assumed that all deliveries are via end dump trucks.

2) See the follow sheets for wind erosion emissions calculations

3) Potential emissions assume that the pile was present onsite for 365 days per year

4) Limited emissions assume that the pile was present onsite for 60 days per year.

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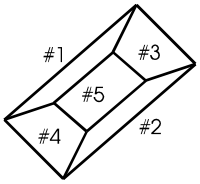
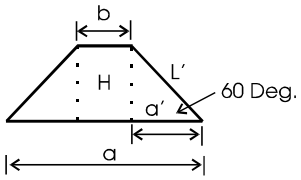
Emissions resulting from wind erosion of the open grain storage pile were calculated using the approach presented in AP-42, 13.2.5 Industrial Wind Erosion (11/06). In general, the undisturbed surface of an open grain pile is characterized as having a finite amount of erodible material referred to as the erosion potential.

The open grain pile is pyramid shaped. It is assumed to be similar to Pile B1 presented in Figure 13.2.5-2 for purposes of calculating the erosion potential.

Ground Pile Length =	**150**	**Feet**
Ground Pile Width =	**50**	**Feet**
Ground Pile Height =	**25**	**Feet**





The surface area of the pyramid is divided into four trapezoids and one rectangle.

PILE #1: Sides #1 and #2

a = 150
H = 25
L' = H/sin 60 L' = 28.9
a' = cos 60 x L' a' = 14.4
b = 121.1

Surface Area (one trapezoid) = 1/2 (a+b) x H

SA = 3,389 ft2
SA = 6,778 ft2 (sides 1 and 2)

PILE #1: Sides #3 and #4

a = 50
H = 25
L' = H/sin 30 L' = 28.9
a' = cos 30 x L' a' = 14.4
b = 21.1

Surface Area (one trapezoid) = 1/2 (a+b) x H

SA = 889 ft2
SA = 1,778 ft2 (sides 1 and 2)

PILE #1: Side #5

a = 121.1
b = 21.1

SA = a x b

SA = 2,560 ft2

TOTAL SURFACE AREA

SA = 0.26 acres 1,032.73 m^2

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Emissions Calculations - Following the example methodology provided in 13.2.5.4

1) In the absence of field data for estimating the threshold friction velocity of an open grain pile, the value for an uncrusted coal pile was selected from the values presented in 13.2.5-2 as most representative.

Threshold Friction Velocity (U_t) = 1.12 m/s

2) The surface of the open grain pile will be disturbed twice. Once as it is constructed and once as it is reclaimed

N = 2

3) Fastest mile. The fastest mile (U_{10}) was obtained from the maximum 2-minute wind speed (MPH) provided in the 2011 Local Climatologic Data Annual Summary with Comparative Data for Chicago, IL obtained from NOAA. *http://www1.ncdc.noaa.gov/pub/orders/IPS-FB68D8C9-505A-4016-9387-B2B60482CACF.pdf*

U_{10} = 55 mph
24.6 m/s

4) Calculation of Frictional Velocities

U_{10}		$U^* = 0.1 * U_{10} * U_s/U_r$		
mph	**m/s**	**U_s/U_r: 0.2**	**U_s/U_r: 0.6**	**U_s/U_r: 0.9**
55	24.6	0.49	1.48	2.21

As indicated above the threshold frictional velocity (1.12 m/s) is exceeded for areas of the pile that fall within the U_s/U_r = 0.6 and 0.9 regime of the pile surface. These areas are depicted in Figure 13.2.5-2, Pile B1.

5) Calculate the erosion potential for each affected sub area of the open grain pile

a) P (erosion potential) = $58(U^* - U_t)^2 + 25(U^* - U_t)$

U*	U* - Ut	P
(m/s)	**(m/s)**	**(g/m2)**
0.6	0.36	16.20
0.9	1.09	96.59

6) Calculate the emissions from the open grain pile on an annual basis.

a) Percent of pile surface obtained from Figure 13.2.5-2, Pile B1
b) Area of pile surface = % Pile surface * total surface area (m)
c) Emissions (g/yr) = P * area of pile surface (m2) * N

U*	P	% of Pile Surface	Area of Pile Surface	Disturbance per year	Emissions
(m/s)	**(g/m2)**		**(m2)**	**N**	**g/yr**
0.6	16.20	50%	516.36	2	16,730.02
0.9	96.59	14%	144.58	2	27,930.83
					44,660.84

7) Speciate the emissions and convert to ton/yr

a) Emissions (ton/yr) = Emissions (g/yr) * k * 0.0000009842035 g/ton

Pollutant	Aerodynamic Size Multiplier	Emissions
	k	**(tons/yr)**
PM	1.0	0.044
PM10	0.5	0.022
PM2.5	0.075	0.003

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
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TO: Ryan McCoy
Cargill AgHorizons
6640 Ship Drive
Portage, IN 46368

DATE: December 3, 2012

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Administrative Amendment
127-32495-00025

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Aaron Clotts (AECOM)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Mail Code 61-53

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3		Porter County Health Department 155 Indiana Ave, Suite 104 Valparaiso IN 46383-5502 *(Health Department)*									
4		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 *(Affected Party)*									
5		Mr. Ed Dybel 2440 Schrage Avenue Whiting IN 46394 *(Affected Party)*									
6		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 *(Affected Party)*									
7		Mr. Dee Morse National Park Service 12795 W Alameda Pky, P.O. Box 25287 Denver CO 80225-0287 *(Affected Party)*									
8		Mr. Joseph Virgil 128 Kinsale Avenue Valparaiso IN 46385 *(Affected Party)*									
9		Mark Coleman 107 Diana Road Portage IN 46368 *(Affected Party)*									
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 *(Affected Party)*									
11		Burns Harbor Town Council 1240 N. Boo Rd Burns Harbor IN 46304 *(Local Official)*									
12		Eric & Sharon Haussman 57 Shore Drive Ogden Dunes IN 46368 *(Affected Party)*									
13		Portage City Council and Mayors Office 6070 Central Ave Portage IN 46368 (Local Official)									
14		Mr. Aaron Clotts AECOM First Natl Bank Bldg 332 Minnesota St # E1000 St Paul MN 55101 *(Consultant)*									
15		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 *(Affected Party)*									

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14			

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1		Matt Mikus Post Tribune 1433 E 83rd Avenue Merrillville IN 46410 (Affected Party)									
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

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