NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Bunge North America (East), LLC in DeKalb County

MSOP Renewal No.: M 033-43580-00004

The Indiana Department of Environmental Management (IDEM) has received an application from Bunge North America (East), LLC located at 4743 County Road 28, Waterloo, Indiana 46793 for a renewal of its MSOP issued on April 12, 2016. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Bunge North America (East), LLC to continue to operate its existing source.

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

A copy of the permit application and IDEM's preliminary findings have been sent to:

Waterloo-Grant Township Public Library
300 South Wayne Street
Waterloo, Indiana 46793

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access 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 M 033-43580-00004 in all correspondence.

Comments should be sent to:

Wilfredo de la Rosa  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Wilfredo de la Rosa or (317) 232-8422  
Or dial directly: (317) 232-8422  
Fax: (317) 232-6749 attn: Wilfredo de la Rosa  
E-mail: wdelaros@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 and will also be sent to the local library indicated above, the IDEM Regional Office 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 Wilfredo de la Rosa 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

Bunge North America (East), LLC
4743 County Road 28
Waterloo, Indiana, Indiana 46793

(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.

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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 Grain Handling Facility.

- Source Address: 4743 County Road 28, Waterloo, Indiana, Indiana 46793
- General Source Phone Number: 260-837-2900
- SIC Code: 5153 (Grain and Field Beans)
- County Location: DeKalb
- Source Location Status: Attainment for all criteria pollutants
- Source Status: Minor Source Operating Permit Program
  - Minor Source, under PSD and Emission Offset Rules
  - Minor Source, Section 112 of the Clean Air Act
  - Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Grain receiving operation, identified as F001, with a maximum receiving rate of 16,029,333 bushels of grain per year (51.24 tons per hour), and consisting of the following:

1. Two (2) truck receiving stations, identified as Pits 1 and 2, approved in 2016 for construction, each with a maximum capacity of 750 tons per hour.
2. One (1) truck receiving station, identified as Pit 3, constructed before 1977, and permitted in 2016, with a maximum capacity of 450 tons per hour.
3. One (1) railcar receiving station, with a maximum capacity of 450 tons per hour.

(b) Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:

1. Two (2) totally enclosed grain elevator legs, identified as P1-1a and P1-1b, approved in 2016 for construction, each with a capacity of 25,000 bushels per hour each (700 tons per hour each).
2. One (1) totally enclosed grain elevator dry leg, identified as P1-1c, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
3. One (1) totally enclosed grain elevator wet leg, identified as P1-1d, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
(4) One (1) totally enclosed rail loadout leg, identified as P1-1e, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).

(5) One (1) totally enclosed Inter Systems Cleaner, identified as P1-1s, constructed before 1977, with a maximum capacity of 40,000 bushels per hour (1120 tons per hour).

(6) One (1) totally enclosed Pit 1 drag conveyor, identified as P1-1f, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(7) One (1) totally enclosed Pit 2 drag conveyor, identified as P1-1g, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(8) One (1) totally enclosed Receiving 1 drag conveyor, identified as P1-1h, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(9) One (1) totally enclosed Receiving 2 drag conveyor, identified as P1-1i, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(10) One (1) totally enclosed East 1 Distribution drag conveyor, identified as P1-1j, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(11) One (1) totally enclosed East 2 Distribution drag conveyor, identified as P1-1k, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(12) One (1) totally enclosed Riley drag conveyor, identified as P1-1l, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(13) One (1) totally enclosed Riley drag conveyor, identified as P1-1m, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(14) One (1) totally enclosed pile drag conveyor, identified as P1-1n, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(15) One (1) totally enclosed ground pile drag conveyor, identified as P1-1o, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(16) One (1) totally enclosed ground pile reclaim drag conveyor, constructed in 2019, permitted in 2021, with a capacity of 25,000 bushels per hour (700 tons per hour).

(17) One (1) totally enclosed Reclaim 2 belt conveyor, identified as P1-1p, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(18) One (1) totally enclosed Receiving belt conveyor, identified as P1-1q, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
(19) One (1) totally enclosed 7-8-9 East Reclaim drag conveyor, approved in 2016 for construction, identified as P1-1r, with a capacity of 25,000 bushels per hour (700 tons per hour).

(20) One (1) totally enclosed West feed conveyor, identified as P1-1t, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(21) One (1) totally enclosed 401 feed conveyor, identified as P1-1w, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(22) One (1) totally enclosed 4-5-6 side tap drag conveyor, identified as P1-1x, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(23) One (1) totally enclosed West Reclaim drag conveyor, identified as P1-1z, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(24) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).

(25) One (1) totally enclosed Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).

(26) One (1) totally enclosed Rail Reclaim conveyor, approved in 2016 for construction, identified as P1-1v, with a capacity of 15,000 bushels per hour (420 tons per hour).

(27) One (1) totally enclosed Dryer Feed conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(28) One (1) totally enclosed Dryer Discharge conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(29) One (1) totally enclosed existing 7-8-9 side tap conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1,680 tons per hour).

(30) One (1) totally enclosed 301 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).

(31) One (1) totally enclosed 302 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).

(c) Grain Storage System, identified as F003, constructed before 1977 and modified in 1994, with a total storage capacity of 2.2 million bushels (61,600 tons), controlled by enclosures, and consisting of the following:

(1) Two (2) steel storage bins, identified as Bins 1001 and 1101, constructed before 1977 and modified in 1994, each with a storage capacity of 600,000 bushels (1680 tons).

(2) Three (3) concrete storage silos, identified as Bins 401, 501, and 601, constructed before 1977 and modified in 1994, each with a storage capacity of 91,000 bushels (2548 tons).
Three (3) concrete storage silos, identified as Bins 701, 801, and 901, constructed before 1977 and modified in 1994, each with a storage capacity of 162,000 bushels (4536 tons).

Three (3) concrete storage silos, identified as Bins 101, 301, and 302, constructed before 1977 and modified in 1994, each with a storage capacity of 27,000 bushels (756 tons).

Four (4) concrete storage silos, identified as Bins 202, 203, 204, and 205, constructed before 1977 and modified in 1994, each with a storage capacity of 5,000 bushels (140 tons).

One (1) concrete storage silo, identified as Bin 102A/102B, constructed before 1977 and modified in 1994, with a storage capacity of 25,000 bushels (700 tons).

One (1) concrete storage silo, identified as Bin 201, constructed before 1977 and modified in 1994, with a storage capacity of 7,600 bushels (212.8 tons).

Two (2) temporary open grain storage piles, identified as F004, constructed before 1977, with a total maximum storage capacity of 2,200,000 bushels of grain (61,600 tons).

One (1) Zimmerman grain dryer, identified as F005, approved in 2016 for construction, with a perforated screen plate (column dryer) and a maximum drying capacity of 10,000 bushels of grain per hour (300 tons per hour). The dryer burner burns natural gas and has a maximum heat input capacity of 108 MMBtu per hour.

Grain Loadout operation, with a maximum capacity of 60,000 bushels per hour (1680 tons per hour), constructed before in 1977 and modified in 1994 and 2005, and consisting of the following:

One (1) Railcar Loadout site, identified as F006, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.

One (1) Truck Loadout site, identified as F007, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.

One (1) Rail Loading scale system, identified as P1-1uk, constructed in 1977, modified in 1994 and 2005, and totally enclosed in 2017 to control PM emissions.

Unpaved roads and parking lots with public access.
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, M 033-43580-00004, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.3 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

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

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

B.4 Enforceability
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source’s potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information
(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 M 033-43580-00004 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.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

**Entire Source**

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

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

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

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

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

1. Violation of any conditions of this permit.
2. Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
3. 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.
4. Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
5. For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

### C.3 Opacity [326 IAC 5-1]

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

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

### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.
C.6 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 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(c).

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

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:**

(a) Grain receiving operation, identified as F001, with a maximum receiving rate of 16,029,333 bushels of grain per year (51.24 tons per hour), and consisting of the following:

1. Two (2) truck receiving stations, identified as Pits 1 and 2, approved in 2016 for construction, each with a maximum capacity of 750 tons per hour.
2. One (1) truck receiving station, identified as Pit 3, constructed before 1977, and permitted in 2016, with a maximum capacity of 450 tons per hour.
3. One (1) railcar receiving station, with a maximum capacity of 450 tons per hour.

(b) Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:

1. Two (2) totally enclosed grain elevator legs, identified as P1-1a and P1-1b, approved in 2016 for construction, each with a capacity of 25,000 bushels per hour each (700 tons per hour each).
2. One (1) totally enclosed grain elevator dry leg, identified as P1-1c, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
3. One (1) totally enclosed grain elevator wet leg, identified as P1-1d, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
4. One (1) totally enclosed rail loadout leg, identified as P1-1e, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
5. One (1) totally enclosed Inter Systems Cleaner, identified as P1-1s, constructed before 1977, with a maximum capacity of 40,000 bushels per hour (1120 tons per hour).
6. One (1) totally enclosed Pit 1 drag conveyor, identified as P1-1f, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
7. One (1) totally enclosed Pit 2 drag conveyor, identified as P1-1g, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
8. One (1) totally enclosed Receiving 1 drag conveyor, identified as P1-1h, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
9. One (1) totally enclosed Receiving 2 drag conveyor, identified as P1-1i, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
(10) One (1) totally enclosed East 1 Distribution drag conveyor, identified as P1-1j, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(11) One (1) totally enclosed East 2 Distribution drag conveyor, identified as P1-1k, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(12) One (1) totally enclosed Riley drag conveyor, identified as P1-1l, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(13) One (1) totally enclosed Riley drag conveyor, identified as P1-1m, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(14) One (1) totally enclosed pile drag conveyor, identified as P1-1n, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(15) One (1) totally enclosed ground pile drag conveyor, identified as P1-1o, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(16) One (1) totally enclosed ground pile reclaim drag conveyor, constructed in 2019, permitted in 2021, with a capacity of 25,000 bushels per hour (700 tons per hour).

(17) One (1) totally enclosed Reclaim 2 belt conveyor, identified as P1-1p, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(18) One (1) totally enclosed Receiving belt conveyor, identified as P1-1q, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(19) One (1) totally enclosed 7-8-9 East Reclaim drag conveyor, approved in 2016 for construction, identified as P1-1r, with a capacity of 25,000 bushels per hour (700 tons per hour).

(20) One (1) totally enclosed West feed conveyor, identified as P1-1t, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(21) One (1) totally enclosed 401 feed conveyor, identified as P1-1w, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(22) One (1) totally enclosed 4-5-6 side tap drag conveyor, identified as P1-1x, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(23) One (1) totally enclosed West Reclaim drag conveyor, identified as P1-1z, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(24) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977,
with a capacity of 5,000 bushels per hour (140 tons per hour).

(25) One (1) totally enclosed Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1,680 tons per hour).

(26) One (1) totally enclosed Rail Reclaim conveyor, approved in 2016 for construction, identified as P1-1v, with a capacity of 15,000 bushels per hour (420 tons per hour).

(27) One (1) totally enclosed Dryer Feed conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(28) One (1) totally enclosed Dryer Discharge conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(29) One (1) totally enclosed existing 7-8-9 side tap conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1,680 tons per hour).

(30) One (1) totally enclosed 301 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).

(31) One (1) totally enclosed 302 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).

(c) Grain Storage System, identified as F003, constructed before 1977 and modified in 1994, with a total storage capacity of 2.2 million bushels (61,600 tons), controlled by enclosures, and consisting of the following:

(1) Two (2) steel storage bins, identified as Bins 1001 and 1101, constructed before 1977 and modified in 1994, each with a storage capacity of 600,000 bushels (16800 tons).

(2) Three (3) concrete storage silos, identified as Bins 401, 501, and 601, constructed before 1977 and modified in 1994, each with a storage capacity of 91,000 bushels (2548 tons).

(3) Three (3) concrete storage silos, identified as Bins 701, 801, and 901, constructed before 1977 and modified in 1994, each with a storage capacity of 162,000 bushels (4536 tons).

(4) Three (3) concrete storage silos, identified as Bins 101, 301, and 302, constructed before 1977 and modified in 1994, each with a storage capacity of 27,000 bushels (756 tons).

(5) Four (4) concrete storage silos, identified as Bins 202, 203, 204, and 205, constructed before 1977 and modified in 1994, each with a storage capacity of 5,000 bushels (140 tons).

(6) One (1) concrete storage silo, identified as Bin 102A/102B, constructed before 1977 and modified in 1994, with a storage capacity of 25,000 bushels (700 tons).

(7) One (1) concrete storage silo, identified as Bin 201, constructed before 1977 and modified in 1994, with a storage capacity of 7,600 bushels (212.8 tons).

(d) Two (2) temporary open grain storage piles, identified as F004, constructed before
1977, with a total maximum storage capacity of 2,200,000 bushels of grain (61,600 tons).

(e) One (1) Zimmerman grain dryer, identified as F005, approved in 2016 for construction, with a perforated screen plate (column dryer) and a maximum drying capacity of 10,000 bushels of grain per hour (300 tons per hour). The dryer burner burns natural gas and has a maximum heat input capacity of 108 MMBtu per hour.

(f) Grain Loadout operation, with a maximum capacity of 60,000 bushels per hour (1680 tons per hour), constructed before in 1977 and modified in 1994 and 2005, and consisting of the following:

1. One (1) Railcar Loadout site, identified as F006, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.

2. One (1) Truck Loadout site, identified as F007, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.

3. One (1) Rail Loading scale system, identified as P1-1uk, constructed in 1977, modified in 1994 and 2005, and totally enclosed in 2017 to control PM emissions.

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

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

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

(a) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the grain receiving, drying and loadout operations shall not exceed the particulate emission limit in pounds per hour as shown in the table below.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Max. Throughput Rate (tons/hour)</th>
<th>Particulate Emissions Limit (lb/hour)</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Rail Receiving</td>
<td>450</td>
<td>67.7</td>
</tr>
<tr>
<td>Truck Receiving Pits 1 and 2 (Each)</td>
<td>750</td>
<td>73.9</td>
</tr>
<tr>
<td>Truck Receiving Pit 3</td>
<td>450</td>
<td>67.7</td>
</tr>
<tr>
<td>Zimmerman Grain Dryer</td>
<td>300</td>
<td>63.0</td>
</tr>
<tr>
<td>Railcar Loadout (F006)</td>
<td>1740</td>
<td>85.0</td>
</tr>
<tr>
<td>Truck Loadout (F007)</td>
<td>1740</td>
<td>85.0</td>
</tr>
</tbody>
</table>

The pound per hour limitations were calculated using the following equation:

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

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

Where
E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2(e)(3), since the process weight exceeds 200 tons per hour, the above emission units may exceed the emission limit calculated using the equation, as long as the concentration of particulate matter in the gas discharged to the atmosphere remains less than 0.10 pounds per 1,000 pounds of gases.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]
A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regards to the preventive maintenance plan required by this condition.
# 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>Bunge North America (East), LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>4743 County Road 28</td>
</tr>
<tr>
<td>City:</td>
<td>Waterloo, Indiana, Indiana 46793</td>
</tr>
<tr>
<td>Phone #:</td>
<td>260-837-2900</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M 033-43580-00004</td>
</tr>
</tbody>
</table>

I hereby certify that Bunge North America (East), LLC is:
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Bunge North America (East), LLC is:
- ☐ in compliance with the requirements of MSOP M 033-43580-00004.
- ☐ not in compliance with the requirements of MSOP M 033-43580-00004.

**Authorized Individual (typed):**

**Title:**

**Signature:**

**Date:**

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

**Noncompliance:**

<table>
<thead>
<tr>
<th>Noncompliance:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>
**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 VOC?___, 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)?___.

Emissions from malfunctioning control equipment or process equipment caused emissions in excess of applicable limitation ________.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _______________.

THIS INCIDENT MEETS THE DEFINITION OF “MALFUNCTION” AS LISTED ON REVERSE SIDE? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT? Y N

**COMPANY:**_________________________________________________________**PHONE NO.** (  )___________________

**LOCATION:** (CITY AND COUNTY)_________________________________________________________________________

**PERMIT NO.** ________________ **AFS PLANT ID:** ________________ **AFS POINT ID:** ________________ **INSPECTION NO.** ________________

**CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:** ____________________________________________

**DATE/TIME MALFUNCTION STARTED:** _____/_____/20____ AM / PM

**ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:** _______________________________________

**DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE:** _____/_____/20____ AM/PM

**TYPE OF POLLUTANTS EMITTED:** TSP, PM-10, SO2, VOC, OTHER:________________________________________

**ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:** _____________________________________

**MEASURES TAKEN TO MINIMIZE EMISSIONS:** ___________________________________________________________

**REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:**

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:

INTERIM CONTROL MEASURES: (IF APPLICABLE):

________________________________________________________

________________________________________________________

**MALFUNCTION REPORTED BY:**________________________________**TITLE:**___________________________

(SIGNATURE IF FAXED)

**MALFUNCTIONRecorded By:**____________________**DATE:**________________**TIME:**________________

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 “Malfunction” definition

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

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

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

________________________________________________________________________
________________________________________________________________________
Source Description and Location

Source Name: Bunge North America (East), LLC
Source Location: 4743 County Road 28, Waterloo, Indiana 46793
County: DeKalb
SIC Code: 5153 (Grain and Field Beans)
Permit Renewal No.: M 033-43580-00004
Permit Reviewer: Wilfredo de la Rosa

On December 14, 2020, Bunge North America (East), LLC submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Bunge North America (East), LLC relating to the operation of a stationary grain handling facility. Bunge North America (East), LLC was issued its MSOP New Source Construction permit (M 033-36462-00004) on April 12, 2016.

Existing Approvals

The source was issued MSOP NSC No. M 033-36462-00004 on April 12, 2016. The source has since received the following approval:

(a) Administrative Amendment No. 033-37240-00004, issued on June 8, 2016; and
(b) Administrative Amendment No. 033-38742-00004, issued on July 28, 2017.

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

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) Grain receiving operation, identified as F001, with a maximum receiving rate of 16,029,333 bushels of grain per year (51.24 tons per hour), and consisting of the following:

(1) Two (2) truck receiving stations, identified as Pits 1 and 2, approved in 2016 for construction, each with a maximum capacity of 750 tons per hour.

(2) One (1) truck receiving station, identified as Pit 3, constructed before 1977, and permitted in 2016, with a maximum capacity of 450 tons per hour.

(3) One (1) railcar receiving station, with a maximum capacity of 450 tons per hour.

(b) Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:

(1) Two (2) totally enclosed grain elevator legs, identified as P1-1a and P1-1b, approved in 2016 for construction, each with a capacity of 25,000 bushels per hour each (700 tons per hour each).
(2) One (1) totally enclosed grain elevator dry leg, identified as P1-1c, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(3) One (1) totally enclosed grain elevator wet leg, identified as P1-1d, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(4) One (1) totally enclosed rail loadout leg, identified as P1-1e, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).

(5) One (1) totally enclosed Inter Systems Cleaner, identified as P1-1s, constructed before 1977, with a maximum capacity of 40,000 bushels per hour (1120 tons per hour).

(6) One (1) totally enclosed Pit 1 drag conveyor, identified as P1-1f, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(7) One (1) totally enclosed Pit 2 drag conveyor, identified as P1-1g, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(8) One (1) totally enclosed Receiving 1 drag conveyor, identified as P1-1h, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(9) One (1) totally enclosed Receiving 2 drag conveyor, identified as P1-1i, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(10) One (1) totally enclosed East 1 Distribution drag conveyor, identified as P1-1j, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(11) One (1) totally enclosed East 2 Distribution drag conveyor, identified as P1-1k, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(12) One (1) totally enclosed Riley drag conveyor, identified as P1-1l, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(13) One (1) totally enclosed Riley drag conveyor, identified as P1-1m, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(14) One (1) totally enclosed pile drag conveyor, identified as P1-1n, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(15) One (1) totally enclosed ground pile drag conveyor, identified as P1-1o, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(16) One (1) totally enclosed ground pile reclaim drag conveyor, constructed in 2019, permitted in 2021, with a capacity of 25,000 bushels per hour (700 tons per hour).

(17) One (1) totally enclosed Reclaim 2 belt conveyor, identified as P1-1p, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(18) One (1) totally enclosed Receiving belt conveyor, identified as P1-1q, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(19) One (1) totally enclosed 7-8-9 East Reclaim drag conveyor, approved in 2016 for construction, identified as P1-1r, with a capacity of 25,000 bushels per hour (700 tons per hour).

(20) One (1) totally enclosed West feed conveyor, identified as P1-1t, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
(21) One (1) totally enclosed 401 feed conveyor, identified as P1-1w, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

(22) One (1) totally enclosed 4-5-6 side tap drag conveyor, identified as P1-1x, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(23) One (1) totally enclosed West Reclaim drag conveyor, identified as P1-1z, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(24) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).

(25) One (1) totally enclosed Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).

(26) One (1) totally enclosed Rail Reclaim conveyor, approved in 2016 for construction, identified as P1-1v, with a capacity of 15,000 bushels per hour (420 tons per hour).

(27) One (1) totally enclosed Dryer Feed conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(28) One (1) totally enclosed Dryer Discharge conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(29) One (1) totally enclosed existing 7-8-9 side tap conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1,680 tons per hour).

(30) One (1) totally enclosed 301 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).

(31) One (1) totally enclosed 302 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).

(c) Grain Storage System, identified as F003, constructed before 1977 and modified in 1994, with a total storage capacity of 2.2 million bushels (61,600 tons), controlled by enclosures, and consisting of the following:

(1) Two (2) steel storage bins, identified as Bins 1001 and 1101, constructed before 1977 and modified in 1994, each with a storage capacity of 600,000 bushels (16800 tons).

(2) Three (3) concrete storage silos, identified as Bins 401, 501, and 601, constructed before 1977 and modified in 1994, each with a storage capacity of 91,000 bushels (2548 tons).

(3) Three (3) concrete storage silos, identified as Bins 701, 801, and 901, constructed before 1977 and modified in 1994, each with a storage capacity of 162,000 bushels (4536 tons).

(4) Three (3) concrete storage silos, identified as Bins 101, 301, and 302, constructed before 1977 and modified in 1994, each with a storage capacity of 27,000 bushels (756 tons).

(5) Four (4) concrete storage silos, identified as Bins 202, 203, 204, and 205, constructed before 1977 and modified in 1994, each with a storage capacity of 5,000 bushels (140 tons).

(6) One (1) concrete storage silo, identified as Bin 102A/102B, constructed before 1977 and modified in 1994, with a storage capacity of 25,000 bushels (700 tons).
(7) One (1) concrete storage silo, identified as Bin 201, constructed before 1977 and modified in 1994, with a storage capacity of 7,600 bushels (212.8 tons).

(d) Two (2) temporary open grain storage piles, identified as F004, constructed before 1977, with a total maximum storage capacity of 2,200,000 bushels of grain (61,600 tons).

(e) One (1) Zimmerman grain dryer, identified as F005, approved in 2016 for construction, with a perforated screen plate (column dryer) and a maximum drying capacity of 10,000 bushels of grain per hour (300 tons per hour). The dryer burner burns natural gas and has a maximum heat input capacity of 108 MMBtu per hour.

(f) Grain Loadout operation, with a maximum capacity of 60,000 bushels per hour (1680 tons per hour), constructed before in 1977 and modified in 1994 and 2005, and consisting of the following:

(1) One (1) Railcar Loadout site, identified as F006, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.

(2) One (1) Truck Loadout site, identified as F007, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.

(3) One (1) Rail Loading scale system, identified as P1-1uk, constructed in 1977, modified in 1994 and 2005, and totally enclosed in 2017 to control PM emissions.

(g) Unpaved roads and parking lots with public access.

<table>
<thead>
<tr>
<th>Emission Units and Pollution Control Equipment Removed from the Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The source has removed the following emission unit:</td>
</tr>
<tr>
<td>(a) One (1) totally enclosed 401 belt conveyor, identified as P1-1y,</td>
</tr>
<tr>
<td>constructed before 1977, with a capacity of 15,000 bushels per hour</td>
</tr>
<tr>
<td>(420 tons per hour).</td>
</tr>
</tbody>
</table>

The following non-existing units were duplicated in the list of emission units and are therefore removed from the permit:

(a) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).

(b) One (1) totally enclosed existing Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).

<table>
<thead>
<tr>
<th>Emission Units and Pollution Control Equipment Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>As part of this permitting action, the source requested to add the following existing emission unit constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions):</td>
</tr>
<tr>
<td>(a) One (1) totally enclosed ground pile reclaim drag conveyor, constructed in 2019, with a capacity of 25,000 bushels per hour (700 tons per hour).</td>
</tr>
</tbody>
</table>

The total potential to emit of the emission unit(s) is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission unit did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-1.1-3(e), 326 IAC 2-6.1-6, including the requirement to submit an application, do not apply to the emission unit.
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 DeKalb County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO\textsubscript{2}</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O\textsubscript{3}</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM\textsubscript{2.5} standard.</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM\textsubscript{2.5} standard.</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO\textsubscript{2}</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO\textsubscript{2} standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO\textsubscript{x}) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO\textsubscript{x} emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO\textsubscript{x} emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

(c) Other Criteria Pollutants
DeKalb 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 regulated air 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) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
<th>PM1</th>
<th>PM101</th>
<th>PM2.5,2</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>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>80.21</td>
<td>26.00</td>
<td>3.65</td>
<td>0.06</td>
<td>19.74</td>
<td>0.57</td>
<td>8.73</td>
<td>-</td>
<td>-</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>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Source-Wide Fugitives*</td>
<td>96.74</td>
<td>30.42</td>
<td>4.09</td>
<td>0.06</td>
<td>19.74</td>
<td>0.57</td>
<td>8.73</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 10</td>
<td>&lt; 25</td>
</tr>
</tbody>
</table>

1 Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."
2 PM2.5 listed is direct PM2.5.
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 air pollutants is less than 100 tons per year. However, PM and PM10 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.
### 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. Corrections were made in the calculations done in the previous permit. The worst scenario for receiving using straight trucks is now considered. The emission factors for handling were corrected and an enclosure efficiency of 70% was used instead of zero. The operational limitation of the dryer was also corrected. Deleted language are in strikethrough text and the new language are in **bold** text.

<p>| Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited) |</p>
<table>
<thead>
<tr>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹, ²</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><strong>Dryer NG Combustion</strong></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.06</td>
<td>19.34</td>
<td>19.74</td>
<td>0.56</td>
<td>8.54</td>
</tr>
<tr>
<td><strong>Grain Receiving</strong></td>
<td>15.36</td>
<td>4.33</td>
<td>1.14</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Grain Handling</strong></td>
<td>40.97</td>
<td>3.76</td>
<td>0.66</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Rail/Truck Loadout</strong></td>
<td>9.31</td>
<td>1.81</td>
<td>0.31</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Grain Dryer</strong></td>
<td>9.86</td>
<td>2.46</td>
<td>0.42</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitive Emissions</strong></td>
<td>45.46</td>
<td>12.36</td>
<td>2.53</td>
<td>0.06</td>
<td>19.34</td>
<td>19.74</td>
<td>0.56</td>
<td>8.54</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></td>
<td>-</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
</tr>
<tr>
<td><strong>Roadway</strong></td>
<td>16.39</td>
<td>4.37</td>
<td>0.44</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Storage Piles</strong></td>
<td>0.14</td>
<td>0.05</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Source-Wide Fugitives</strong></td>
<td>62.03</td>
<td>16.79</td>
<td>2.96</td>
<td>0.06</td>
<td>19.34</td>
<td>19.74</td>
<td>0.56</td>
<td>8.54</td>
</tr>
<tr>
<td><strong>MSOP Thresholds</strong></td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 10</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a *regulated air pollutant.*
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this renewal. (Note: The table below was generated from the above table with the strikethrough texts deleted and bold texts un-bolded).
Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)  
(Uncontrolled/Unlimited)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂₅₁,₂</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>Dryer NG Combustion</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.06</td>
<td>19.74</td>
<td>0.57</td>
<td>8.73</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Grain Receiving</td>
<td>43.20</td>
<td>14.16</td>
<td>2.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Grain Handling</td>
<td>17.84</td>
<td>7.57</td>
<td>0.52</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rail/Truck Loadout</td>
<td>9.31</td>
<td>1.81</td>
<td>0.31</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Grain Dryer</td>
<td>9.86</td>
<td>2.46</td>
<td>0.42</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>80.21</td>
<td>26.00</td>
<td>3.65</td>
<td>0.06</td>
<td>19.74</td>
<td>0.57</td>
<td>8.73</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>Roadway</td>
<td>16.39</td>
<td>4.37</td>
<td>0.44</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Storage Piles</td>
<td>0.14</td>
<td>0.05</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Source-Wide Fugitives*</td>
<td>96.74</td>
<td>30.42</td>
<td>4.09</td>
<td>0.06</td>
<td>19.74</td>
<td>0.57</td>
<td>8.73</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 10</td>
<td>&lt; 25</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂₅ listed is direct PM₂₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

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

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

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

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

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in the permit for this source, because this grain country elevator has a permanent storage capacity of less than the applicability volume of 2.5 million U.S. bushels.

(b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the Zimmerman grain dryer, because it is not a steam generating unit.
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):

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

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

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 (Prevention of Significant Deterioration (PSD))
PSD 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 potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit 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 2-4.1.

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, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in DeKalb County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in DeKalb County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.
State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-1(b)(14), the Grain Handling and Transfer Operation, identified as F002 and the Rail Loading Scale System are not subject to the requirements of 326 IAC 6-3, since all the units are totally enclosed and emissions from each individual unit are less than 0.551 pound per hour.

(b) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Receiving, Dryer and Loadout facilities, since they are manufacturing processes not exempted from this rule under 326 IAC 6-3-1(b) and are not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the emission units listed in the table below shall not exceed the pounds per hour (E) when operating at the corresponding process weight rate in tons per hour (P). The pound per hour limitation was calculated with the following equation:

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

where \( E = \) rate of emission in pounds per hour; and \( P = \) process weight rate in tons per hour

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>PTE (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain Dryer</td>
<td>300</td>
<td>63.0</td>
<td>2.25</td>
</tr>
<tr>
<td>Rail Receiving</td>
<td>450</td>
<td>67.7</td>
<td>9.86</td>
</tr>
<tr>
<td>Truck Receiving, Pit 1</td>
<td>750</td>
<td>73.9</td>
<td>9.86</td>
</tr>
<tr>
<td>Truck Receiving, Pit 2</td>
<td>750</td>
<td>73.9</td>
<td>9.86</td>
</tr>
<tr>
<td>Truck Receiving Pit 3</td>
<td>450</td>
<td>67.7</td>
<td>9.86</td>
</tr>
<tr>
<td>Railcar Loadout</td>
<td>1740</td>
<td>85.0</td>
<td>1.18</td>
</tr>
<tr>
<td>Truck Loadout</td>
<td>1740</td>
<td>85.0</td>
<td>0.94</td>
</tr>
</tbody>
</table>

Based on calculations, the control equipment is not needed to comply with these limits.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The Zimmerman grain dryer, identified as F005, 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, the Zimmerman grain dryer, identified as F005, 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.

Compliance Determination and Monitoring Requirements

There are no compliance requirements applicable to this source.
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 conditions contained previously issued permits/approvals (these changes may include Title I changes):

Change 1: Section A.2 has been amended to incorporate the changes (removal of non-existent unit and entry duplication, addition of exempt unit, and description amendment) in the list of emission units as requested by the source:

A.2 Emission Units and Pollution Control Equipment Summary

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

(b) Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:

(15) One (1) totally enclosed ground pile drag conveyor, identified as P1-1o, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(16) One (1) totally enclosed ground pile reclaim drag conveyor, constructed in 2019, permitted in 2021, with a capacity of 25,000 bushels per hour (700 tons per hour).

(167) One (1) totally enclosed Reclaim 2 belt conveyor, identified as P1-1p, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(212) One (1) totally enclosed 4-5-6 side tap drag conveyor, identified as P1-1x, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).

(22) One (1) totally enclosed 401 belt conveyor, identified as P1-1y, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(23) One (1) totally enclosed West Reclaim drag conveyor, identified as P1-1z, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

(24) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).

(25) One (1) totally enclosed Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).

(26) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).

(27) One (1) totally enclosed existing Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
One (1) totally enclosed Rail Reclaim conveyor, approved in 2016 for construction, identified as P1-1v, with a capacity of 15,000 bushels per hour (420 tons per hour).

**Change 2:** Section D.1 has been amended to incorporate the changes in the emission units and in the applicable rule.

### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>(b)</strong> Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:</td>
</tr>
<tr>
<td>15</td>
</tr>
<tr>
<td>16</td>
</tr>
<tr>
<td>167</td>
</tr>
<tr>
<td>201</td>
</tr>
<tr>
<td>242</td>
</tr>
<tr>
<td>22</td>
</tr>
<tr>
<td>23</td>
</tr>
<tr>
<td>24</td>
</tr>
<tr>
<td>25</td>
</tr>
<tr>
<td>26</td>
</tr>
<tr>
<td>27</td>
</tr>
<tr>
<td>286</td>
</tr>
</tbody>
</table>
D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the grain receiving, drying and loadout operations shall not exceed the particulate emission limit in pounds per hour as shown in the table below.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Max. Throughput Rate (tons/hour)</th>
<th>Particulate Emissions Limit (lb/hour)</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Rail Receiving</td>
<td>450</td>
<td>67.7</td>
</tr>
<tr>
<td>Truck Receiving Pits 1 and 2 (Each)</td>
<td>750</td>
<td>73.9</td>
</tr>
<tr>
<td>Truck Receiving Pit 3</td>
<td>450</td>
<td>67.7</td>
</tr>
<tr>
<td>Zimmerman Grain Dryer</td>
<td>300</td>
<td>63.0</td>
</tr>
<tr>
<td>Railcar Loadout (F006)</td>
<td>1740</td>
<td>85.0</td>
</tr>
<tr>
<td>Truck Loadout (F007)</td>
<td>1740</td>
<td>85.0</td>
</tr>
<tr>
<td>Grain Handling and Transfer Operation</td>
<td>112.51</td>
<td>52.47</td>
</tr>
</tbody>
</table>

The pound per hour limitations were calculated using the following equation:

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

Where

\[ E = \text{rate of emission in pounds per hour}; \text{ and} \]
\[ P = \text{process weight rate in tons per hour} \]

(b) Pursuant to 326 IAC 6-3-2(e)(3), since the process weight exceeds 200 tons per hour, the above emission units may exceed the emission limit calculated using the equation, as long as the concentration of particulate matter in the gas discharged to the atmosphere remains less than 0.10 pounds per 1,000 pounds of gases.

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 December 14, 2020. Additional information was received on December 31, 2020.

The operation of this stationary shall be subject to the conditions of the attached proposed MSOP Renewal No. 033-43580-00004.

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

(a) If you have any questions regarding this permit, please contact Wilfredo de la Rosa, 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) 232-8422 or (800) 451-6027, and ask for Wilfredo de la Rosa or (317) 232-8422.

(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.
Appendix A: Emission Calculations

Potential to Emit Summary

Company Name: Bunge North America (East), LLC
Address: 4743 County Road 28, Waterloo, Indiana 46793
Operating Permit No.: M 033-43580-00004
Reviewer: Wilfredo de la Rosa

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO$_2$</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain Dryer - NG Combustion</td>
<td>**</td>
<td>**</td>
<td>**</td>
<td>0.06</td>
<td>19.74</td>
<td>0.57</td>
<td>8.73</td>
</tr>
<tr>
<td>Grain Receiving</td>
<td>43.20</td>
<td>14.16</td>
<td>2.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Handling/Internal Operations</td>
<td>17.84</td>
<td>7.57</td>
<td>0.52</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rail Truck Loadout</td>
<td>9.31</td>
<td>1.81</td>
<td>0.31</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Grain Dryer</td>
<td>9.86</td>
<td>2.46</td>
<td>0.42</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Fugitive Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roadway</td>
<td>16.39</td>
<td>4.37</td>
<td>0.44</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Grain Storage Piles</td>
<td>0.14</td>
<td>0.05</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>96.74</td>
<td>30.42</td>
<td>4.09</td>
<td>0.06</td>
<td>19.74</td>
<td>0.57</td>
<td>8.73</td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations
Particulate Emissions
From Grain Storage Piles (Fugitive)

Company Name: Bunge North America (East), LLC
Address: 4743 County Road 28, Waterloo, Indiana 46793
Operating Permit No.: M 033-43580-00004
Reviewer: Wilfredo de la Rosa

1. Emission Factors:

According to AP-42, Chapter 13.2.4 - Aggregate Handling and Storage Piles, the PM/PM10/PM2.5 emission factors for storage piles can be estimated from the following equation:

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

where:

- \( Ef \) = Emission Factor (lbs/ton)
- \( k \) = Particle size multiplier = 1 for PM, 0.35 for PM10, and 0.053 for PM2.5
- \( U \) = Mean wind speed (mph) = 12 mph
- \( M \) = Moisture content (%) = 15.0 %

Therefore,

- PM Emission Factor = 0.0006 lbs/ton process
- PM10 Emission Factor = 0.0002 lbs/ton process
- PM2.5 Emission Factor = 0.00003 lbs/ton process

2. Uncontrolled PTE of PM/PM10 emissions from storage piles:

Max. Throughput Rate (worst case basis) = 480,000 (tons/year)

- PTE of PM (tons/year) = 435,000 tons/year * 0.0006 lbs/ton * 1 ton/2000 lbs = 0.143
- PTE of PM10 (tons/year) = 435,000 tons/year * 0.0002 lbs/ton * 1 ton/2000 lbs = 0.050
- PTE of PM2.5 (tons/year) = 435,000 tons/year * 0.00003 lbs/ton * 1 ton/2000 lbs = 0.008
## Appendix A: Emission Calculations
### Fugitive Dust Emissions - Unpaved Roads

**Company Name:** Bunge North America (East), LLC  
**Address:** 4743 County Road 28, Waterloo, Indiana 46793  
**Operating Permit No.:** M 033-43580-00004  
**Reviewer:** Wilfredo de la Rosa  

### Unpaved Roads at Industrial Site

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

### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incoming Trucks (Empty)</td>
<td>1.0</td>
<td>1137</td>
<td>12.0</td>
<td>13682.0</td>
<td>3.82</td>
<td>0.001</td>
<td>7.8</td>
</tr>
<tr>
<td>Outgoing Trucks (Empty)</td>
<td>1.0</td>
<td>1812</td>
<td>18.0</td>
<td>24882.0</td>
<td>3.82</td>
<td>0.001</td>
<td>12.2</td>
</tr>
<tr>
<td>Cars</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Unmitigated Emission Factor, $E_f$ = \( k \times (s/12)^a \times (W/3)^b \)  

where:
- \( k = 4.9 \) (lb/mi) = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( s = 6.0 \) (6.0\%) = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 for Iron and Steel Production)
- \( a = 0.7 \)  
- \( a = 0.9 \)  
- \( b = 0.45 \)  
- \( W = 23.1 \) (tons) = average vehicle weight (provided by source)  
- \( b = 0.45 \) = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext}$ = $E_f \times \left( \frac{365 - P}{365} \right)$  

where \( P = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1).

### Dust Control Efficiency

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incoming Trucks (Empty)</td>
<td>10.75</td>
<td>2.86</td>
<td>0.29</td>
<td>1.68</td>
<td>0.19</td>
<td>3.53</td>
<td>0.94</td>
<td>0.09</td>
<td></td>
</tr>
<tr>
<td>Outgoing Trucks (Empty)</td>
<td>1.71</td>
<td>0.49</td>
<td>0.05</td>
<td>1.13</td>
<td>0.03</td>
<td>3.56</td>
<td>0.15</td>
<td>0.02</td>
<td></td>
</tr>
<tr>
<td>Cars</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td>24.93</td>
<td>6.64</td>
<td>0.66</td>
<td>16.39</td>
<td>4.37</td>
<td>8.19</td>
<td>2.18</td>
<td>0.22</td>
<td></td>
</tr>
</tbody>
</table>

### Methodology

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]  
- Maximum one-way miles (miles/day) = [Maximum one-way distance (feet/trip)] / 5280 ft/mi  
- Average Vehicle Weight Per Trip (ton/trip) = \( \sum\text{Total Weight driven per day (ton/day)} / \sum \text{Maximum trips per day (trip/day)} \)  
- Average Miles Per Trip (miles/trip) = \( \sum\text{Maximum one-way miles (miles/day)} / \sum \text{Maximum trips per year (trip/day)} \)  
- Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/year)] * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)  
- Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

**Abbreviations**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
Appendix A: Emission Calculations
Particulate Emissions
From Grain Receiving

Company Name: Bunge North America (East), LLC
Address: 4743 County Road 28, Waterloo, Indiana 46793
Operating Permit No.: M 033-43580-00004
Reviewer: Wilfredo de la Rosa

Based off Worst case between truck and rail.

<table>
<thead>
<tr>
<th>Unit</th>
<th>Annual Throughput Rate (tons/year)</th>
<th>% of Annual Throughput Rate</th>
<th>Emission Factor for PM (lbs/ton)</th>
<th>PTE of PM (tons/year)</th>
<th>Emission Factor for PM10 (lbs/ton)</th>
<th>PTE of PM10 (tons/year)</th>
<th>Emission Factor for PM2.5 (lbs/ton)</th>
<th>PTE of PM2.5 (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck (F001)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>hopper bottom trucks</td>
<td>384,000</td>
<td>80%</td>
<td>0.035</td>
<td>6.7</td>
<td>0.0078</td>
<td>1.50</td>
<td>0.0013</td>
<td>0.2496</td>
</tr>
<tr>
<td>straight trucks</td>
<td>96,000</td>
<td>20%</td>
<td>0.18</td>
<td>8.6</td>
<td>0.059</td>
<td>2.83</td>
<td>0.010</td>
<td>0.48</td>
</tr>
<tr>
<td></td>
<td>Truck Total</td>
<td></td>
<td>15.4</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>4.33</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truck (F001)</td>
<td>480,000</td>
<td>100%</td>
<td>0.18</td>
<td>43.2</td>
<td>0.059</td>
<td>14.16</td>
<td>0.010</td>
<td>2.4</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rail Car (F001)</td>
<td>480,000</td>
<td>100%</td>
<td>0.032</td>
<td>7.68E+00</td>
<td>0.0078</td>
<td>1.87E+00</td>
<td>0.0013</td>
<td>0.312</td>
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<tr>
<td></td>
<td>Total</td>
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<td>43.20</td>
<td></td>
<td></td>
<td>14.16</td>
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<td>2.40</td>
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</table>

1. Emission factors are from AP-42, Table 9.9.1-1 Grain Elevators - Grain Receiving, SCC 3-02-005-05 (03/03).
2. The source receives grain by trucks with 80% being hopper bottom trucks and 20% straight trucks according to the source.

*Pursuant to AP42 Chapter 9.9.1 Grain Elevators and Processes, page 9.9.1-19 example 2, if a source receives grain by both straight and hopper bottom trucks, the emission factor should represent a conservative percentage of the distribution of straight and hopper bottom trucks normally handled at the facility. This source has given a conservative percentage of 80% by hopper bottom trucks and 20% by straight trucks. However, in this renewal, M 033-43580-0004, the worst scenario where 100% are received in straight trucks is considered in the PTE calculation.

METHODOLOGY
Rail Car (F001) PTE (tons/year) = Max. throughput rate (tons/year) * Emission factor (lbs/ton) * 1ton/2000 lbs
Truck (F001) PTE (tons/year) = Max. throughput rate (tons/year) * % of Annual Throughput Rate * Emission Factor (lbs/ton) * 1ton/2000 lbs
### Appendix A: Emission Calculations

**PM and PM10 Emissions**

From the Existing Grain Elevator

**Company Name:** Bunge North America (East), LLC  
**Address:** 4743 County Road 28, Waterloo, Indiana 46793  
**Operating Permit No.:** M 033-43580-00004  
**Reviewer:** Wilfredo de la Rosa

#### Potential to Emit PM/PM10/PM2.5

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Unit Description</th>
<th>Annual Throughput (tons/yr)*</th>
<th>Uncontrolled PM Emission Factor (lbs/ton)**</th>
<th>Uncontrolled PM10 Emission Factor (lbs/ton)**</th>
<th>Uncontrolled PM2.5 Emission Factor (lbs/ton)**</th>
<th>Control Method</th>
<th>Enclosure Efficiency*** (%)</th>
<th>PTE of PM before Enclosure (tons/yr)</th>
<th>PTE of PM10 before Enclosure (tons/yr)</th>
<th>PTE of PM2.5 before Enclosure (tons/yr)</th>
<th>PTE of PM with Enclosure (tons/yr)</th>
<th>PTE of PM10 with Enclosure (tons/yr)</th>
<th>PTE of PM2.5 with Enclosure (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>F002</td>
<td>Grain Transfer/Convey</td>
<td>1,097,600</td>
<td>0.0610</td>
<td>0.0340</td>
<td>0.0058</td>
<td>internal design</td>
<td>70.0%</td>
<td>33.48</td>
<td>18.66</td>
<td>3.18</td>
<td>10.04</td>
<td>5.60</td>
<td>0.18</td>
</tr>
<tr>
<td>F003</td>
<td>Grain Cleaner</td>
<td>48,000</td>
<td>0.075</td>
<td>0.0190</td>
<td>0.0032</td>
<td>bin vents</td>
<td>0.0%</td>
<td>1.80</td>
<td>0.46</td>
<td>0.08</td>
<td>1.80</td>
<td>0.46</td>
<td>0.08</td>
</tr>
<tr>
<td>F003</td>
<td>Grain Storage Bin Vents</td>
<td>480,000</td>
<td>0.025</td>
<td>0.0063</td>
<td>0.0011</td>
<td>bin vents</td>
<td>0.0%</td>
<td>6.00</td>
<td>1.51</td>
<td>0.26</td>
<td>6.00</td>
<td>1.51</td>
<td>0.26</td>
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<td><strong>Total</strong></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>41.28</td>
<td>20.63</td>
<td>3.52</td>
<td>17.84</td>
<td>7.57</td>
<td>0.52</td>
</tr>
</tbody>
</table>

**Note:** Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (04/03).

*Handling/Internal Operations=480,000 (receiving)+480,000(shipping)+48,000(cleaning)+89,600(drying)=1,097,600 tons/year.*

**The uncontrolled emission factors are corrected from 0.00601 to 0.0610 for PM, 0.0034 to 0.034 for PM10 and 0.00058 to 0.0058 for PM2.5 for handling.**

***All conveyors and other units used in the internal handling are enclosed. According to the Air Pollution Engineering Manual (Buonicore and Davis, 1992), enclosure of material transfer points can result in particulate emissions reduction of 70% as a conservative estimate.***

*PTE of PM/PM10/PM2.5 before Control (tons/yr) = Throughput Rate (tons/yr) x Uncontrolled Emission Factor (lbs/ton) x 1 ton/2000lbs*

*PTE of PM/PM10/PM2.5 after Control (tons/yr) = PTE of PM/PM10/PM2.5 before Control (tons/yr) x (1-Control Efficiency)
**Appendix A: Emission Calculations**

**Particulate Emissions**

Zimmerman Grain Dryer

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Bunge North America (East), LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>4743 County Road 28, Waterloo, Indiana 46793</td>
</tr>
<tr>
<td>Operating Permit No.:</td>
<td>M 033-43580-00004</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Wilfredo de la Rosa</td>
</tr>
</tbody>
</table>

Note that only corn is used in the grain dryer. Also, there is a bottleneck to the process in that the amount of grain that the facility can receive.

<table>
<thead>
<tr>
<th>Unit</th>
<th>Annual Throughput Rate (tons/year)</th>
<th>Emission Factor for PM (lbs/ton)</th>
<th>PTE of PM (tons/year)</th>
<th>Emission Factor for PM10 (lbs/ton)</th>
<th>PTE of PM10 (tons/year)</th>
<th>Emission Factor for PM2.5 (lbs/ton)</th>
<th>PTE of PM2.5 (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain Dryer (F005)</td>
<td>89,800</td>
<td>0.22</td>
<td>9.86</td>
<td>0.055</td>
<td>2.46</td>
<td>0.0094</td>
<td>0.42</td>
</tr>
</tbody>
</table>

1. Emission factors are from AP-42, Table 9.9.1-1 Grain Elevators - Grain Drying (Column Dryer), SCC 3-02-005-27 (03/03).
2. Assume that the Permittee dries 100% of all grain to derive worst case emissions.

**METHODOLOGY**

PTE (tons/year) = Max. throughput rate (tons/year) * Emission factor (lbs/ton) * 1 ton/2000 lbs

Annual Throughput Calculation (tons/year)

The dryer has a maximum capacity of 3,200,000 bushels per year

1 bushel of corn = 56 pounds
3,200,000 bushels per year * 56 pounds/1 bushel = 179,200,000 pounds per year

179,200,000 pounds per year * 1 ton/2000 pounds = 89,600 tons per year
Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr > 100)
From the One (1) Zimmerman Grain Dryer (GD)

Company Name: Bunge North America (East), LLC
Address: 4743 County Road 28, Waterloo, Indiana 46793
Operating Permit No.: M 033-43580-00004
Reviewer: Wilfredo de la Rosa

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM</th>
<th>PM10</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lbs/MMSCF</td>
<td>1.9</td>
<td>7.6</td>
<td>0.6</td>
<td>190</td>
<td>5.5</td>
<td>84.0</td>
</tr>
<tr>
<td>Unlimited Potential to Emit in tons/yr</td>
<td>**</td>
<td>**</td>
<td>0.06</td>
<td>19.7</td>
<td>0.57</td>
<td>8.7</td>
</tr>
</tbody>
</table>

1 Pursuant to the EPA Memorandum published on November 14, 1995 "Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities" the potential to emit shall take in to account inherent operational limitations. (# hrs dryer = 89600 tons*8760 hrs/400,000 tons=1962 hrs)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu
MMSCF = 1,000,000 Standard Cubic Feet of Gas

Potential Throughput (MMSCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Unlimited Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2000 lbs
### Appendix A: Emission Calculations

**Particulate Emissions From Rail Truck Loadout**

**Company Name:** Bunge North America (East), LLC  
**Address:** 4743 County Road 28, Waterloo, Indiana 46793  
**Operating Permit No.:** M 033-43580-00004  
**Reviewer:** Wilfredo de la Rosa

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Control Device</th>
<th>Annual Throughput Rate (tons/year)</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM10 Emission Factor (lb/ton)</th>
<th>PM2.5 Emission Factor (lb/ton)</th>
<th>Control Efficiency</th>
<th>Uncontrolled PM (ton/yr)</th>
<th>Uncontrolled PM10 (ton/yr)</th>
<th>Uncontrolled PM2.5 (ton/yr)</th>
<th>Controlled PM (ton/yr)</th>
<th>Controlled PM10 (ton/yr)</th>
<th>Controlled PM2.5 (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rail Loading (F006)</td>
<td>Baghouse</td>
<td>384,000</td>
<td>0.027</td>
<td>0.0022</td>
<td>0.00037</td>
<td>80%</td>
<td>5.18</td>
<td>0.42</td>
<td>0.07104</td>
<td>1.04</td>
<td>0.08448</td>
<td>0.14208</td>
</tr>
<tr>
<td>Truck Loading (F007)</td>
<td>Baghouse</td>
<td>96,000</td>
<td>0.086</td>
<td>0.029</td>
<td>0.0049</td>
<td>80%</td>
<td>4.13</td>
<td>1.39</td>
<td>0.2352</td>
<td>0.826</td>
<td>0.2784</td>
<td>0.04704</td>
</tr>
<tr>
<td><strong>Total</strong></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>9.31</strong></td>
<td><strong>1.81</strong></td>
<td><strong>0.31</strong></td>
<td><strong>1.86</strong></td>
<td><strong>0.36</strong></td>
<td><strong>0.36</strong></td>
</tr>
</tbody>
</table>

Emission Factors are from AP 42 Table 9.9.1-1 Grain Elevators - Grain Shipping SCC 3-02-005-63, SCC 3-02-005-60 (03/03)

Majority of the grain shipping takes place by rail car

**Methodology**

Uncontrolled PM (ton/yr) = Annual Throughput Rate (tons/yr) * PM Emission Factor (lb/ton) / 2000 lbs  
Uncontrolled PM10 (ton/yr) = Annual Throughput Rate (tons/yr) * PM10 Emission Factor (lb/ton) / 2000 lbs  
Uncontrolled PM2.5 (ton/yr) = Annual Throughput Rate (tons/yr) * PM2.5 Emission Factor (lb/ton) / 2000 lbs  
Controlled PM (ton/yr) = Uncontrolled PM (ton/yr) * (1 - Control Efficiency %)  
Controlled PM10 (ton/yr) = Uncontrolled PM10 (ton/yr) * (1 - Control Efficiency %)  
Controlled PM2.5 (ton/yr) = Uncontrolled PM2.5 (ton/yr) * (1 - Control Efficiency %)
January 27, 2021

Duane Melcher  
Bunge North America (East), LLC  
4743 CR 28  
Waterloo, IN 46793-0697

Re: Public Notice  
Bunge North America (East), LLC  
Permit Level: MSOP Renewal  
Permit Number: 033-43580-00004

Dear Mr. Melcher:

Enclosed is a copy of the preliminary findings for your draft air permit, including the draft permit, Technical Support Document, emission calculations, and the Notice of 30-Day Period for Public Comment.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment (without supporting documents) has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

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 Waterloo – Grant Township Public Library, 300 South Wayne Street in Waterloo, IN. 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 Wilfredo de la Rosa, 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 2-8422 or dial (317) 232-8422.

Sincerely,

Theresa Weaver

Theresa Weaver  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 8/10/2020
January 27, 2021

To: Waterloo – Grant Township 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: Bunge North America (East), LLC
Permit Number: 033-43580-00004

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

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

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

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

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

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 27, 2021
Bunge North America (East), LLC
033-43580-00004

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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 2/28/2020
Mail Code 61-53

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<td>Mike Tate  Director Bunge North America (East), LLC 1391 Timberlake Manor Pkwy Chesterfield MO 63017 (RO CAATS)</td>
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<td></td>
<td>Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)</td>
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<td></td>
<td>DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)</td>
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<td>Ms. Diane Leroy  303 N. Jackson St. Auburn IN 46706 (Affected Party)</td>
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<td>Mr. Barry Fordanish  R#3 1480 CR 66 Auburn IN 46706 (Affected Party)</td>
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<td>DeKalb County Health Department 220 E 7th St, Ste 110 Auburn IN 46706 (Health Department)</td>
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<td>Daniel &amp; Sandy Trimmer  15021 Yellow River Road Columbia City IN 46725 (Affected Party)</td>
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<td>Brown &amp; Sons Fuel Co.  P.O. Box 665 Kendallville IN 46755 (Affected Party)</td>
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<td>Waterloo Town Council 280 S. Wayne St, P.O. Box 96 Waterloo IN 46793 (Local Official)</td>
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<td>Waterloo-Grant Township Public Library 300 S Wayne St, PO Box 707 Waterloo IN 46793-4491 (Library)</td>
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<td>Mr. Marty K. McCurdy  2550 County Road 27 Waterloo IN 46793 (Affected Party)</td>
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<td>Nucor Building Products 305 Industrial Parkway Waterloo IN 46793 (Affected Party)</td>
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<td>DeKalb County Building Department 301 S Union St Auburn IN 46706 (Local Official)</td>
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<td>Lisa Green  The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
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