NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a Minor Source Operating Permit (MSOP) for Gavilon Fertilizer, LLC in Allen County

MSOP Renewal No.: M 003-41871-00404

The Indiana Department of Environmental Management (IDEM) has received an application from Gavilon Fertilizer, LLC located at 3300 Bennett Street, Yoder, Indiana 46798 for a renewal of its MSOP issued on March 4, 2015. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Gavilon Fertilizer, LLC to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM’s preliminary findings are available at:

Allen County Public Library, Shawnee Branch
5600 Noll Avenue
Fort Wayne, IN 46806

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

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so
that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M 003-41871-00404 in all correspondence.

Comments should be sent to:

Kelcy Tolliver  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Kelcy Tolliver or (317) 234-6679  
Or dial directly: (317) 234-6679  
Fax: (317) 232-6749 attn: Kelcy Tolliver  
E-mail: KTollive@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Kelcy Tolliver of my staff at the above address.

[Signature]

Jesiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality
Gavilon Fertilizer, LLC  
3300 Bennett Street  
Yoder, Indiana 46798

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

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

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 MSOP under 326 IAC 2-6.1.

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<tr>
<td>Master Agency Interest ID: 15707</td>
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<td>Issued by:</td>
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<td>Josiah K. Balogun, Section Chief</td>
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<td>Permits Branch</td>
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<td>Office of Air Quality</td>
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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information

The Permittee owns and operates a stationary bulk fertilizer manufacturing, storage, and distribution plant.

Source Address: 3300 Bennett Street, Yoder, Indiana 46798
General Source Phone Number: (402) 889-4021
SIC Code: 5191 (Farm Supplies) 2874 (Phosphatic Fertilizers)
County Location: Allen
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program
Minor Source, under PSD Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) T-Reactor operation, identified as T-REACTOR (EU-1), installed in 1978, with a maximum capacity of 33 tons per hour, using no control, and exhausting to stack, S-1.

(b) One (1) dry fertilizer operation, identified as DRY FERTILIZER PROCESS (EU3 through EU9), constructed prior to 1960, with a maximum capacity of 40 tons per hour, using no control, exhausting outdoors, and consisting of the following:

   (1) One (1) underground rail unload pit, identified as Rail Unload Pit (EU3), installed in 2004;
   (2) One (1) enclosed conveyor Drop to Speed King Conveyor, identified as (EU4)
   (3) One (1) enclosed conveyor, Drop to Leveling Conveyor, identified as (EU5);
   (4) Three (3) enclosed spouts, identified as (EU6, EU7, EU8);
   (5) One (1) truck load out conveyor, identified as (EU9).

(c) Fugitive emissions from unpaved roads, identified as (EU-2).

(d) Miscellaneous liquid storage tanks, as follows:

   (1) One (1) liquid storage tank, identified as Tank # 2, storing miscellaneous fertilizer, constructed in 2002, with a maximum capacity of 16,900 gallons, using no control, and exhausting outdoors;
(2) One (1) liquid storage tank, identified as Tank #3, storing miscellaneous fertilizer, constructed in 2002, with a maximum capacity of 16,900 gallons, using no control, and exhausting outdoors;

(3) One (1) liquid storage tank, identified as Tank #4, storing miscellaneous fertilizer, with a maximum capacity of 4,800 gallons, using no control, and exhausting outdoors;

(4) One (1) liquid storage tank, identified as Tank #5, storing miscellaneous fertilizer, with a maximum capacity of 25,000 gallons, using no control, and exhausting outdoors;

(5) One (1) liquid storage tank, identified as Tank #6, storing miscellaneous fertilizer, with a maximum capacity of 2,500 gallons, using no control, and exhausting outdoors;

(6) One (1) liquid storage tank, identified as Tank #7, storing miscellaneous fertilizer, with a maximum capacity of 15,000 gallons, using no control, and exhausting outdoors;

(7) One (1) liquid storage tank, identified as Tank #9, storing ammonium thiosulfate, constructed in 2011, with a maximum capacity of 30,000 gallons, using no control, and exhausting outdoors;

(8) One (1) liquid storage tank, identified as Tank #10, storing ammonium thiosulfate, constructed in 2007, with a maximum capacity of 30,000 gallons, using no control, and exhausting outdoors;

(9) One (1) liquid storage tank, identified as Tank #11, storing miscellaneous fertilizer, constructed in 2019, with a maximum capacity of 25,000 gallons, using no control, and exhausting outdoors;

(10) One (1) liquid storage tank, identified as Tank #13, storing fertilizer, constructed in 1978, with a maximum capacity of 1,000,000 gallons, using no control, and exhausting outdoors;

(11) One (1) liquid storage tank, identified as Tank #14, storing UAN, constructed in 1966, with a maximum capacity of 200,000 gallons, using no control, and exhausting outdoors;

(12) One (1) liquid storage tank, identified as Tank #15, storing UAN, constructed in 1966, with a maximum capacity of 200,000 gallons, using no control, and exhausting outdoors;

(13) One (1) liquid storage tank, identified as Tank #16, storing 32% UAN, constructed in 1967, with a maximum capacity of 1,000,000 gallons, using no control, and exhausting outdoors;

(14) One (1) liquid storage tank, identified as Tank #17, storing anhydrous ammonia, constructed in 1978, with a maximum capacity of 30,000 gallons, using no control, and exhausting outdoors; and

(15) One (1) liquid storage tank, identified as Tank #18, storing No. 2 Diesel Fuel, constructed in 2010, with a maximum capacity of 290 gallons, using no control, and exhausting outdoors;

(e) Combustion Units as follows:

(1) One (1) natural gas-fired space heater, rated at 0.08 MMBtu/hr (80k Btu per hour), using no control, and exhausting indoors;
(2) One (1) natural gas-fired space heater, rated at 0.075 MMBt/hr (75k Btu per hour), using no control, and exhausting indoors;

(3) One (1) natural gas-fired space heater, rated at 0.045 MMBtu/hr (45k Btu per hour), using no control, and exhausting indoors.
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 003-41871-00404, 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

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

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

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

B.7 Duty to Provide Information

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(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
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.

(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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to 003-41871-00404 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.,

(b) 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.18 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

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

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.

(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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.
C.12 Instrument Specifications [326 IAC 2-1.1-11]

(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. The analog instrument shall be capable of measuring values outside of the normal range.

(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

C.13 Response to Excursions or Exceedances

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the
Permittee shall 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.

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

(c) 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.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) T-Reactor operation, identified as T-REACTOR (EU-1), installed in 1978, with a maximum capacity of 33 tons per hour, using no control, and exhausting to stack, S-1.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the T-Reactor, EU-1, shall not exceed 40.8 pounds per hour when operating at a process weight rate of 33 tons per hour (66,000 pounds per hour).

The pounds per hour limitation was calculated with the following 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.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Gavilon Fertilizer, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>3300 Bennett Street</td>
</tr>
<tr>
<td>City:</td>
<td>Yoder, Indiana 46798</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(402) 889-4021</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>003-41871-00404</td>
</tr>
</tbody>
</table>

I hereby certify that Gavilon Fertilizer, LLC is:

- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Gavilon Fertilizer, LLC is:

- ☐ in compliance with the requirements of MSOP 003-41871-00404.
- ☐ not in compliance with the requirements of MSOP 003-41871-00404.

Authorized Individual (typed):

| Title:     |                                               |
| Signature: |                                               |
| Date:      |                                               |

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

<table>
<thead>
<tr>
<th>Noncompliance:</th>
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</table>
This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

This facility meets the applicability requirements because it has potential to emit 25 tons/year particulate matter ______, 25 tons/year sulfur dioxide ______, 25 tons/year nitrogen oxides ______, 25 tons/year VOC ______, 25 tons/year hydrocyanic acid ______, 25 tons/year total reduced sulfur ______, 25 tons/year reduced sulfur compounds ______, 25 tons/year fluorides ______, 100 tons/year carbon monoxide ______, 10 tons/year any single hazardous air pollutant ______, 25 tons/year any combination hazardous air pollutant ______, 1 ton/year lead or lead compounds measured as elemental lead ______, or is a source listed under 326 IAC 2-5.1-3(2) ______. Emissions from malfunctioning control equipment or process equipment caused emissions in excess of applicable limitation ______.

This malfunction resulted in a violation of: 326 IAC ______ or, permit condition # ______ and/or permit limit of _______________.

This incident meets the definition of “malfunction” as listed on reverse side ______ Y ______ N.

This malfunction is or will be longer than the one (1) hour reporting requirement ______ Y ______ N.

COMPANY:_________________________________________________________PHONE NO. (      )___________________
LOCATION: (CITY AND COUNTY)_________________________________________________________________________
PERMIT NO. ________________ AFS PLANT ID: ________________ AFS POINT ID: ________________ INSP:__________
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:________________________________________
_____________________________________________________________________________________________________
DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____    _______________ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _______________________________________

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE______/_____/ 20____   _______________ AM/PM

TYPE OF POLLUTANTS EMITTED:   TSP, PM-10, SO2, VOC, OTHER:________________________________________
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _______________________________________
MEASURES TAKEN TO MINIMIZE EMISSIONS:_____________________________________________________________
___________________________________________________________________________________________________
REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____________________________________
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____________________________________
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:__________________________
INTERIM CONTROL MEASURES: (IF APPLICABLE)____________________________________________________________
_____________________________________________________________________________________________________
_____________________________________________________________________________________________________
MALFUNCTION REPORTED BY:__________________________________TITLE:___________________________
(SIGNATURE IF FAXED)
MALFUNCTION RECORDED BY:_______________________DATE:__________________TIME:__________________

*SEE PAGE 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 “Malfunction” definition

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

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

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

________________________________________________________________________
________________________________________________________________________
FUGITIVE DUST CONTROL PLAN
GAVILON FERTILIZER, LLC

Potential fugitive emissions from the unpaved roads are greater than 25 tons per year, therefore Gavilon is subject to 326 IAC 6-5 (Fugitive Particulate Matter Emissions) and is required to submit a fugitive dust control plan that complies with the requirements of 326 IAC 6-5-5 (Contents of Control Plans).

1. **Name and Address of Source** [326 IAC 6-5-5(a)(1)]
   
   Gavilon Fertilizer, LLC  
   3300 Bennett Street  
   Yoder, IN 46798

2. **Name and Address of the Owner or Operator Responsible for the Execution of the Plan** [326 IAC 6-5-5(a)(2)]

   Tim Arnold, Facility Manager  
   Gavilon Fertilizer, LLC  
   3300 Bennett Street  
   Yoder, IN 46798

3. **Process, Operations and Areas Which Have the Potential to Emit Fugitive Particulate Matter** [326 IAC 6-5-5(a)(3)]

   According to 326 IAC 6-4, fugitive dust is the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. Fugitive dust emission sources for the facility include those from paved and/or unpaved roads and parking lots.

4. **Map Showing Areas Where Fugitive Particulate Matter is Generated** [326 IAC 6-5-5(a)(4)]

   Figure 1 shows the facility layout including loading areas, unloading areas, and unpaved haul road routes.

5. **Number and Mix of Vehicular Activity Occurring on Paved Roads, Unpaved Roads, and Parking Lots** [326 IAC 6-5-5(a)(5)]

   The facility will receive raw materials and ship finished product via trucks over unpaved roads. The vehicular traffic generates fugitive emissions of particulate matter (PM), particulate matter with an aerodynamic diameter of 10 microns or less (PM10) and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM2.5). The particulate emission rates have been
calculated based on published equations, emissions factors, and variables for unpaved haul roads (AP-42, Chapter 13.2.1, November 2009) (e.g. “Typical Silt Content and Loading Values for Unpaved Roads at Industrial Facilities,” for sand and gravel processing and number of days with precipitation measuring at least 0.01 inch per year). Haul road lengths are based on the scale of the site diagram in Figure 1. Traffic volume is based upon the raw materials and products that will be shipped into and out of the facility. Potential emission rates are based on the maximum design rate (in tons per year) of each process unit, haul road lengths and vehicle weights. Actual emission rates are based on annual production figures.

6. **Type and Quantity of Material Handled [326 IAC 6-5-5(a)(6)]**

Quantity of material handled (highest actual throughput from the past five years) by truck:

<table>
<thead>
<tr>
<th>Material</th>
<th>(Received)</th>
<th>(Shipped)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anhydrous Ammonia</td>
<td>1,335 tons/yr</td>
<td></td>
</tr>
<tr>
<td>Bulk Liquid Fertilizers</td>
<td>14,940 ton/yr</td>
<td>8,975 tons/yr</td>
</tr>
<tr>
<td>Potash</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ammonium polyphosphate</td>
<td></td>
<td>12,072 ton/yr</td>
</tr>
</tbody>
</table>

7. **Equipment Used to Maintain Pile [326 IAC 6-5-5(a)(7)]**

Gavilon does not use aggregate piles at the facility.

8. **Measures to be Implemented to Control Fugitive Particulate Matter Emissions [326 IAC 6-5-5(a)(8)]**

To control fugitive dust emissions from the unpaved roads and parking lots, the facility will spray water on the roads and parking lots, on an as-needed basis. A water truck or sprinkling system will be used to distribute water on the unpaved roads and parking lots, when needed. The goal of this control measure is to reduce fugitive dust emissions from migrating off the property.


Water will be used to suppress dust.

10. **Specifications of the Particulate Matter Collection Equipment [326 IAC 6-5-5(a)(10)]**

Particulate matter collection equipment is not utilized at the facility.
11. **Schedule of Compliance [326 IAC 6-5-5(a)(11)]**
Gavilon has already implemented the Plan.

12. **Recordkeeping [326 IAC 6-5-5(b)]**
A record will be maintained on site that documents when the control measure is implemented and the dates and times it is conducted. This record will be available upon the request of the IDEM, and will be retained for a minimum of three years.
On September 3, 2019, Gavilon Fertilizer, LLC submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Gavilon Fertilizer, LLC relating to the operation of a stationary bulk fertilizer manufacturing, storage, and distribution plant. Gavilon Fertilizer, LLC was issued its first MSOP (M 003-35185-00404) on March 4, 2015.

**Existing Approvals**

The source was issued MSOP No. M003-35185-00404 on March 4, 2015. The source has since received the following approval:

Significant Permit Revision No. 003-35485-00404 on May 20, 2015.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

**Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

(a) One (1) T-React operation, identified as T-REACTOR (EU-1), installed in 1978, with a maximum capacity of 33 tons per hour, using no control, and exhausting to stack, S-1.

(b) One (1) dry fertilizer operation, identified as DRY FERTILIZER PROCESS (EU3 through EU9), constructed prior to 1960, with a maximum capacity of 40 tons per hour, using no control, exhausting outdoors, and consisting of the following:

1. One (1) underground rail unload pit, identified as RailUnload Pit (EU3), installed in 2004;
2. One (1) enclosed conveyor Drop to Speed King Conveyor, identified as (EU4);
3. One (1) enclosed conveyor, Drop to Leveling Conveyor, identified as (EU5);
4. Three (3) enclosed spouts, identified as (EU6, EU7, EU8);
5. One (1) truck load out conveyor, identified as (EU9).

(c) Fugitive emissions from unpaved roads, identified as (EU-2).
(d) Miscellaneous liquid storage tanks, as follows:

(1) One (1) liquid storage tank, identified as Tank #2, storing miscellaneous fertilizer, constructed in 2002, with a maximum capacity of 16,900 gallons, using no control, and exhausting outdoors;

(2) One (1) liquid storage tank, identified as Tank #3, storing miscellaneous fertilizer, constructed in 2002, with a maximum capacity of 16,900 gallons, using no control, and exhausting outdoors;

(3) One (1) liquid storage tank, identified as Tank #4, storing miscellaneous fertilizer, with a maximum capacity of 4,800 gallons, using no control, and exhausting outdoors;

(4) One (1) liquid storage tank, identified as Tank #5, storing miscellaneous fertilizer, with a maximum capacity of 25,000 gallons, using no control, and exhausting outdoors;

(5) One (1) liquid storage tank, identified as Tank #6, storing miscellaneous fertilizer, with a maximum capacity of 2,500 gallons, using no control, and exhausting outdoors;

(6) One (1) liquid storage tank, identified as Tank #7, storing miscellaneous fertilizer, with a maximum capacity of 15,000 gallons, using no control, and exhausting outdoors;

(7) One (1) liquid storage tank, identified as Tank #9, storing ammonium thiosulfate, constructed in 2011, with a maximum capacity of 30,000 gallons, using no control, and exhausting outdoors;

(8) One (1) liquid storage tank, identified as Tank #10, storing ammonium thiosulfate, constructed in 2007, with a maximum capacity of 30,000 gallons, using no control, and exhausting outdoors;

(9) One (1) liquid storage tank, identified as Tank #11, storing miscellaneous fertilizer, constructed in 2019, with a maximum capacity of 30,000 gallons, using no control, and exhausting outdoors;

(10) One (1) liquid storage tank, identified as Tank #13, storing fertilizer, constructed in 1978, with a maximum capacity of 1,000,000 gallons, using no control, and exhausting outdoors;

(11) One (1) liquid storage tank, identified as Tank #14, storing UAN, constructed in 1966, with a maximum capacity of 200,000 gallons, using no control, and exhausting outdoors;

(12) One (1) liquid storage tank, identified as Tank #15, storing UAN, constructed in 1966, with a maximum capacity of 200,000 gallons, using no control, and exhausting outdoors;

(13) One (1) liquid storage tank, identified as Tank #16, storing 32% UAN, constructed in 1967, with a maximum capacity of 1,000,000 gallons, using no control, and exhausting outdoors;

(14) One (1) liquid storage tank, identified as Tank #17, storing anhydrous ammonia, constructed in 1978, with a maximum capacity of 30,000 gallons, using no control, and exhausting outdoors; and

(15) One (1) liquid storage tank, identified as Tank #18, storing No. 2 Diesel Fuel, constructed in 2010, with a maximum capacity of 290 gallons, using no control, and exhausting outdoors.
(e) Combustion Units as follows:

1. One (1) natural gas-fired space heater, rated at 0.08 MMBtu/hr (80k Btu per hour), using no control, and exhausting indoors;

2. One (1) natural gas-fired space heater, rated at 0.075 MMBt/hr (75k Btu per hour), using no control, and exhausting indoors;

3. One (1) natural gas-fired space heater, rated at 0.045 MMBtu/hr (45k Btu per hour), using no control, and exhausting indoors.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) Miscellaneous liquid storage tanks, as follows:

1. One (1) liquid storage tank, identified as Tank #12, storing EDTA 9%, with a capacity of 6,500 gallons with an unknown construction date;

(b) One (1) Arborite Coating Operation, approved in 2015 for construction, consisting of the following:

1. One (1) Front-end Loader operation, identified as Front-End Loader EU-10, with a maximum throughput of 33 tons per hour, using no control, and exhausting to the atmosphere.

2. One (1) Hopper Bin operation, identified as Hopper Bin EU-11, with a maximum production rate of 33 tons per hour of urea, using no controls, and exhausting to the atmosphere.

3. One (1) Arborite application operation, identified as Arborite Coating EU-12, with a maximum production rate of 33 tons per hour of urea, and a coating material usage rate of Arborite AG-NT of 151.8 pounds per hour, using no controls, exhausting to the atmosphere.

4. One Loadout Process, identified as Coated-Urea Loadout EU-13, with a maximum throughput rate of 33 tons per hour, using no controls, and exhausting to the atmosphere.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Allen County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the annual PM₂.₅ standard.</td>
</tr>
</tbody>
</table>
Pollutant | Designation
---|---
PM$_{2.5}$ | Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM$_{2.5}$ standard.
PM$_{10}$ | Unclassifiable effective November 15, 1990.
NO$_2$ | Unclassifiable or attainment effective January 29, 2012, for the 2010 NO$_2$ standard.
Pb | Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

1Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO$_x$) 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 NO$_x$ emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO$_x$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM$_{2.5}$
Allen County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NO$_x$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Allen County has been classified as attainment or unclassifiable in Indiana for all the 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 (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

The fugitive emissions of criteria pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions
On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.
## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^1, 2$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-Reactor (EU-1)</td>
<td>21.68</td>
<td>21.68</td>
<td>21.68</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1.37</td>
<td></td>
</tr>
<tr>
<td>Dry Fertilizer Process (EU-3 through EU-9)</td>
<td>8.09</td>
<td>3.96</td>
<td>3.96</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NG Combustion</td>
<td>1.6E-3</td>
<td>0.01</td>
<td>0.01</td>
<td>5.2E-4</td>
<td>0.09</td>
<td>4.7E-3</td>
<td>0.07</td>
<td>1.6E-3</td>
</tr>
<tr>
<td>Fifteen (15) Storage Tanks</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.00</td>
<td>1.00</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitive Emissions</strong>*</td>
<td>29.78</td>
<td>25.65</td>
<td>25.64</td>
<td>5.2E-4</td>
<td>0.09</td>
<td>1.00</td>
<td>0.07</td>
<td>1.00</td>
</tr>
<tr>
<td>Fugitives (Haul Roads)</td>
<td>99.14</td>
<td>25.27</td>
<td>2.53</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2.37</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Source-Wide Fugitives</strong>*</td>
<td>128.92</td>
<td>50.92</td>
<td>28.17</td>
<td>5.2E-4</td>
<td>0.09</td>
<td>1.00</td>
<td>0.07</td>
<td>2.37</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 25</td>
</tr>
</tbody>
</table>

1. Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a “regulated air pollutant.”
2. PM$_{2.5}$ listed is direct PM$_{2.5}$.
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, PM, PM10, and PM2.5 is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.
Potential to Emit After Issuance

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)</th>
<th>PM^1</th>
<th>PM_{10}^1</th>
<th>PM_{2.5}^{1,2}</th>
<th>SO\textsubscript{2}</th>
<th>NO\textsubscript{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-Reactor (EU-1)</td>
<td>21.68</td>
<td>21.68</td>
<td>21.68</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.37</td>
</tr>
<tr>
<td>Dry Fertilizer Process (EU-3 through EU-9)</td>
<td>8.09</td>
<td>3.96</td>
<td>3.96</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>NG Combustion</td>
<td>1.6E-3</td>
<td>0.01</td>
<td>0.01</td>
<td>5.2E-4</td>
<td>0.09</td>
<td>4.7E-3</td>
<td>0.07</td>
<td>1.6E-3</td>
</tr>
<tr>
<td>Fifteen (15) Storage Tanks</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.00</td>
<td>-</td>
<td>1.00</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitive Emissions</strong></td>
<td>29.78</td>
<td>25.65</td>
<td>25.64</td>
<td>5.2E-4</td>
<td>0.09</td>
<td>1.00</td>
<td>0.07</td>
<td>2.37</td>
</tr>
<tr>
<td>Fugitives (Haul Roads)</td>
<td>99.14</td>
<td>25.27</td>
<td>2.53</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Source-Wide Fugitives</strong></td>
<td>128.92</td>
<td>50.92</td>
<td>28.17</td>
<td>5.2E-4</td>
<td>0.09</td>
<td>1.00</td>
<td>0.07</td>
<td>2.37</td>
</tr>
<tr>
<td><strong>MSOP Thresholds</strong></td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 25</td>
</tr>
<tr>
<td><strong>PSD Major Source Thresholds</strong></td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
</tr>
</tbody>
</table>

1 Under the Part 70 Permit program (40 CFR 70), PM_{10} and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

2 PM_{2.5} listed is direct PM_{2.5}.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (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 source of HAP, as defined in 40 CFR 63.2, because HAP emissions 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).

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and Prior to May 19, 1978, 40 CFR 60, Subpart K and 326 IAC 12, are not included in the permit for this source, because there were no tanks storing petroleum products constructed during this timeframe.
(b) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after May 18, 1978 and Prior to July 23, 1984, 40 CFR 60, Subpart Ka and 326 IAC 12, are not included in the permit for this source, because there were no tanks storing petroleum products constructed during this timeframe.

(c) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for this source, because there are no tanks with a capacity greater than 75 cubic meters (19,182 gallons) that store petroleum products.

(d) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants from Phosphate Fertilizers Production Plants, 40 CFR 63, Subpart BB, are not included in the permit for this source, because the source is not a major source of HAPs.

(b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 for this source has been reviewed as follows:

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Potential to Emit after Issuance section of this document.

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Potential to Emit after Issuance section of this document.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
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.
326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source was constructed after December 13, 1985 and has potential fugitive particulate emissions of twenty-five (25) tons per year or more. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan that is included as Attachment A to the permit.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

T-Reactor

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the T-Reactor, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the T-Reactor shall not exceed 40.8 pounds per hour when operating at a process weight rate of 33 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

| Emission Unit | P  (tons/hr) | 326 IAC 6-3-2 Allowable PM Emissions (lb/hr) | Uncontrolled PM Emissions (lb/hr) | Control device Required to meet 326 IAC 6-3-2 Requirements?
---|---|---|---|---
EU1 | 33 | 40.8 | 4.95 | No

Dry Fertilizer Process (EU-3 through EU-9)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the dry fertilizer process is not subject to the requirements of 326 IAC 6-3, since the manufacturing processes have a potential to emit less than five hundred fifty-one thousandths (0.551) pounds per hour.

Combustion

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(a), the combustion units are not subject to the requirements of 326 IAC 6-2, since the units are not a source of indirect heating.

Storage Tanks

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)
Pursuant to 8-9-1(a), the storage tanks are not subject to 326 IAC 8-9-1 because the source (located in Newtown County) is not located in one of the following counties: Clark, Floyd, Lake, or Porter.
Compliance Determination and Monitoring Requirements

There are no compliance requirements applicable to this source.

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 September 3, 2019.

The operation of this stationary bulk fertilizer manufacturing, storage, and distribution plant shall be subject to the conditions of the attached proposed MSOP Renewal No. 003-41871-00404.

The staff recommends to the Commissioner that the MSOP Renewal be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Kelcy Tolliver, 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) 234-6679 or (800) 451-6027, and ask for Kelcy Tolliver or (317) 234-6679.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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 Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens' Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
### Appendix A: Emissions Calculations

#### Emission Summary

Source Name: Gavilon Fertilizer, LLC  
Source Location: 3300 Bennett Street, Yoder, Indiana 46798  
Permit Number: 003-41871-00404  
Permit Reviewer: Kelcy Tolliver

<table>
<thead>
<tr>
<th>Process or Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>HAPs</th>
<th>Worst case single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-1 T-Reactor</td>
<td>21.68</td>
<td>21.68</td>
<td>21.68</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.37</td>
</tr>
<tr>
<td>EU-2 Haul Roads (Fugitive)</td>
<td>99.14</td>
<td>25.27</td>
<td>2.53</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>EU-3-9 Dry Fertilizer Process</td>
<td>8.09</td>
<td>3.96</td>
<td>3.96</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>NG Combustion</td>
<td>1.6E-03</td>
<td>0.01</td>
<td>0.01</td>
<td>5.2E-04</td>
<td>0.09</td>
<td>4.7E-03</td>
<td>0.07</td>
<td>1.6E-03</td>
<td>1.5E-03</td>
</tr>
<tr>
<td>Fifteen (15) Storage Tanks</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>&lt;1.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**Total PTE:** 128.92 50.92 28.17 5.2E-04 1.00 0.07 2.37 0.85 Manganese

**Notes:**

1. Potential to Emit calculations are based on maximum design rates.
2. Projected annual emission calculations are based on highest (actual) throughput from the past 5 years.

VOC and HAP emissions from tanks were conservatively estimated to be less than 1 ton per year for VOC and less than 1 ton per year for HAPs.
Appendix A: Emissions Calculations
Methodology of Estimation of HF in T-Reactor

Source Name: Gavilon Fertilizer, LLC
Source Location: 3300 Bennett Street, Yoder, Indiana 46798
Permit Number: 003-41871-00404
Permit Reviewer: Kelcy Tolliver

Scenario
Hydrogen fluoride solution in T-reactor.

Species:
H^+, OH^-, A^-

Equilibrium Equations

Equation 1
\[ K_w = [H^+] [OH^-] \]

Equation 2
\[ K_{a1} = \frac{[H^+] [A^-]}{[HA]} \]

Most fluoride species are completely soluble owing to fluoride's high electronegativity. Therefore, insoluble fluoride species were ignored.

HA to A^- and H^+  \( pK_{a1} = 3.17 \)  \( K_{a1} = 6.76E-04 \)
H_2O to H^+ and OH^-  \( pK_w = 7 \)  \( K_w = 1.00E-07 \)

Charge Balance

Equation 3
\[ [H^+] = [OH^-] + [A^-] \]

Mass Balance

The mass of hydrogen fluoride and fluoride is represented by the following equation:

Equation 4
\[ M = [HA] + [A^-] \]

Solution
Rearranging equation 2 yields:

Equation 5
\[ K_{a1} = \frac{[H^+] [A^-]}{[HA]} \Rightarrow [HA] = \frac{[H^+] [A^-]}{K_{a1}} \]

Equation 6
\[ M = [HA] + [A^-] \Rightarrow M = \frac{[H^+] [A^-]}{K_{a1}} + [A^-] \Rightarrow [A^-] = \frac{M}{K_{a1} + [H^+] + [A^-]} \]

Calculations
\[ \begin{align*}
M & = 0.177 & \text{Based on fluoride concentration in phosphoric acid} \\
K_{a1} & = 6.76E-04 & \text{From "Water Chemistry" by Vernon L. Snoeyink and David Jenkins, by John Wiley and Sons, New York, 1980} \\
pH & = 6.00 & \text{Lowest pH identified in T-reactor evaporator system} \\
[H^+] & = 1.00E-06 & \text{Based on pH = 10^-pH} \\
[A^-] & = 1.77E-01 & \text{Based on Equation 6} \\
HF & = 2.61E-04 & \text{Based on Equation 4} \\
\text{HF as % of F} & = 0.148\% 
\end{align*} \]

# Appendix A: Emissions Calculations

## T-Reactor (EU-1)

**Source Name:** Gavilon Fertilizer, LLC  
**Source Location:** 3300 Bennett Street, Yoder, Indiana 46798  
**Permit Number:** 003-41871-00404  
**Permit Reviewer:** Kelcy Tolliver

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/ton)</th>
<th>Design Throughput (ton/hr)</th>
<th>Potential Hours per Year (hr/yr)</th>
<th>Potential Throughput (ton/yr)</th>
<th>Potential to Emit (PTE) (ton/yr)</th>
<th>Potential Hourly Emission Rate (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM (2)</td>
<td>0.15</td>
<td></td>
<td></td>
<td></td>
<td>21.68</td>
<td>4.95</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt; (2)</td>
<td>0.15</td>
<td></td>
<td></td>
<td></td>
<td>21.68</td>
<td>4.95</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt; (2)</td>
<td>0.15</td>
<td></td>
<td></td>
<td></td>
<td>21.68</td>
<td>4.95</td>
</tr>
<tr>
<td>NH&lt;sub&gt;3&lt;/sub&gt;</td>
<td>0.76</td>
<td></td>
<td></td>
<td></td>
<td>109.85</td>
<td>25.08</td>
</tr>
<tr>
<td>F&lt;sup&gt;-&lt;/sup&gt;</td>
<td>0.001</td>
<td></td>
<td></td>
<td></td>
<td>0.145</td>
<td>0.033</td>
</tr>
<tr>
<td>HF&lt;sup&gt;(4)&lt;/sup&gt;</td>
<td>1.48E-06</td>
<td></td>
<td></td>
<td></td>
<td>2.14E-04</td>
<td>4.88E-05</td>
</tr>
</tbody>
</table>

2. PM<sub>10</sub> was the only particulate emission factor shown in TCEQ's "Calculation Guidance." TCEQ uses PM<sub>10</sub> as a surrogate for PM and PM<sub>2.5</sub>.
3. Design throughput based on maximum design rate.
4. See Table 2b, Single Monoprotic Acid which calculates HF as a fraction of F to be 0.148%

NH<sub>3</sub> = ammonia
F = fluorides
### Hazardous Air Pollutants from Phosphoric Acid Impurities

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Minimum (%)</th>
<th>Maximum (%)</th>
<th>Hazardous Air Pollutant</th>
<th>Potential to Emit (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total P₂O₅</td>
<td>68</td>
<td>70.4</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Iron, as Fe₂O₃</td>
<td>1</td>
<td>3.1</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Aluminum, as Al₂O₃</td>
<td>0.9</td>
<td>1.6</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Magnesium, as MgO</td>
<td>0.2</td>
<td>0.6</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Fluoride, as F</td>
<td>0.08</td>
<td>0.25</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Potassium, as K₂O</td>
<td>0.1</td>
<td>14</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Sulfate, as SO₄</td>
<td>1.8</td>
<td>3.7</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Calcium, as CaO</td>
<td>0.01</td>
<td>0.3</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Specific Gravity @ 75°F 2.00</td>
<td>1.93</td>
<td>2</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Color</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Arsenic</td>
<td>0.00092</td>
<td>0.00092</td>
<td>Yes</td>
<td>0.02</td>
</tr>
<tr>
<td>Barium</td>
<td>0.00001</td>
<td>0.00001</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Boron</td>
<td>0.0047</td>
<td>0.0047</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Chloride</td>
<td>0.001</td>
<td>0.01</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Cadmium</td>
<td>0.0007</td>
<td>0.0111</td>
<td>Yes</td>
<td>0.02</td>
</tr>
<tr>
<td>Cobalt</td>
<td>0.0004</td>
<td>0.0006</td>
<td>Yes</td>
<td>0.01</td>
</tr>
<tr>
<td>Chromium</td>
<td>0.0125</td>
<td>0.0135</td>
<td>Yes</td>
<td>0.29</td>
</tr>
<tr>
<td>Copper</td>
<td>0.0004</td>
<td>0.0004</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Mercury</td>
<td>0.0000171</td>
<td>0.0000171</td>
<td>Yes</td>
<td>0.0004</td>
</tr>
<tr>
<td>Potassium</td>
<td>0.1494</td>
<td>0.1494</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Manganese</td>
<td>0.0393</td>
<td>0.0393</td>
<td>Yes</td>
<td>0.85</td>
</tr>
<tr>
<td>Molybdenum</td>
<td>0.003</td>
<td>0.003</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Sodium</td>
<td>0.1261</td>
<td>0.1261</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Nickel</td>
<td>0.003</td>
<td>0.003</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Lead</td>
<td>0.0011</td>
<td>0.0011</td>
<td>Yes</td>
<td>0.02</td>
</tr>
<tr>
<td>Selenium</td>
<td>0.000042</td>
<td>0.000042</td>
<td>Yes</td>
<td>0.001</td>
</tr>
<tr>
<td>Silicon</td>
<td>0.0122</td>
<td>0.0122</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Strontium</td>
<td>0.00008</td>
<td>0.00008</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Uranium</td>
<td>0.008</td>
<td>0.008</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Vanadium</td>
<td>0.0187</td>
<td>0.0187</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Zinc</td>
<td>0.013</td>
<td>0.085</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>1.23</strong></td>
</tr>
</tbody>
</table>

1. Impurities in the superphosphoric acid (SPA) are assumed to be emitted as particulate matter from the T-Reactor stack in same concentrations as they occur in the SPA. For purposes of the HAP PTE calculation, the concentration of the impurities in the superphosphoric acid were multiplied times the EU-1 T-Reactor particulate matter emissions rate.

\[
3 \text{NH}_4\text{OH} + \text{H}_3\text{PO}_4 \rightarrow (\text{NH}_4)_3\text{PO}_4 + \text{H}_2\text{O}
\]

The effective EF for HAPs from impurities in the phosphoric acid = PTE \div \text{throughput}

\[
\text{EF}_{\text{HAPs from Impurities}} = 1.23 \text{ tpy} \times 2000 \text{ lb/ton} \div 289,080 \text{ ton/year} = 0.0085 \text{ lb/ton}
\]

\[\text{P}_2\text{O}_5 = \text{phosphorous pentoxide}\]
### Emissions Calculations

**Dry Fertilizer Handling (EU-3-9)**

**Source Name:** Gavilon Fertilizer, LLC  
**Source Location:** 3300 Bennett Street, Yoder, Indiana 46798  
**Permit Number:** 003-41871-00404  
**Permit Reviewer:** Kelcy Tolliver

#### Emission Point Details

<table>
<thead>
<tr>
<th>EU#</th>
<th>EP#</th>
<th>SCC#</th>
<th>PM EF(1)</th>
<th>PM EF</th>
<th>PM10 EF</th>
<th>Design Rate</th>
<th>PM Rate</th>
<th>PM10 Rate</th>
<th>PM</th>
<th>PM10</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>(lb/ton)</td>
<td>(lb/ton)</td>
<td>(lb/ton)</td>
<td></td>
<td>(lb/hr)</td>
<td>(lb/hr)</td>
<td>(tpy)</td>
<td>(tpy)</td>
</tr>
</tbody>
</table>

#### Emission Rate Details

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>EU#</th>
<th>EP#</th>
<th>SCC#</th>
<th>PM EF(1)</th>
<th>PM EF</th>
<th>PM10 EF</th>
<th>Design Rate</th>
<th>PM Rate</th>
<th>PM10 Rate</th>
<th>PM</th>
<th>PM10</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(lb/ton)</td>
<td>(lb/ton)</td>
<td>(lb/ton)</td>
<td></td>
<td>(lb/hr)</td>
<td>(lb/hr)</td>
<td>(tpy)</td>
<td>(tpy)</td>
</tr>
</tbody>
</table>

#### Notes:

- IDEM, OAQ does not consider partial or total enclosures as approved control devices. Therefore, no controls are considered for calculating potential emissions.
- **(1)** Gavilon used emission factors from AP-42, Table 11.12-2, Emission Factors for Concrete Batching
- **(2)** Gavilon did not find particle size multipliers emission factor in AP-42 Chapter 11 for PM_{10} for aggregate, and therefore, assumed that PM_{10} = PM_{2.5}.

#### Design Rate:

Gavilon can unload and convey 40 tons/hour of potash. Projected emissions based on highest throughput from past 5 years of 10,101 ton/yr potash.
### Appendix A: Emissions Calculations

**Natural Gas Combustion Only**

**Source Name:** Gavilon Fertilizer, LLC  
**Source Location:** 3300 Bennett Street, Yoder, Indiana 46798  
**Permit Number:** 003-41871-00404  
**Permit Reviewer:** Kelcy Tolliver

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.002</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.01</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.01</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.00</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.09</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.005</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.07</td>
</tr>
</tbody>
</table>

**Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03**

**Methodology**

All emission factors are based on normal firing.  
MMBTu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBTu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### HAPS Calculations

**HAPS - Organics**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>1.804E-06</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>1.031E-06</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>6.441E-05</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>1.564E-03</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>2.920E-06</td>
</tr>
</tbody>
</table>

**Total - Organics**

Total HAPs: 1.616E-03

**HAPS - Metals**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
<td>4.294E-07</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>9.447E-07</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>1.202E-06</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
<td>3.264E-07</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>1.804E-06</td>
</tr>
</tbody>
</table>

**Total - Metals**

Total HAPs: 4.760E-06

**Worst HAP:** 1.546E-03

**Hexane**
## Process Weight Rate Calculation for PM

### Allowable Rate of Emission Based on Process Weight Rate:

For Process Weight > 60,000 lbs/hour

\[
E = 55.0 \times P^{0.11} - 40
\]

Where \( E \) = Allowable PM emission rate (lb/hr) and \( P \) = process weight rate in tons/hr

### Table: Process Weight Rate Calculation for Particulate Sources

| Emission Unit | P (tons/hr) | 326 IAC 6-3-2 Allowable PM Emissions (lb/hr) | Unit PM Emissions Rate (lb/hr) | Control device Required to meet 326 IAC 6-3-2 Requirements?
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-1</td>
<td>33</td>
<td>40.8</td>
<td>4.95</td>
<td>No</td>
</tr>
</tbody>
</table>

(1) Maximum design capacity used.
Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day (vehicle)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>UAN Delivery (Full)</td>
<td>1.0</td>
<td>0.8</td>
<td>4.0</td>
<td>0.16</td>
</tr>
<tr>
<td>UAN Truck Empty</td>
<td>1.0</td>
<td>0.8</td>
<td>4.0</td>
<td>0.16</td>
</tr>
<tr>
<td>Liquid Bulk Fertilizer Delivery (Full)</td>
<td>1.0</td>
<td>75.9</td>
<td>75.9</td>
<td>15.0</td>
</tr>
<tr>
<td>Liquid Bulk Fertilizer Empty</td>
<td>1.0</td>
<td>75.9</td>
<td>75.9</td>
<td>15.0</td>
</tr>
<tr>
<td>Ammonium Nitrate Delivery (Full)</td>
<td>1.0</td>
<td>24.0</td>
<td>24.0</td>
<td>15.0</td>
</tr>
<tr>
<td>Ammonium Nitrate Empty</td>
<td>1.0</td>
<td>24.0</td>
<td>24.0</td>
<td>15.0</td>
</tr>
<tr>
<td>Ammonium Phosphate Shipped (Full)</td>
<td>1.0</td>
<td>38.6</td>
<td>38.6</td>
<td>15.0</td>
</tr>
<tr>
<td>Ammonium Phosphate Empty</td>
<td>1.0</td>
<td>38.6</td>
<td>38.6</td>
<td>15.0</td>
</tr>
<tr>
<td>Liquid Bulk Fertilizer Shipped (Full)</td>
<td>1.0</td>
<td>144.0</td>
<td>144.0</td>
<td>15.0</td>
</tr>
<tr>
<td>Liquid Bulk Fertilizer Empty (Empty)</td>
<td>1.0</td>
<td>144.0</td>
<td>144.0</td>
<td>15.0</td>
</tr>
<tr>
<td>Liquid Bulk Fertilizer Shipped (Empty)</td>
<td>1.0</td>
<td>38.4</td>
<td>38.4</td>
<td>15.0</td>
</tr>
<tr>
<td>Liquid Bulk Fertilizer Empty (Empty)</td>
<td>1.0</td>
<td>38.4</td>
<td>38.4</td>
<td>15.0</td>
</tr>
</tbody>
</table>

**Totals**

| Average Vehicle Weight Per Trip = | 27.5 | tons/trip |
| Average Miles Per Trip = | 3196.8 | miles/vehicle |

Unmitigated Emission Factor, \( E = \left( \frac{40.0}{28.8} \right) \times \left( \frac{0.179}{0.179} \right) \) (Equation 1a from AP-42 13.2.2)

**Methodology**

- **Total Weight driven per day (ton/day)** = \( \left( \text{Maximum one-way distance (mi/trip)} \right) \times \left( \text{Maximum trips per day (trip/day)} \right) \)
- **Total Weight driven per day (ton/day)** = \( \left( \text{Maximum trips per year (trip/year)} \right) \times \left( \text{Maximum one-way distance (mi/trip)} \right) \)
- **Maximum one-way distance (mi/trip)** = \( \left( \text{Maximum Weight of Loaded Vehicle (tons/trip)} \right) \times \left( \text{Average Vehicle Weight Per Trip} \right) \)
- **Average Vehicle Weight Per Trip** = \( \left( \text{Average Weight of Loaded Vehicle (tons/trip)} \right) \times \left( \text{Average Vehicle Weight Per Trip} \right) \)
- **Average Miles Per Trip** = \( \left( \text{Average Weight of Loaded Vehicle (tons/trip)} \right) \times \left( \text{Average Miles Per Trip} \right) \)
- **Maximum one-way distance (mi/trip)** = \( \left( \text{Maximum Weight of Loaded Vehicle (tons/trip)} \right) \times \left( \text{Average Vehicle Weight Per Trip} \right) \)

**Basics**

1. 100% of the anhydrous ammonia is received by truck. Facility can only hold the contents of one truck until the next day. Receipt of anhydrous ammonia trucks is limited by the design capacity of the T-reactor and the capacity of the 12,000 gallon anhydrous ammonia storage tank. The facility can receive a maximum of 3 trucks/day or 0.125 tons/hr of anhydrous ammonia.
2. Bulk liquid fertilizers are rarely received by truck, however, to be conservative, 100% of bulk liquid fertilizers were assumed to be received by truck for purposes of PTE calculations. It takes 15 min for a truck to go all the way through the facility. Potential emissions are based on a maximum shipping rate of 4 trucks per hour or 4 trucks/hr x 24 hrs = 96 truck/day.
3. Micronutrients are blended with liquid fertilizers. For PTE calculation, based on rate at which micronutrients can be pumped to mixing vat. At 80 gal/min x 60 min/hr, micronutrients could be used at a rate of 4800 gal/hr.
4. At a density of 10 tons/t, this equates to 24 ton/hr. Micronutrients is delivered in 40-ton trucks containing approximately 25 tons. The maximum number of one-way trips per hour per vehicle would be 1.
5. Mitigated PTE of PM = [Mitigated PTE of PM (tons/yr)] \times \left[ \left( \text{Total Weight driven per day (ton/day)} \right) \times \left( \text{Average Vehicle Weight Per Trip} \right) \right]
6. Mitigated PTE of PM = [Mitigated PTE of PM (tons/yr)] \times \left[ \left( \text{Maximum one-way distance (mi/trip)} \right) \times \left( \text{Average Vehicle Weight Per Trip} \right) \right]
7. TSI = 33 ton/hr x 8760 hr/yr = 288,060 ton/yr. The maximum trips per hour would be 33 ton/hr divided by 26 ton/hr = 1.26 trip/hr.
8. AP-42, Section 13.2.2 Unpaved Roads, Figure 13.2.2-1, average surface material silt content for sand and gravel processing (November 2006)
9. Control efficiency for wetting of unpaved roads based on Ohio EPA Reasonably Achievable Control Measures (RACM) Table 2.1.1-3. Summary of Techniques, Efficiencies and Costs for Controlling Fugitive Dust from...
October 7, 2019

Mr. Michael Henry  
Gavilon Fertilizer, LLC  
1331 Capitol Avenue  
Omaha, Nebraska  68102

Re: Public Notice  
Gavilon Fertilizer, LLC  
Permit Level: MSOP Renewal  
Permit Number: 003-41871-00404

Dear Mr. Henry:

Enclosed is a copy of your draft MSOP Renewal, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here:  https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Allen county Public Library, Shawnee Branch, 5600 Noll Avenue in Fort Wayne, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Kelcy Tolliver, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6679 or dial (317) 234-6679.

Sincerely,

John F. Jackson  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 4/12/19
October 7, 2019

To: Allen County Public Library, Shawnee Branch

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Gavilon Fertilizer, LLC
Permit Number: PermitNumber

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

October 7, 2019
Gavilon Fertilizer, LLC
003-41871-00404

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
# Mail Code 61-53

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<tr>
<th>IDEM Staff</th>
<th>Gavilon Fertilizer LLC 003-41871-00404 (DRAFT)</th>
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<td>Name and address of Sender</td>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
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<tr>
<td>Type of Mail</td>
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<td>Michael Henry Gavilon Fertilizer LLC 1331 Capitol Ave Omaha NE 68102 (Source CAATS)</td>
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<td>Darin Peterson Vice President Gavilon Fertilizer LLC 4151 Mulberry Dr Ste 240 Kansas City MO 64116 (RO CAATS)</td>
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<td>Daniel &amp; Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)</td>
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<td>Mr. Jeff Coburn Plumbers &amp; Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)</td>
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<td>Roanoke Town Council P.O. Box 328 Roanoke IN 46783 (Local Official)</td>
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<td>Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)</td>
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<td>Fort Wayne-Allen County Health Department 200 E Berry St Suite 380 Fort Wayne IN 46802 (Health Department)</td>
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<td>Carl Gallion 16516 Swank St Yoder IN 46798 (Affected Party)</td>
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<td>Steven Dafforn 16606 Swank St Yoder IN 46798 (Affected Party)</td>
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<td>Andy Drummond 1052 Kenwood Ave Fort Wayne IN 46805 (Affected Party)</td>
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<td>Allen County Public Library - Shawnee Branch 5600 Noll Avenue Fort Wayne IN 46806 (Library)</td>
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