NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a Minor Source Operating Permit (MSOP)

for Consolidated Grain & Barge in Dearborn County

MSOP Renewal No.: M029-41971-00024

The Indiana Department of Environmental Management (IDEM) has received an application from Consolidated Grain & Barge, located at 210 George Street, Aurora, Indiana 47001, for a new source review and renewal of its MSOP issued on January 27, 2010. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Consolidated Grain & Barge to make certain changes at its existing source. Consolidated Grain & Barge has applied to modify grain transfer, handling, and storage emissions units due to an increase in throughput.

This draft permit does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

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

Aurora Public Library
414 2nd Street
Aurora, IN 47001

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

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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 M029-41971-00024 in all correspondence.

Comments should be sent to:

Carson Wright  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Carson Wright or (317) 233-6610  
Or dial directly: (317) 233-6610  
Fax: (317) 232-6749 attn: Carson Wright  
E-mail: ccwright@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 Carson Wright of my staff at the above address.

Josiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality
Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Consolidated Grain & Barge
210 George Street
Aurora, Indiana 47001

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

This permit is issued 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.

<table>
<thead>
<tr>
<th>Operation Permit No.: M029-41971-00024</th>
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<tbody>
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<td>Master Agency Interest ID: 679</td>
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Issued by: Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

<table>
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<tr>
<th>Issuance Date:</th>
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<tbody>
<tr>
<td>Expiration Date:</td>
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An Equal Opportunity Employer
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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 [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary Whole grain handling operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>210 George Street, Aurora, Indiana 47001</th>
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<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(812) 926-0740</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>5153</td>
</tr>
<tr>
<td>County Location:</td>
<td>Dearborn Outside Lawrenceburg Township</td>
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<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
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<td>Source Status:</td>
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<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
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<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
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</tbody>
</table>

A.2 Emission Units and Pollution Control Equipment Summary

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

**Main Dock: Grain Transfer, Handling, and Storage**

(a) One (1) natural gas fired column grain dryer, constructed in 2015, with a maximum heat input rate of 48.0 MMBtu per hour, processing a maximum of 4,700 bushels of grain per hour, using no control, and exhausting through the column wall perforations;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits, identified as Pits #1 and #2, constructed in 1983, with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;

(c) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as Pit # 3, constructed in 2003, with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, and exhausting through stack S-2;

(d) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as Pit # 4, constructed in 2002, approved in 2019 for modification, with a maximum capacity of 600 tons per hour, controlled by choke feeding to control particulate matter, and exhausting indoors;

(e) Two (2) steel storage bins, identified as Nos. 1 and 2, constructed in 1977, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(f) Two (2) steel storage bins, identified as Nos. 3 and 4, constructed in 1983, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(g) Two (2) steel storage bins, identified as Nos. 5 and 6, constructed in 1993, each with a storage capacity of 7560 tons, using no control, and exhausting to the atmosphere;
(h) One (1) steel storage bin, identified as No. 7, constructed in 1998, with a storage capacity of 390 tons, using no control, and exhausting to the atmosphere;

(i) One (1) steel storage bin, identified as No. 8, constructed in 2008, with a storage capacity of 18,403 tons, using no control, and exhausting to the atmosphere;

(j) One (1) steel storage bin, identified as No. 9, constructed in 2012, with a storage capacity of 16,313 tons, using no control, and exhausting to the atmosphere;

(k) Six (6) enclosed reclaim (belt, drag) conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(l) Eight (8) enclosed bin fill spouts, constructed in 1977, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(m) Six (6) enclosed bin fill conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(n) Two (2) enclosed distributors, constructed in 2007, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(o) Four (4) enclosed bucket elevator(s), constructed in 1982, modified in 2012, with maximum capacity of 900 tons per hour, using no control, and exhausting to the atmosphere;

(p) One (1) enclosed wet grain bucket elevator, constructed in 1983 approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere;

(q) One (1) enclosed dry grain bucket elevator, constructed in 1983, approved in 2019 for modification, with maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere;

(r) One (1) enclosed railcar loading spout, constructed in 1983, with a maximum capacity of 540 tons per hour, using no control, and exhausting to the atmosphere;

(s) One (1) enclosed telescoping barge loading spout, constructed in 1983, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;

(t) One (1) covered barge loading belt, constructed in 1993, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;

(u) One (1) covered truck load out belt, constructed in 1998, with a maximum capacity of 170 tons per hour, using no control and exhausting to the atmosphere;

(v) One (1) truck load out spout, constructed in 1993, with a maximum capacity of 540 tons per hour, using no control and exhausting to the atmosphere;

(w) Receiving and shipping of grain by paved roads.

**Dock 4: Bulk Product Transfer, Handling, and Storage**

(x) One (1) 3 cubic yard clamshell bucket crane, identified as E-1, constructed prior to 2004, with maximum capacity of 300 tons per hour for unloading bulk product barges or railcars
and direct loading of trucks and the portable bulk conveyor system, using no control, and exhausting to the atmosphere;

(y) One (1) portable bulk conveyor system, constructed in 2009, consisting of the following:

(1) One (1) portable hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(2) Four (4) portable bulk conveyors, identified as yard conveyors YC-1 through YC-4, with a maximum throughput of 300 tons per hour each, using no control, and exhausting to the atmosphere.

(3) One (1) barge conveyor, identified as barge conveyor C-19, approved in 2019 for modification, with a maximum throughput of 600 tons per hour, using no control, and exhausting to the atmosphere.

(z) Six (6) bulk product storage areas, identified as Storage Areas 1 through 6, constructed in 2011, using no control, and exhausting to the atmosphere;

(aa) Receiving and shipping of bulk products by paved roads;

(bb) One (1) bulk products transfer and storage operation, constructed in 2011, consisting of the following:

(1) Unloading of bulk products from barge or railcar into trucks using clamshell bucket crane E-1, approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere.

(2) Unloading of bulk products from truck to one (1) bulk conveyor, identified as yard conveyor YC-5, approved in 2019 for modification, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(3) One (1) bulk products storage building, identified as Storage Area 7, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(4) Loading of bulk products into one (1) hopper/conditioner with conveyor, identified as HC-1, with a maximum throughput of 120 tons per hour, using front end loaders, exhausting to the indoors of the storage building.

(5) Loading of bulk products into trucks and offsite shipment, with a maximum throughput of 300 tons per hour.
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, M029-41971-00024, 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:
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 M029-41971-00024 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 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.2 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 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.4 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.5 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.6 Fugitive Particulate Matter Emission Limitations  [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.
C.7 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.8 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.9 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.10 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.11 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.12 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.13 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.14 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.15 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.16 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:

**Main Dock: Grain Transfer, Handling, and Storage**

(a) One (1) natural gas fired column grain dryer, constructed in 2015, with a maximum heat input rate of at 48.0 MMBtu per hour, processing a maximum of 4,700 bushels of grain per hour, using no control, and exhausting through the column wall perforations;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits, identified as Pits #1 and #2, constructed in 1983, with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;

(c) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as Pit # 3, constructed in 2003, with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, and exhausting through stack S-2;

(d) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as Pit # 4, constructed in 2002, approved in 2019 for modification, with a maximum capacity of 600 tons per hour, controlled by choke feeding to control particulate matter, and exhausting indoors;

(e) Two (2) steel storage bins, identified as Nos. 1 and 2, constructed in 1977, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(f) Two (2) steel storage bins, identified as Nos. 3 and 4, constructed in 1983, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(g) Two (2) steel storage bins, identified as Nos. 5 and 6, constructed in 1993, each with a storage capacity of 7560 tons, using no control, and exhausting to the atmosphere;

(h) One (1) steel storage bin, identified as No. 7, constructed in 1998, with a storage capacity of 390 tons, using no control, and exhausting to the atmosphere;

(i) One (1) steel storage bin, identified as No. 8, constructed in 2008, with a storage capacity of 18,403 tons, using no control, and exhausting to the atmosphere;

(j) One (1) steel storage bin, identified as No. 9, constructed in 2012, with a storage capacity of 16,313 tons, using no control, and exhausting to the atmosphere;

(k) Six (6) enclosed reclaim (belt, drag) conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(l) Eight (8) enclosed bin fill spouts, constructed in 1977, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(m) Six (6) enclosed bin fill conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;
(n) Two (2) enclosed distributors, constructed in 2007, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(o) Four (4) enclosed bucket elevator(s), constructed in 1982, modified in 2012, with maximum capacity of 900 tons per hour, using no control, and exhausting to the atmosphere;

(p) One (1) enclosed wet grain bucket elevator, constructed in 1983 approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere;

(q) One (1) enclosed dry grain bucket elevator, constructed in 1983, approved in 2019 for modification, with maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere;

(r) One (1) enclosed railcar loading spout, constructed in 1983, with a maximum capacity of 540 tons per hour, using no control, and exhausting to the atmosphere;

(s) One (1) enclosed telescoping barge loading spout, constructed in 1983, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;

(t) One (1) covered barge loading belt, constructed in 1993, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;

(u) One (1) covered truck load out belt, constructed in 1998, with a maximum capacity of 170 tons per hour, using no control and exhausting to the atmosphere;

(v) One (1) truck load out spout, constructed in 1993, with a maximum capacity of 540 tons per hour, using no control and exhausting to the atmosphere;

(w) Receiving and shipping of grain by paved roads.

Dock 4: Bulk Product Transfer, Handling, and Storage

(x) One (1) 3 cubic yard clamshell bucket crane, identified as E-1, constructed prior to 2004, with maximum capacity of 300 tons per hour for unloading bulk product barges or railcars and direct loading of trucks and the portable bulk conveyor system, using no control, and exhausting to the atmosphere;

(y) One (1) portable bulk conveyor system, constructed in 2009, consisting of the following:

   (1) One (1) portable hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

   (2) Four (4) portable bulk conveyors, identified as yard conveyors YC-1 through YC-4, with a maximum throughput of 300 tons per hour each, using no control, and exhausting to the atmosphere.

   (3) One (1) barge conveyor, identified as barge conveyor C-19, approved in 2019 for modification, with a maximum throughput of 600 tons per hour, using no control, and exhausting to the atmosphere.
Emission Limitations and Standards  [326 IAC 2-6.1-5(a)(1)]

D.1.1 Nonattainment Area Limitations Except Lake County [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(d)(2), the Permittee shall comply with the following for operations associated with the grain elevator:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(A) Housekeeping practices shall be conducted as follows:

(i) Areas to be swept and maintained shall include, at a minimum, the following:

(AA) General grounds, yard, and other open areas.

(BB) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.

(CC) Grain driers with respect to accumulated particulate matter.

(ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(2) Six (6) bulk product storage areas, identified as Storage Areas 1 through 6, constructed in 2011, using no control, and exhausting to the atmosphere;

(aa) Receiving and shipping of bulk products by paved roads;

(bb) One (1) bulk products transfer and storage operation, constructed in in 2011, consisting of the following:

(1) Unloading of bulk products from barge or railcar into trucks using clamshell bucket crane E-1, approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere.

(2) Unloading of bulk products from truck to one (1) bulk conveyor, identified as yard conveyor YC-5, approved in 2019 for modification, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(3) One (1) bulk products storage building, identified as Storage Area 7, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(4) Loading of bulk products into one (1) hopper/conditioner with conveyor, identified as HC-1, with a maximum throughput of 120 tons per hour, using front end loaders, exhausting to the indoors of the storage building.

(5) Loading of bulk products into trucks and offsite shipment, with a maximum throughput of 300 tons per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
(iii) Dust from driveways, access roads, and other areas of travel shall be controlled.

(iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(i) Malfunctions.

(ii) Breakdowns.

(iii) Improper adjustment.

(iv) Operating above the rated or designed capacity.

(v) Not following designed operating specifications.

(vi) Lack of good preventive maintenance care.

(vii) Lack of critical and proper spare replacement parts on hand.

(viii) Lack of properly trained and experienced personnel.

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

D.1.2 Particulate Matter Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from each facility used for grain receiving, handling, drying, storage, bin loading, and grain shipping, the bulk conveyor system, the bulk conveyor YC-5, and the hopper/conditioner HC-1 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Particulate Control

(a) In order to comply with condition D.1.2, the baghouses for particulate control shall be in operation and control emissions from the grain dump pits #1, #2 and #3 at all times that the grain dump pits #1, #2 and #3 are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Visible Emissions Notations

(a) Visible emission notations of baghouse exhaust, used in conjunction with grain dump pits #1, #2 and #3, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

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

D.1.6 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the grain dump pits #1, #2 and #3, at least once per day when the processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Bag failure can be indicated by a significant drop in the baghouse’s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records once per day of visible emission notations of the baghouse exhausts, used in conjunction with the three (3) grain dump pits #1, #2 and #3. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the
lack of a visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain records once per day of the pressure drop across the baghouse, used in conjunction with the three (3) grain dump pits #1, #2 and #3. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records 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>Consolidated Grain &amp; Barge</th>
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<tbody>
<tr>
<td>Source Address:</td>
<td>210 George Street</td>
</tr>
<tr>
<td>City:</td>
<td>Aurora, Indiana 47001</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(812) 926-0740</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M029-41971-00024</td>
</tr>
</tbody>
</table>

I hereby certify that Consolidated Grain & Barge is:  
☐ still in operation.  
☐ no longer in operation.

I hereby certify that Consolidated Grain & Barge is:  
☐ in compliance with the requirements of MSOP M029-41971-00024.  
☐ not in compliance with the requirements of MSOP M029-41971-00024.

<table>
<thead>
<tr>
<th>Authorized Individual (typed):</th>
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<tbody>
<tr>
<td>Title:</td>
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<tr>
<td>Signature:</td>
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<tr>
<td>Date:</td>
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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.

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<th>Noncompliance:</th>
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### MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FAX NUMBER: (317) 233-6865**

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 hydrogen sulfide, 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) that emits 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:________________________________________ |
| TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:________________________________________ |
| ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _______________________________________ |
| DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____  AM / PM |
| DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE______/______/ 20____  _______________ AM/PM |
| 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:

________________________________________________________________________
________________________________________________________________________
Attachment A

to MSOP No. M029-41971-00024

FUGITIVE DUST CONTROL PLAN
FUGITIVE DUST PLAN
Consolidated Grain and Barge
Aurora, Indiana

Any offloading of bulk terminal products that generates fugitive dust which crosses our property lines will either be terminated until weather conditions have improved, or alternative acceptable controls are implemented. Water sprinklers will be used as needed to control dust from stockpiles. Fugitive dust generated by trucks operating on gravel roadways will be controlled on an as needed schedule with the application of water spray. The paved roadway surfaces will be swept with a mechanical broom.
On September 26, 2019, Consolidated Grain & Barge 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 Consolidated Grain & Barge relating to the operation of a whole grain handling operation. Consolidated Grain & Barge was issued its First MSOP Renewal (M 029-28523-00024) on January 27, 2010.

### Existing Approvals

The source was issued MSOP Renewal No. M 029-28523-00024 on January 27, 2010. The source has since received the following approval:

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Permit Number</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>MSOP Minor Permit Revision</td>
<td>029-35794-00024</td>
<td>May 19, 2015</td>
</tr>
<tr>
<td>MSOP Revocation</td>
<td>029-35792-00024</td>
<td>May 18, 2015</td>
</tr>
<tr>
<td>MSOP Minor Permit Revision</td>
<td>029-35559-00024</td>
<td>April 30, 2015</td>
</tr>
<tr>
<td>MSOP Notice-Only Change</td>
<td>029-31742-00024</td>
<td>May 11, 2012</td>
</tr>
<tr>
<td>MSOP Notice-Only Change</td>
<td>029-30013-00024</td>
<td>March 24, 2011</td>
</tr>
</tbody>
</table>

### Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

**Main Dock: Grain Transfer, Handling, and Storage**

(a) One (1) natural gas fired column grain dryer, constructed in 2015, with a maximum heat input rate of at 48.0 MMBtu per hour, processing a maximum of 4,700 bushels of grain per hour, using no control, and exhausting through the column wall perforations;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits, identified as Pits #1 and #2, constructed in 1983, with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;

(c) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as Pit # 3, constructed in 2003, with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, and exhausting through stack S-2;
(d) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as Pit # 4, constructed in 2002, approved in 2019 for modification, with a maximum capacity of 600 tons per hour, controlled by choke feeding to control particulate matter, and exhausting indoors;

(e) Two (2) steel storage bins, identified as Nos. 1 and 2, constructed in 1977, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(f) Two (2) steel storage bins, identified as Nos. 3 and 4, constructed in 1983, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(g) Two (2) steel storage bins, identified as Nos. 5 and 6, constructed in 1993, each with a storage capacity of 7560 tons, using no control, and exhausting to the atmosphere;

(h) One (1) steel storage bin, identified as No. 7, constructed in 1998, with a storage capacity of 390 tons, using no control, and exhausting to the atmosphere;

(i) One (1) steel storage bin, identified as No. 8, constructed in 2008, with a storage capacity of 18,403 tons, using no control, and exhausting to the atmosphere;

(j) One (1) steel storage bin, identified as No. 9, constructed in 2012, with a storage capacity of 16,313 tons, using no control, and exhausting to the atmosphere;

(k) Six (6) enclosed reclaim (belt, drag) conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(l) Eight (8) enclosed bin fill spouts, constructed in 1977, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(m) Six (6) enclosed bin fill conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(n) Two (2) enclosed distributors, constructed in 2007, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

(o) Four (4) enclosed bucket elevator(s), constructed in 1982, modified in 2012, with maximum capacity of 900 tons per hour, using no control, and exhausting to the atmosphere;

(p) One (1) enclosed wet grain bucket elevator, constructed in 1983 approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere;

(q) One (1) enclosed dry grain bucket elevator, constructed in 1983, approved in 2019 for modification, with maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere;

(r) One (1) enclosed railcar loading spout, constructed in 1983, with a maximum capacity of 540 tons per hour, using no control, and exhausting to the atmosphere;

(s) One (1) enclosed telescoping barge loading spout, constructed in 1983, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;

(t) One (1) covered barge loading belt, constructed in 1993, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;
One (1) covered truck load out belt, constructed in 1998, with a maximum capacity of 170 tons per hour, using no control and exhausting to the atmosphere;

One (1) truck load out spout, constructed in 1993, with a maximum capacity of 540 tons per hour, using no control and exhausting to the atmosphere;

Receiving and shipping of grain by paved roads.

Dock 4: Bulk Product Transfer, Handling, and Storage

One (1) 3 cubic yard clamshell bucket crane, identified as E-1, constructed prior to 2004, with maximum capacity of 300 tons per hour for unloading bulk product barges or railcars and direct loading of trucks and the portable bulk conveyor system, using no control, and exhausting to the atmosphere;

One (1) portable bulk conveyor system, constructed in 2009, consisting of the following:

1. One (1) portable hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

2. Four (4) portable bulk conveyors, identified as yard conveyors YC-1 through YC-4, with a maximum throughput of 300 tons per hour each, using no control, and exhausting to the atmosphere.

3. One (1) barge conveyor, identified as barge conveyor C-19, approved in 2019 for modification, with a maximum throughput of 600 tons per hour, using no control, and exhausting to the atmosphere.

Six (6) bulk product storage areas, identified as Storage Areas 1 through 6, constructed in 2011, using no control, and exhausting to the atmosphere;

Receiving and shipping of bulk products by paved roads;

One (1) bulk products transfer and storage operation, constructed in 2011, consisting of the following:

1. Unloading of bulk products from barge or railcar into trucks using clamshell bucket crane E-1, approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere.

2. Unloading of bulk products from truck to one (1) bulk conveyor, identified as yard conveyor YC-5, approved in 2019 for modification, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

3. One (1) bulk products storage building, identified as Storage Area 7, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

4. Loading of bulk products into one (1) hopper/conditioner with conveyor, identified as HC-1, with a maximum throughput of 120 tons per hour, using front end loaders, exhausting to the indoors of the storage building.

5. Loading of bulk products into trucks and offsite shipment, with a maximum throughput of 300 tons per hour.
Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;

(b) One (1) portable conveyor for moving petroleum coke and oversize product, from trucks to the bulk storage areas and then to barges, constructed in 2007, with a maximum capacity of 300 tons of materials per hour.

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 Dearborn County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Cannot be classified.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Attainment effective April 7, 2017, for the 2008 8-hour ozone standard for Lawrenceburg Township. Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard for the remainder of the county.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

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 (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Dearborn County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
Dearborn 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 hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

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_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.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>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>Grain Handling and Drying</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
</tr>
<tr>
<td>Bulk Conveyor System</td>
</tr>
<tr>
<td>Bulk Products Handling (non-fugitive)</td>
</tr>
</tbody>
</table>
### Unrestricted Potential Emissions (ton/year)

<table>
<thead>
<tr>
<th>Component</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>Single HAP(^3)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives</td>
<td>117.64</td>
<td>45.34</td>
<td>8.82</td>
<td>0.12</td>
<td>20.61</td>
<td>1.13</td>
<td>17.31</td>
<td>0.37 Hexane</td>
<td>0.39</td>
</tr>
<tr>
<td>Bulk Products Handling (Fugitive)</td>
<td>2.58</td>
<td>1.22</td>
<td>0.18</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Storage Piles</td>
<td>2.31</td>
<td>0.81</td>
<td>0.81</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>113.41</td>
<td>22.68</td>
<td>5.57</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitives</td>
<td>240.22</td>
<td>72.08</td>
<td>15.68</td>
<td>0.12</td>
<td>20.61</td>
<td>1.13</td>
<td>17.31</td>
<td>0.37 Hexane</td>
<td>0.39</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</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>25</td>
<td>&lt; 100</td>
<td>&lt; 10</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\(_{2.5}\).
3. Single highest source-wide HAP.

*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 and PM\(_{10}\) are 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.

### Actual Emissions

No previous emission data has been received from the source.

### Description of Proposed Modification to an Existing Source

The Office of Air Quality (OAQ) has reviewed an application, submitted by Consolidated Grain & Barge on September 26, 2019, relating to the modification of grain transfer, handling, and storage emissions units due to an increase in throughput.

The following is a list of the modified emission units:

(a) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as Pit #4, approved in 2019 for modification, with a maximum capacity of 600 tons per hour, using choke feeding as a control, and exhausting indoors.

(b) One (1) enclosed wet grain bucket elevator, approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere.
(c) One (1) enclosed dry grain bucket elevator, approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere.

(d) One (1) truck load out spout, approved in 2019 for modification, with a maximum capacity of 540 tons per hour, using no control, and exhausting to the atmosphere.

(e) One (1) portable bulk conveyor system, constructed in 2009, consisting of the following:

1. One (1) barge conveyor, identified as barge conveyor C-19, approved in 2019 for modification, with a maximum throughput of 600 tons per hour, using no control, and exhausting to the atmosphere.

(f) One (1) bulk products transfer and storage operation, approved for construction in 2011, consisting of the following:

1. Unloading of bulk products from barge or railcar into trucks using clamshell bucket crane E-1, approved in 2019 for modification, with a maximum capacity of 300 tons per hour, using no control, and exhausting to the atmosphere.

2. Unloading of bulk products from truck to one (1) bulk conveyor, identified as yard conveyor YC-5, approved in 2019 for modification, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

Permit Level Determination – MSOP Significant Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. 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>Process / Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>PTE Increase (Grain Handling and Drying)</td>
<td>31.11</td>
<td>10.18</td>
<td>1.73</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PTE Increase (Bulk Conveyor System)</td>
<td>2.15</td>
<td>1.02</td>
<td>0.16</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PTE Increase (Bulk Products Handling (non-fugitive))</td>
<td>2.57</td>
<td>1.22</td>
<td>0.19</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PTE Increase (Bulk Products Handling (fugitive))</td>
<td>3.86</td>
<td>1.83</td>
<td>0.28</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PTE Increase (Paved roads)</td>
<td>52.64</td>
<td>10.53</td>
<td>2.58</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>
PTE Increase of the Modified Emission Processes (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀</th>
<th>PM₂.₅¹</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP²</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE Increase of the Modified Emission Processes</td>
<td>92.33</td>
<td>24.78</td>
<td>4.93</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

¹PM₂.₅ listed is direct PM₂.₅.
²Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the modification of existing units due to an increase in throughput resulting in an increase in the potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants: PM

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain Handling and Drying</td>
<td>131.61</td>
<td>46.04</td>
<td>7.78</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.39</td>
<td>1.57</td>
<td>1.57</td>
<td>0.12</td>
<td>20.61</td>
<td>1.13</td>
<td>17.31</td>
<td>0.37 Hexane</td>
<td>0.39</td>
</tr>
<tr>
<td>Bulk Conveyor System</td>
<td>15.03</td>
<td>7.11</td>
<td>1.08</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Bulk Products Handling (non-fugitive)</td>
<td>4.29</td>
<td>2.03</td>
<td>0.31</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives</td>
<td>151.33</td>
<td>56.75</td>
<td>10.73</td>
<td>0.12</td>
<td>20.61</td>
<td>1.13</td>
<td>17.31</td>
<td>0.37 Hexane</td>
<td>0.39</td>
</tr>
<tr>
<td>Bulk Products Handling (Fugitive)</td>
<td>6.44</td>
<td>3.05</td>
<td>0.46</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Storage Piles</td>
<td>2.31</td>
<td>0.81</td>
<td>0.81</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>166.05</td>
<td>33.21</td>
<td>8.15</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitives</td>
<td>326.12**</td>
<td>93.81</td>
<td>20.15</td>
<td>0.12</td>
<td>20.61</td>
<td>1.13</td>
<td>17.31</td>
<td>0.37 Hexane</td>
<td>0.39</td>
</tr>
</tbody>
</table>

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.
## Unrestricted Potential Emissions (ton/year) (Uncontrolled/Unlimited)

<table>
<thead>
<tr>
<th></th>
<th>PM&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;&lt;sup&gt;1, 2&lt;/sup&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;3&lt;/sup&gt;</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>Thresholds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PSD Major Source</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Thresholds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."
2. PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.
3. Single highest source-wide HAP.

*Fugitive HAP emissions are always included in the source-wide 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), fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

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

(a) **PSD Applicability**

The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(12)) of PM, including fugitive and non-fugitive emissions, is greater than two hundred fifty (250) tons per year. However, since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1) (PSD), and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of Prevention of Significant Deterioration (PSD) (326 IAC 2-2) applicability. Therefore, the potential to emit particulate matter (PM) without the inclusion of fugitive emissions is one hundred, fifty one and thirty-three hundredths (151.33) tons per year. Consequently, the requirements of 326 IAC 2-2 (PSD) still do not apply to the source and are not included in this renewal.

Note: Pursuant to 326 IAC 2-2-1(w), the term "fugitive particulate emission" refers to those emissions of particulate matter that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

Typical sources of fugitive particulate matter include paved and unpaved roads and parking lots, aggregate storage piles, and material transfer using trucks or front-end loaders. The material conveying system emissions are categorized as "ductable" because it is reasonably possible to enclose the units and capture their emissions.

Fugitive emissions are regulated at the State level through 326 IAC 6-4 (Fugitive Dust Emissions Limitations) and 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) as discussed under the "State Rule Applicability Determination" Section below. A copy of the fugitive dust control plan, required by 326 IAC 6-5, is included as Attachment A to the permit.

(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 Grain Elevators 40 CFR 60, Subpart DD and 326 IAC 12, are not included in the permit for this source, because the source has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum storage capacity of the source is approximately 1.753 million U.S. bushels.

(b) 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 (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDDD and 326 IAC 20-95 are not included in the permit for this source, since the source is not a major source of HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJJ are not included in the permit for this source, since the source does not contain boilers. The source has a natural gas fired grain dryer.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDDD are not included in the permit for this source, since the source is not considered a prepared feeds manufacturing facility as defined by 40 CFR 63.11627.

(c) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 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.

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**State Rule Applicability - Entire Source**

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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).
The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it 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)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads, storage piles, and bulk product handling operation have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source is located in Dearborn County and is not specifically listed in Sections 326 IAC 6.5-2 through 326 IAC 6.5-10. The source has the potential to emit one hundred (100) tons or more, or actual emissions of 910 tons or more of particulate matter (PM) per year. Therefore this source is subject to 326 IAC 6.5-1-2.

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from facility used for grain receiving, handling, drying, storage, bin loading, grain shipping, the portable conveyor, and the bulk conveyor system shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

(b) Pursuant to 326 IAC 6.5-1-2(d)(1) grain elevators that began construction or modification before January 13, 1977 are subject to the requirements of 326 IAC 6.5-1-2(d)(1). This source began construction or modification after January 13, 1977. Therefore, the requirements of 326 IAC 6.5-1-2(d)(1) for grain elevators are not applicable.

(c) Pursuant to 326 IAC 6.5-1-2(d)(2), all grain elevators shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(A) Housekeeping practices shall be conducted as follows:

(i) Areas to be swept and maintained shall include, at a minimum, the following:

(AA) General grounds, yard, and other open areas.
(BB) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
(CC) Grain driers with respect to accumulated particulate matter.

(ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(iii) Dust from driveways, access roads, and other areas of travel shall be controlled.
(iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day’s operation.

(B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(i) Malfunctions.
(ii) Breakdowns.
(iii) Improper adjustment.
(iv) Operating above the rated or designed capacity.
(v) Not following designed operating specifications.
(vi) Lack of good preventive maintenance care.
(vii) Lack of critical and proper spare replacement parts on hand.
(viii) Lack of properly trained and experienced personnel.

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

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Dearborn County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Dearborn County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

### State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1 the one (1) natural gas fired column grain dryer is not a source of indirect heating, because the combustion gasses pass through the dryer directly contacting the material being dried. Therefore, the unit is not subject 326 IAC 6-2.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the facility is not subject to the requirements of 326 IAC 6-3, since it is subject to more stringent particulate limitations set in 326 IAC 6.5.326 IAC 6.5 PM Limitations Except Lake County.

This source is located in Dearborn County and is not specifically listed in Sections 326 IAC 6.5-2 through 326 IAC 6.5-10. The source has the potential to emit one hundred (100) tons or more, or actual emissions of 910 tons or mor of particulate matter (PM) per year. Therefore this source is subject to 326 IAC 6.5-1-2.

Listed below are the allowable limits for the affect facilities.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Stack Flow Rate (acfm)</th>
<th>Allowable Particulate Emission (lb/hr)* (6.5-1-2)</th>
<th>Potential Emissions (lb/hr)**</th>
<th>Controlled Emissions (lb/hr)</th>
<th>Able to Comply</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dump Pits #1 &amp; #2</td>
<td>1200</td>
<td>114,700</td>
<td>29.49</td>
<td>216</td>
<td>2.16</td>
<td>Yes</td>
</tr>
<tr>
<td>Dump Pit #3</td>
<td>600</td>
<td>20,000</td>
<td>5.14</td>
<td>108</td>
<td>1.08</td>
<td>Yes</td>
</tr>
</tbody>
</table>

No other facilities at the source have a stack flow rate used to calculate the 326 IAC 6.5-1-2
Allowable Particulate Emissions

\[ E = \text{Flow rate of stack (acfm)} \times 0.03 \text{ gr/cm} \times 1 \text{ lb / 7000 gr} \times 60 \text{ min / hr}, \text{pursuant to 6.5-2-1} \]

** For purposes of determining compliance with this rule, potential emissions were calculated using the maximum process weight rates for each unit and the PM emission factors, in lb/ton from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1. These calculations do not represent the PTE of the source, which is based on the maximum grain throughput to the source, calculated using guidance from US EPA.

Pursuant to 326 IAC 6.5-1-1(b) Particulate limitations shall not be established for Combustion units that burn only natural gas at sources or facilities identified in 326 IAC 6.5-2 through 326 IAC 6.5-10, as long as the units continue to burn only natural gas. Thusly particulate limitations have not been established for the natural gas fired column grain dryer.

326 IAC 6.5-2 through 326 IAC 6.5-10 (Particulate Matter Limitations Except Lake County)
This source, located in Dearborn County, is not subject to the requirements of 326 IAC 6.5-2 through 326 IAC 6.5-10, since it is not one of the Dearborn County sources listed in 326 IAC 6.5-3

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This source is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, this facility was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-1(a) the facility is not subject to the requirements of 326 IAC 8-2-9 because the facility does not coat metal or plastic parts.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the facility, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the facility, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

(a) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baghouse for particulate matter control for two (2) dump pits (Pits #1 and #2), exhausting through stack S-1</td>
<td>Water Pressure Drop</td>
<td>Daily</td>
<td>0.5 and 6.0 inches</td>
</tr>
<tr>
<td></td>
<td>Visible Emissions</td>
<td></td>
<td>Normal- Abnormal</td>
</tr>
<tr>
<td>Baghouse for particulate matter control for one (1) dump pit (Pit #3), exhausting through stack S-2</td>
<td>Water Pressure Drop</td>
<td>Daily</td>
<td>0.5 and 6.0 inches</td>
</tr>
<tr>
<td></td>
<td>Visible Emissions</td>
<td></td>
<td>Normal- Abnormal</td>
</tr>
</tbody>
</table>
These monitoring conditions are necessary because the bag house for the dump pits must operate properly to assure compliance with 3326 IAC 6.5.

### Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to the A.2, D.1, and D.1.6 sections due to removal and modification of emission units as well as pollution control equipment:

### A.2 Emission Units and Pollution Control Equipment Summary

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

**Main Dock: Grain Transfer, Handling, and Storage**

(a) One (1) natural gas fired column grain dryer, approved in 2015 for construction **constructed in 2015**, with a maximum heat input rate of at 48.0 MMBtu per hour, processing a maximum of 4,700 bushels of grain per hour, using no control, and exhausting through the column wall perforations;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits, identified as Pits #1 and #2, **constructed in 1983**, with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;

(c) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as (Pit # 3), **constructed in 2003**, with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, and exhausting through stack S-2;

(d) One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as (Pit # 4), **constructed in 2002, approved in 2019 for modification**, with a maximum capacity of 450 to 600 tons per hour, controlled by choke feeding to control particulate matter, and **exhausting indoors**;

(e) Two (2) steel storage bins, identified as (ID Nos. 1 and 2), **constructed in 1977**, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(f) Two (2) steel storage bins, identified as (ID Nos. 3 and 4), **constructed in 1983**, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere;

(g) Two (2) steel storage bins, identified as (ID Nos. 5 and 6), **constructed in 1993**, each with a storage capacity of 7560 tons, using no control, and exhausting to the atmosphere;

(h) One (1) steel storage bin, identified as (ID No. 7), **constructed in 1998**, with a storage capacity of 390 tons, using no control, and exhausting to the atmosphere;

(i) One (1) steel storage bin, identified as (ID No. 8), **constructed in 2008**, with a storage capacity of 18,403 tons, using no control, and exhausting to the atmosphere;

(j) One (1) steel storage bin, identified as (ID No. 9), **constructed in 2012**, with a storage capacity of 16,313 tons, using no control, and exhausting to the atmosphere;
Six (6) enclosed reclaim (belt, drag) conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

Eight (8) enclosed bin fill spouts, constructed in 1977, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

Six (6) enclosed bin fill conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

Two (2) enclosed distributors, constructed in 2007, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere;

Four (4) enclosed bucket elevator(s), constructed in 1982, modified in 2012, with maximum capacity of 900 tons per hour, using no control, and exhausting to the atmosphere;

One (1) enclosed wet grain bucket elevator, constructed in 1983, approved in 2019 for modification, with maximum capacity of 240 tons per hour, using no control, and exhausting to the atmosphere;

One (1) enclosed dry grain bucket elevator, constructed in 1983, approved in 2019 for modification, with maximum capacity of 240 tons per hour, using no control, and exhausting to the atmosphere;

One (1) enclosed railcar loading spout, constructed in 1983, with a maximum capacity of 540 tons per hour, using no control, and exhausting to the atmosphere;

One (1) enclosed telescoping barge loading spout, constructed in 1983, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;

One (1) covered barge loading belt, constructed in 1993, with a maximum capacity of 1200 tons per hour, using no control and exhausting to the atmosphere;

One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;

One (1) covered truck load out belt, constructed in 1998, with a maximum capacity of 170 tons per hour, using no control and exhausting to the atmosphere;

One (1) truck load out spout, constructed in 1993, with a maximum capacity of 340 tons per hour, using no control and exhausting to the atmosphere;

Receiving and shipping of grain by paved roads.

Dock 4: Bulk Product Transfer, Handling, and Storage

One (1) 3 cubic yard clamshell bucket crane, identified as E-1, constructed prior to 2004, with maximum capacity of 300 tons per hour for unloading bulk product barges or railcars and direct loading of trucks and the portable bulk conveyor system, using no control, and exhausting to the atmosphere;

One (1) portable conveyor for moving petroleum coke and oversize product, from trucks to the bulk storage areas and then to barges, constructed in 2007, with a maximum capacity of 300 tons of materials per hour;

One (1) portable bulk conveyor system, constructed in 2009, consisting of the following:
(1) One (1) portable hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(2) Four (4) portable bulk conveyors, identified as yard conveyors YC-1 through YC-4, with a maximum throughput of 300 tons per hour each, using no control, and exhausting to the atmosphere.

(3) One (1) barge conveyor, identified as barge conveyor C-19, approved in 2019 for modification, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(bb) Six (6) bulk product storage areas, identified as Storage Areas 1 through 6, constructed in 2011, using no control, and exhausting to the atmosphere;

(ee) Receiving and shipping of bulk products by paved roads;

(dd) One (1) bulk products transfer and storage operation, approved for construction in 2011, consisting of the following:

(1) Unloading of bulk products from barge or railcar into trucks using clamshell bucket crane E-1, approved in 2019 for modification, with a maximum capacity of 120 tons per hour, using no control, and exhausting to the atmosphere.

(2) Unloading of bulk products from truck to one (1) bulk conveyor, identified as yard conveyor YC-5, approved in 2019 for modification, with a maximum throughput of 120 tons per hour, using no control, and exhausting to the atmosphere.

(3) One (1) bulk products storage building, identified as Storage Area 7, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere.

(4) Loading of bulk products into one (1) hopper/conditioner with conveyor, identified as HC-1, with a maximum throughput of 120 tons per hour, using front end loaders, exhausting to the indoors of the storage building.

(5) Loading of bulk products into trucks and offsite shipment, with a maximum throughput of 300 tons per hour.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Main Dock: Grain Transfer, Handling, and Storage

(a) One (1) natural gas fired column grain dryer, approved in 2015 for construction, constructed in 2015, with a maximum heat input rate of 48.0 MMBtu per hour, processing a maximum of 4,700 bushels of grain per hour, using no control, and exhausting through the column wall perforations;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits, identified as Pits #1 and #2, constructed in 1983, with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;
| (c) | One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as (Pit # 3), constructed in 2003, with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, and exhausting through stack S-2; |
| (d) | One (1) grain dump shed (two sided) enclosing one (1) dump pit, identified as (Pit # 4), constructed in 2002, approved in 2019 for modification, with a maximum capacity of 450 tons per hour, controlled by choke feeding to control particulate matter, and exhausting indoors; |
| (e) | Two (2) steel storage bins, identified as (ID Nos. 1 and 2), constructed in 1977, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere; |
| (f) | Two (2) steel storage bins, identified as (ID Nos. 3 and 4), constructed in 1983, each with a storage capacity of 750 tons, using no control, and exhausting to the atmosphere; |
| (g) | Two (2) steel storage bins, identified as (ID Nos. 5 and 6), constructed in 1993, each with a storage capacity of 7560 tons, using no control, and exhausting to the atmosphere; |
| (h) | One (1) steel storage bin, identified as (ID No. 7), constructed in 1998, with a storage capacity of 390 tons, using no control, and exhausting to the atmosphere; |
| (i) | One (1) steel storage bin, identified as (ID No. 8), constructed in 2008, with a storage capacity of 18,403 tons, using no control, and exhausting to the atmosphere; |
| (j) | One (1) steel storage bin, identified as (ID No. 9), constructed in 2012, with a storage capacity of 16,313 tons, using no control, and exhausting to the atmosphere; |
| (k) | Six (6) enclosed reclaim (belt, drag) conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere; |
| (l) | Eight (8) enclosed bin fill spouts, constructed in 1977, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere; |
| (m) | Six (6) enclosed bin fill conveyors, constructed in 1993, modified in 2012, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere; |
| (n) | Two (2) enclosed distributors, constructed in 2007, with maximum capacity of 600 tons per hour, using no control, and exhausting to the atmosphere; |
| (o) | Four (4) enclosed bucket elevator(s), constructed in 1982, modified in 2012, with maximum capacity of 900 tons per hour, using no control, and exhausting to the atmosphere; |
| (p) | One (1) enclosed wet grain bucket elevator, constructed in 1983, approved in 2019 for modification, with maximum capacity of 240 tons per hour, using no control, and exhausting to the atmosphere; |
| (q) | One (1) enclosed dry grain bucket elevator, constructed in 1983, approved in 2019 for modification, with maximum capacity of 240 tons per hour, using no control, and exhausting to the atmosphere; |
(r) One (1) enclosed railcar loading spout, **constructed in 1983**, with a maximum capacity of 540 tons per hour, **using no control**, and exhausting to the atmosphere;

(s) One (1) enclosed telescoping barge loading spout, **constructed in 1983**, with a maximum capacity of 1200 tons per hour, **using no control and exhausting to the atmosphere**;

(t) One (1) covered barge loading belt, **constructed in 1993**, with a maximum capacity of 1200 tons per hour, **using no control and exhausting to the atmosphere**;

(u) One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;

(v) One (1) covered truck load out belt, **constructed in 1998**, with a maximum capacity of 170 tons per hour, **using no control and exhausting to the atmosphere**;

(w) One (1) truck load out spout, **constructed in 1993**, with a maximum capacity of 340 tons per hour, **using no control and exhausting to the atmosphere**;

(x) Receiving and shipping of grain by paved roads.

**Dock 4: Bulk Product Transfer, Handling, and Storage**

(y) One (1) 3 cubic yard clamshell bucket crane, identified as E-1, constructed prior to 2004, with maximum capacity of 300 tons per hour for unloading bulk product barges or railcars and direct loading of trucks and the portable bulk conveyor system, **using no control, and exhausting to the atmosphere**;

(z) One (1) portable conveyor for moving petroleum coke and oversize product, from trucks to the bulk storage areas and then to barges, **constructed in 2007**, with a maximum capacity of 300 tons of materials per hour;

(aa) One (1) portable bulk conveyor system, **constructed in 2009**, consisting of the following:

1. One (1) portable hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour, **using no control, and exhausting to the atmosphere**.

2. Four (4) portable bulk conveyors, identified as yard conveyors YC-1 through YC-4, with a maximum throughput of 300 tons per hour each, **using no control, and exhausting to the atmosphere**.

3. One (1) barge conveyor, identified as barge conveyor C-19, **approved in 2019 for modification**, with a maximum throughput of 300-600 tons per hour, **using no control, and exhausting to the atmosphere**.

(bb) Six (6) bulk product storage areas, identified as Storage Areas 1 through 6, **constructed in 2011**, **using no control, and exhausting to the atmosphere**;

(cc) Receiving and shipping of bulk products by paved roads;

(dd) One (1) bulk products transfer and storage operation, approved for construction in 2011, consisting of the following:
D.1.6 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the grain dump pits #1, #2 and #3, at least once per day when the processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

| (1) | Unloading of bulk products from barge or railcar into trucks using clamshell bucket crane E-1, approved in 2019 for modification, with a maximum capacity of 420 300 tons per hour, using no control, and exhausting to the atmosphere. |
| (2) | Unloading of bulk products from truck to one (1) bulk conveyor, identified as yard conveyor YC-5, approved in 2019 for modification, with a maximum throughput of 120 300 tons per hour, using no control, and exhausting to the atmosphere. |
| (3) | One (1) bulk products storage building, identified as Storage Area 7, with a maximum throughput of 300 tons per hour, using no control, and exhausting to the atmosphere. |
| (4) | Loading of bulk products into one (1) hopper/conditioner with conveyor, identified as HC-1, with a maximum throughput of 120 tons per hour, using front end loaders, exhausting to the indoors of the storage building. |
| (5) | Loading of bulk products into trucks and offsite shipment, with a maximum throughput of 300 tons per hour. |

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

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 26, 2019.

The operation of this whole grain handling operation shall be subject to the conditions of the attached proposed MSOP Renewal No. 029-41971-00024.

The staff recommends to the Commissioner that the New Source Review and MSOP Renewal be approved.
(a) If you have any questions regarding this permit, please contact Carson Wright, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-6610 or (800) 451-6027, and ask for Carson Wright or (317) 233-6610.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM 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.
## Emissions Summary

**Company Name:** Consolidated Grain & Barge Company  
**Source Address:** 210 George Street, Aurora, Indiana 47001  
**MSOP Renewal No.:** M029-41971-00024  
**Reviewer:** Carson Wright

### Uncontrolled/Unlimited Potential to Emit (PTE) (tons/year)*

<table>
<thead>
<tr>
<th>Process Description</th>
<th>PM</th>
<th>PM2.5</th>
<th>PM10</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Hexane</th>
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</thead>
<tbody>
<tr>
<td><strong>Grain Handling and Drying</strong></td>
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<td>46.04</td>
<td>7.78</td>
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<td>1.57</td>
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<td>20.61</td>
<td>0.10</td>
<td>17.31</td>
<td>0.39</td>
<td>0.37</td>
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<tr>
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<td>7.11</td>
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<tr>
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**Fugitive Emissions**

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<th>VOC</th>
<th>CO</th>
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<th>Hexane</th>
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**Total PTE (Non-Fugitive and Fugitive)**

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<th>CO</th>
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<th>Hexane</th>
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<td>1.13</td>
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Notes:

* Potential to Emit (PTE) is based on rated capacity at 8,760 hours/year.  
** The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability. However, since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.  
*** Mitigated PTE (tons/yr) is taking natural mitigation due to precipitation into consideration.  
**** Controlled PTE (tons/yr) pursuant to control measures outlined in fugitive dust control plan.
### Proposed Modification

**Company Name:** Consolidated Grain & Barge Company  
**Source Address:** 210 George Street, Aurora, Indiana 47001  
**MSOP Renewal No.:** M029-41971-00024  
**Reviewer:** Carson Wright

<table>
<thead>
<tr>
<th>Process Description</th>
<th>PM</th>
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<th>PM2.5</th>
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<tr>
<td>Grain Handling and Drying After Modification</td>
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<tr>
<td>Bulk Products Handling (non-fugitive) After Modification</td>
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<td><strong>Fugitive Emissions</strong></td>
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<td>Bulk Products Handling (fugitive) After Modification</td>
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<tr>
<td>Paved Roads Before Modification</td>
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<tr>
<td>Paved Roads After Modification</td>
<td>166.05</td>
<td>33.21</td>
<td>8.15</td>
<td>0.0</td>
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<td>0.0</td>
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**TSD Appendix A: Emission Calculations**

**Grain Elevator Operations**

**Company Name:** Consolidated Grain & Barge Company  
**Source Address:** 210 George Street, Aurora, Indiana 47001  
**MSOP Renewal No.:** M029-41971-00024  
**Reviewer:** Carson Wright

---

### Potential Grain Receiving Throughput

- **Grain Receiving**
  - **Hopper:** 875,000 tons/year  
  - **Straight:** 875,000 tons/year

### Potential Grain Drying Throughput

- **Column Grain Drying:** 56,000 tons/year

### Potential Grain Bin Loading Throughput

- **Grain Bin Loading:** 656,250 tons/year

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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>PM10</td>
<td>PM2.5</td>
<td>PM</td>
</tr>
<tr>
<td>Grain Receiving**</td>
<td>Hopper</td>
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<td>Straight</td>
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**Total Worst Case** 131.61 46.04 7.78  

---

**Methodology:**

Potential Emissions (tons/year) = Throughput (tons/year) \* Emission Factor (lb/ton) \* 1 ton/2000 pounds  
Controlled Emissions (tons/year) = Potential Emissions (tons/year) \* (1-Control Efficiency)

*Throughput is total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities. The source provided this data on November 23, 2009.

As of May 2009, the 5 year maximum amount of grain received was 595,717 tons/year, consisting of corn (425,456 tpy), soybean (159,100 tpy), wheat (11,161 tpy). The potential annual grain received is calculated as 595,717 tpy \* 1.2 = 714,860 tons/year

As of May 2009, the 5 year maximum amount of grain dried was 4953 tons/year. The potential annual grain dried is calculated as 4953 tpy \* 1.2 = 5943 tons/year

**More than one method of shipping and receiving is utilized at the source. The worst-case shipping and receiving scenario has been assumed. For Receiving the source uses Hopper Trucks and Straight Trucks, the emission factor for Straight Trucks is about five times higher than the emission factor for Hopper Trucks; therefore it is assumed that all grain is received by Straight Trucks. The source ships by barge and by rail, the emission factor for shipping and rail are different for each pollutant; Therefore it is assumed that the source uses the shipping method with the worst case emission factor for each pollutant to ship all the grain.

**Emission factors from AP-42 Ch. 9.9.1, Grain Elevators and Processes, Table 9.9.1-1 (3/03)

**Control Efficiency is 99% for grain receiving with the use of enclosure and a baghouse, is 90% for Head House, Grain Handling, Bin Loading, and Grain Shipping equipped with enclosure only, and is 0% for the Column Grain Drying with no control devices.
**Company Name:** Consolidated Grain & Barge Company  
**Source Address:** 210 George Street, Aurora, Indiana 47001  
**MSOP Renewal No.:** M029-41971-00024  
**Reviewer:** Carson Wright

---

### Natural Gas Combustion Only

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<tr>
<td>NOx</td>
<td>100</td>
<td>20.61</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>1.13</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>17.31</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.**  
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32**

**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 - Organics

<table>
<thead>
<tr>
<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>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
</tr>
</tbody>
</table>

### HAPs - Metals

<table>
<thead>
<tr>
<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>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
</tr>
</tbody>
</table>

**Methodology is the same as above.**

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 11/2006) are utilized.

\[ Ef = k^*(0.0032)^*\left[\frac{U}{5}\right]^{1.3} / \left(\frac{M}{2}\right)^{1.4} \]

where:

- \( Ef \) = Emission factor (lb/ton)
- \( k (PM) = 0.74 \) = particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
- \( k (PM10) = 0.35 \) = particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
- \( k (PM2.5) = 0.053 \)
- \( U = 9 \) = worst case annual mean wind speed (Source: NOAA, 2008*)
- \( M = 4.5 \) = material % moisture content of materials (assuming products are similar to coal)**

\[ Ef_{(PM)} = 1.63E-03 \text{ lb PM/ton of material handled} \]
\[ Ef_{(PM10)} = 7.73E-04 \text{ lb PM10/ton of material handled} \]
\[ Ef_{(PM2.5)} = 1.17E-04 \text{ lb PM2.5/ton of material handled} \]

Maximum Material Handling Throughput (YC-1 - YC-4, SCC-1) = 300 tons/hr
Maximum Material Handling Throughput (YC-1 - YC-4, SCC-1) = 2,628,000 tons/yr

<table>
<thead>
<tr>
<th>Type of Activity</th>
<th>Type of Emissions</th>
<th>Uncontrolled PTE of PM (tons/yr)</th>
<th>Uncontrolled PTE of PM10 (tons/yr)</th>
<th>Uncontrolled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hopper w/Belt Feeder (SCC-1)</td>
<td>Non-Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Conveyor #1 (YC-1)</td>
<td>Non-Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Conveyor #2 (YC-2)</td>
<td>Non-Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Conveyor #3 (YC-3)</td>
<td>Non-Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Conveyor #4 (YC-4)</td>
<td>Non-Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Barge Conveyor #5 (C-19)</td>
<td>Non-Fugitive</td>
<td>4.29</td>
<td>2.03</td>
<td>0.31</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>15.03</td>
<td>7.11</td>
<td>1.08</td>
</tr>
</tbody>
</table>

**Methodology**

Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

*Worst case annual mean wind speed (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008
*Worst case moisture content of bulk products assumed equal to coal

**Abbreviations**

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit
Bulk Products Transfer to Storage Area 7
(fertilizer pellets, salt, aggregate, bagged products, and specialty products)

**Particulate Emissions**

**Company Name:** Consolidated Grain & Barge Company  
**Source Address:** 210 George Street, Aurora, Indiana 47001  
**MSOP Renewal No.:** M029-41971-00024  
**Reviewer:** Carson Wright

**Drop Operations (AP-42 Section 13.2.4)**

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 11/2006) are utilized.

\[
Ef = k*(0.0032)\frac{(U/5)^{1.3}}{(M/2)^{1.4}}
\]

where:
- \( Ef \) = Emission factor (lb/ton)
- \( k \) (PM) = particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
- \( k \) (PM10) = particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
- \( k \) (PM2.5) = particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
- \( U \) = worst case annual mean wind speed (Source: NOAA, 2008*)
- \( M \) = material % moisture content of materials (assuming products are similar to coal)**

Maximum Material Handling Throughput = 300 tons/hr  
Maximum Material Handling Throughput = 2,628,000 tons/yr

<table>
<thead>
<tr>
<th>Type of Activity</th>
<th>Type of Emissions</th>
<th>Uncontrolled PTE of PM (tons/yr)</th>
<th>Uncontrolled PTE of PM10 (tons/yr)</th>
<th>Uncontrolled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unloading bulk products from barge to truck using clamshell (Barge Dock 4)</td>
<td>Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Unloading bulk products from truck to portable conveyor (Storage Area 7)</td>
<td>Non-Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Unloading bulk products from conveyor to stacker tube storage pile (Storage Area 7)</td>
<td>Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Loading bulk products into conditioner/loadout conveyor hopper using front end loaders (Storage Area 7)</td>
<td>Non-Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
<tr>
<td>Unloading bulk products from loadout conveyor to trucks (Storage Area 7)</td>
<td>Fugitive</td>
<td>2.15</td>
<td>1.02</td>
<td>0.15</td>
</tr>
</tbody>
</table>

Total Fugitive Emissions (tons/yr) 6.44 3.05 0.46  
Total Non-Fugitive Emissions (tons/yr) 4.29 2.03 0.31

**Methodology**

Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) \* (Emission Factor (lb/ton)) \* (tons/2000 lbs)

*Worst case annual mean wind speed (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PTE = Potential to Emit
Fugitive Dust Emissions from Storage Pile Wind Erosion

Material Storage Piles (AP-42 Section 11.2.3)

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

\[ Ef = 1.7*(s/1.5)*(365-p)/235*(f/15) \]

where

- \( Ef \) = emission factor (lb/acre/day)
- \( s \) = silt content (wt %)
- \( p \) = days of rain greater than or equal to 0.01 inches
- \( f \) = % of wind greater than or equal to 12 mph

Storage Area | Materials | Worst Case Silt Content (wt %)* | Emission Factor (lb/acre/day) | Maximum Anticipated Pile Size (acres)** | Unlimited PTE of PM (Before Control) (tons/yr) | Unlimited PTE of PM10/PM2.5 (Before Control) (tons/yr)
--- | --- | --- | --- | --- | --- | ---
Storage Area 1 | pig iron, ferro alloys | 1.0 | 1.16 | 1.00 | 0.211 | 0.074
Storage Area 2 | coke, coal, pig iron | 4.6 | 5.32 | 1.00 | 0.972 | 0.340
Storage Area 3 | bagged and specialty products | 1.0 | 1.16 | 0.50 | 0.106 | 0.037
Storage Area 4 | coal, ferro alloys, pig iron, gypsum | 4.6 | 5.32 | 0.25 | 0.243 | 0.085
Storage Area 5 | Salt, coal | 4.6 | 5.32 | 0.30 | 0.292 | 0.102
Storage Area 6 | pig iron, ferro alloys | 4.6 | 5.32 | 0.50 | 0.486 | 0.170

**Totals PTE (Before Control)** = 2.31 0.81

\[ \text{Dust Control Efficiency} = \frac{\text{Totals PTE (After Control)}}{\text{Totals PTE (Before Control)}} \times 100\% \]

\[ \text{Totals PTE (After Control)} = 1.15 0.40 \]

Note: At Storage Area 7, fertilizer pellets, salt, aggregate, bagged products, and specialty are stored within an enclosed building. Therefore, storage area 7 has no fugitive dust emissions from wind erosion.

Methodology

Unlimited PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)

Unlimited PTE of PM10 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%

*Worst case silt content values are from AP-42 Table 13.2.4-1 (dated 11/2006) as follows:
- Storage Area 1: pig iron and ferro alloys assumed equal to limestone at a stone quarrying and processing facility
- Storage Area 2: coke, coal, and pig iron assumed equal to coal at a iron and steel production facility
- Storage Area 3: bagged and specialty products assumed equal to limestone at a stone quarrying and processing facility
- Storage Areas 4, 5, 6: coke, coal, and ferro alloys assumed equal to coal at a iron and steel production facility

**Maximum pile size (acres) provided by the source
### Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Vehicle Type</th>
<th>Maximum Weight of Vehicle (tons)</th>
<th>Maximum Weight of Load (tons)</th>
<th>Maximum trips per year (trip/yr)</th>
<th>Maximum Weight of Vehicle and Load (tons/trip)</th>
<th>Total Weight driven per year (ton/yr)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way distance (miles/yr)</th>
<th>Maximum Weight of Load (tons/trip)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain truck entering site full</td>
<td>Grain Tanker (5 axle bulk dry tanker)</td>
<td>14.0</td>
<td>26.0</td>
<td>40.0</td>
<td>3.4E+04</td>
<td>1.36E+06</td>
<td>600</td>
<td>0.11</td>
<td>3824.3</td>
<td></td>
</tr>
<tr>
<td>Grain truck leaving site empty</td>
<td>Grain Tanker (5 axle bulk dry tanker)</td>
<td>14.0</td>
<td>0.0</td>
<td>14.0</td>
<td>3.4E+04</td>
<td>4.7E+05</td>
<td>800</td>
<td>0.15</td>
<td>5200.1</td>
<td></td>
</tr>
<tr>
<td>Onsite utility/maintenance pickup truck (10 one-way trips per day)</td>
<td>Pickup Truck</td>
<td>3.0</td>
<td>0.0</td>
<td>3.0</td>
<td>3.1E+03</td>
<td>1.5E+05</td>
<td>500</td>
<td>0.47</td>
<td>2588.9</td>
<td></td>
</tr>
<tr>
<td>Worst case offsite product truck traveling to storage areas 5</td>
<td>Dump truck (16 CY)</td>
<td>14.0</td>
<td>0.0</td>
<td>14.0</td>
<td>1.1E+05</td>
<td>1.36E+06</td>
<td>1500</td>
<td>0.11</td>
<td>16467.2</td>
<td></td>
</tr>
<tr>
<td>Worst case onsite product transfer truck transporting material to storage area 7</td>
<td>Dump truck (16 CY)</td>
<td>14.0</td>
<td>26.0</td>
<td>40.0</td>
<td>1.0E+05</td>
<td>1.0E+06</td>
<td>2500</td>
<td>0.47</td>
<td>11118.5</td>
<td></td>
</tr>
</tbody>
</table>

Total Emission Factor, $E_f = \frac{\text{Maximum one-way miles (miles/yr)}}{\text{Maximum Weight of Load (tons/trip)}} * \frac{\text{Maximum Weight of Load (tons)}}{\text{Maximum Weight of Vehicle and Load (tons/trip)}} * \frac{\text{Maximum Weight of Load (tons)}}{\text{Maximum Weight of Load (tons/trip)}}

$\text{Unmitigated PTE of PM} = \frac{\text{Maximum one-way miles (miles/yr)}}{\text{Maximum Weight of Load (tons/trip)}} * \frac{\text{Maximum Weight of Load (tons)}}{\text{Maximum Weight of Load (tons/trip)}} * \frac{\text{Maximum Weight of Load (tons)}}{\text{Maximum Weight of Load (tons/trip)}}$

**Methodology**

- **Unmitigated Maximum Weight of Vehicle and Load (tons/yr)**: $\text{Maximum Weight of Vehicle (tons/yr)} + \text{Maximum Weight of Load (tons/yr)}$
- **Unmitigated Maximum one-way distance (miles/yr)**: $\text{Maximum one-way distance (mi/trip)} * \text{Maximum trips per year (trip/yr)}$
- **Unmitigated PTE of PM (tons/yr)**: $\text{Unmitigated Maximum Weight of Load (tons/yr)} * \text{Unmitigated Maximum one-way distance (miles/yr)}$
- **Controlled PTE of PM (tons/yr)**: $\text{Controlled Maximum Weight of Load (tons/yr)} * \text{Controlled Maximum one-way distance (miles/yr)}$

**Abbreviations**

- **PM**: Particulate Matter
- **PM2.5**: Particle Matter (<2.5 um)
- **PM10**: Particulate Matter (<10 um)
- **PTE**: Potential to Emit
### Emission Calculations

**Company Name:** Consolidated Grain & Barge Company  
**Source Address:** 210 George Street, Aurora, Indiana 47001  
**MSOP Renewal No.:** M029-41971-00024  
**Reviewer:** Carson Wright

<table>
<thead>
<tr>
<th>Facility</th>
<th>Maximum Process Weight Rate (tons/hr)</th>
<th>Stack Flow Rate (acfm)</th>
<th>Allowable Particulate Emission (grains/dscf) (326 IAC 6.5-1-2)</th>
<th>Allowable Particulate Emission (lb/hr)* (326 IAC 6.5-1-2)</th>
<th>Uncontrolled PM Emission Factor (lb/ton)</th>
<th>Potential PM Emissions (lb/hr)**</th>
<th>Control Device</th>
<th>Control Efficiency</th>
<th>Controlled PM Emissions (lb/hr)</th>
<th>Able to Comply?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Column Grain Dryer</td>
<td>141</td>
<td>226200</td>
<td>0.03</td>
<td>58.17</td>
<td>0.22</td>
<td>31.02</td>
<td>Perforation Plate***</td>
<td>0%</td>
<td>31.02</td>
<td>yes</td>
</tr>
<tr>
<td>Dump Pits #1 &amp; #2</td>
<td>1200</td>
<td>114700</td>
<td>0.03</td>
<td>29.49</td>
<td>0.18</td>
<td>216.00</td>
<td>Enclosure &amp; Baghouse</td>
<td>99.0%</td>
<td>2.16</td>
<td>yes</td>
</tr>
<tr>
<td>Dump Pit #3</td>
<td>600</td>
<td>20000</td>
<td>0.03</td>
<td>5.14</td>
<td>0.18</td>
<td>108.00</td>
<td>Enclosure &amp; Baghouse</td>
<td>99.0%</td>
<td>1.08</td>
<td>yes</td>
</tr>
</tbody>
</table>

*E= Flow rate of stack (acfm) * .03 gr/cm * 1 lb / 7000 gr * 60 min / hr, pursuant to 6.5-2-1

** For purposes of determining compliance with this rule, potential emissions were calculated using the maximum hourly process weight rates for each unit and the uncontrolled PM emission factors (in lb/ton) from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1. These calculations do not represent the uncontrolled annual PTE of the source, which is based on the 5 year maximum amount of grain received by the source multiplied by a factor of 1.2, calculated pursuant a US EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities.

***The column grain dryer is equipped with column plate perforations that may provide some particulate control. However, the source is not claiming any particulate control. Therefore the particulate control efficiency for the column plate perforations is assumed to be 0%.
December 4, 2019

Mr. Christopher Gehret
Consolidated Grain & Barge
210 George Street
Aurora, Indiana 47001

Re: Public Notice
Consolidated Grain & Barge
Permit Level: MSOP Renewal w/ Sig NSR
Permit Number: 029-41971-00024

Dear Mr. Gehret:


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 Aurora Public Library, 414 2nd Street in Aurora, 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 Mr. Carson Wright, 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 3-6610 or dial (317) 233-6610.

Sincerely,

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
December 4, 2019

To: Aurora Public Library

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: Consolidated Grain & Barge
 Permit Number: 029-41971-00024

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
Notice of Public Comment

December 4, 2019
Consolidated Grain & Barge
029-41971-00024

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.

Enclosure
PN AAA Cover Letter 4/12/2019
Mail Code 61-53

<table>
<thead>
<tr>
<th>IDEM Staff</th>
<th>JJACKSON 12/4/2019</th>
<th>CONSOLIDATED GRAIN &amp; BARGE CO 0294197-00024 (DRAFT)</th>
<th>AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING</th>
</tr>
</thead>
<tbody>
<tr>
<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>
<td>Type of Mail: CERTIFICATE OF MAILING ONLY</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Christopher Gehret CONSOLIDATED GRAIN &amp; BARGE CO 210 George St Aurora IN 47001 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Michael &amp; Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Aurora Public Library 414 Second St Aurora IN 47001-1384 (Library)</td>
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<td>Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)</td>
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<td>Dearborn County Health Department 215-b. W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 (Health Department)</td>
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<td>Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)</td>
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<td>Aurora City Council and Mayors Office P.O. Box 158 Aurora IN 47001 (Local Official)</td>
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<td>Ken &amp; Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)</td>
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<td>Marlin M. Guss, Jr. 10400 Millstone Dr. P.O. Box 272 Aurora IN 47001 (Affected Party)</td>
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<td>Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)</td>
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<td>Sam &amp; Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)</td>
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<td>Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)</td>
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<td>Mr. Bill Ulrich Dearborn County Council VP 103 Deborah Dr. Aurora IN 47001 (Affected Party)</td>
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<td>Chandra Mattingly Rising Sun Recorder and Ohio County News 235 Main St Rising Sun IN 47040 (Affected Party)</td>
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