



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 3, 2024

VIA ELECTRONIC MAIL

Mr. Luther Hanes
Consolidated Grain and Barge
2781 Bluff Road
Mt. Vernon, IN 47620
Luther.hanes@cgb.com

Re: Inspection Summary Letter
Consolidated Grain and Barge
Source ID 129-00035
Mt. Vernon, Posey County

Dear Mr. Luther Hanes:

On June 26, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Consolidated Grain and Barge, located at 2781 Bluff Road in Mt. Vernon, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: No violations were observed

Please direct any questions to me at 812-582-0614 or by email at droos@idem.in.gov.

Sincerely,

Daniel Roos, Compliance Inspector
Southwest Regional Office
Office of Air Quality

ACES ID: 298799

cc: Daniel Roos, Compliance and Enforcement Branch, Office of Air Quality

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
SOURCE NAME	Consolidated Grain and Barge
SOURCE LOCATION	2781 Bluff Road, Mt. Vernon, Indiana Posey County
MAILING ADDRESS	2781 Bluff Road, Mt. Vernon, IN 47620
PLANT ID	129-00035
<u>PERMIT INFORMATION</u>	Permit Type: TVOP Permit Number: 129-45244-00035 Permit Expiration Date: 12/2/2022 VFC Document No.(hyperlink): 83468412
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input checked="" type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The source is a soybean oil extraction plant.

INSPECTION INFORMATION			
INSPECTED BY	Daniel Roos		
INSPECTION DATE AND TIME	June 26, 2024	TIME IN: 9:40 AM	TIME OUT: 11:40 AM
REPORTED BY	Daniel Roos	REPORT DATE: 7/2/2024 <i>DAR</i>	
<u>COMPLIANCE PERIOD REVIEWED</u>	January 2022 to June 2024		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Other:		<input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Complaint <input type="checkbox"/> Surveillance
ACES TRACKING NUMBER(S)	Inspection: 298799	Complaint:	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	The source operates under a TV Renewal issued December 2, 2022. The source was last inspected on December 1, 2021, where no violations were observed. IDEM OAQ has not received any recent complaints for the source.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Luther Hanes	Compliance Coordinator	812-228-6294	Luther.hanes@cgb.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
12/1/2021	CMS	No Violations Noted	
9/18/2018	CMS	Violations Noted	See 9/18/2018 VL.

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
9/18/2018	Violation Letter	Violations of differential pressure readings outside permitted limits and Initial notification of startup for Boiler P 18 B not being submitted.	
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
2022-28621-A	Formal Enforcement	\$ 6,250	Late Testing Baghouse C9, Unit P9
Other Relevant Actions			
Action Taken	Comments		
N/A			

PERMIT SECTION D.1			
Emission Units and Control Devices:			
<ul style="list-style-type: none"> Four Natural Gas Fired Boilers 			
Pollutants with Emission Limits or Applicable Standards:			
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS			
Applicable Rules:			
<ul style="list-style-type: none"> 326 IAC 6-2-4 			
Requirement:	Applicable	Violation Noted	
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Recordkeeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Types of Records Reviewed:			
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Observations and Comments:			
I observed the equipment in operation during the inspection.			
D.1.2 – I observed the preventive maintenance plan and deemed it adequate.			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
N/A			
Permit Section Compliance Status:			

PERMIT SECTION D.1

No violations were observed or determined for this permit section at the time of the inspection.
 The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.2

Emission Units and Control Devices:

- One Soybean Oil Extraction Plant
- One Grain Terminal Plant

Pollutants with Emission Limits or Applicable Standards:

SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rules:

- 326 IAC 2-2, 40 CFR 64

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Monthly Throughputs, Daily VE, Daily Pressure Drop, Testing Records, Guage Calibration Records		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Observations and Comments:

I observed the equipment in operation during the inspection except for the North Truck Receiving pit. Mr. Hanes stated the North Truck receiving pit is rarely used.

D.1.1 – The following annual throughputs were reported in their 2024 1st Quarterly Report ending March 2024.

Unit	Reported Throughput/12 consecutive months (Tons)	Permitted Limit (Tons)
Grain Receiving: Grain Terminal & Soybean Oil Plant (P1AT, P1BT, P1DT, P1CT, P1, P2)	1,462,295.89	2,000,000 Combined
Grian Receiving: Grain Terminals (P24, P2T, P7T)	P24: 42,969.87 P2T: 0 P7T: 30,944.72	P24: 150,000 P2T: 10,000 P7T: 60,000
Handling/Internal Operations (Various)	1,954,019.13	3,000,000
Drying (P4T & P4AT)	2,004.27	160,000
Shipping/Loadout (P5T)	7,823.49	450,000
Shipping/Loadout (P6AT & P6BT)	0	60,000
Shipping/Loadout (P9AT & P9BT)	26,937.59	60,000

D.2.2 – I observed the preventive maintenance plan and deemed it adequate.

D.2.3 – I observed the control equipment in operation during the inspection.

D.2.4 – I observed the stack test records and deemed them complete. The records are the following:

Unit (Stack)	Most Recent Testing Date (PM, PM10, PM2.5)	Testing Requirement
P1AT, P1BT, P1DT Stack S1	7/21/2020	5 Years
P1CT Stack S3	7/22/2020	5 Years

PERMIT SECTION D.2

P1, P2 Stack 1	7/22/2020	5 Years
P24 Stack 24	10/16/2020	5 Years

D.2.5, 2.8 – I observed the daily visible emission notation records from January 2022 to present and deemed them complete.

D.2.6, 2.8 – I observed the daily pressure drop reading records from January 2022 to present and deemed them complete. The source has started using a computer database to record the pressure drop readings in real time. Mr. Hanes stated in the future they plan on recording all the readings electronically. I observed the calibration records from January 2022 to present and deemed them complete. The most recent gauge calibration for all the control equipment gauges was completed on April 12, 2024. These were completed in a timely manner. Gauge calibration is required every 6 months.

D.2.9 – The quarterly reports have been submitted in a timely manner.

Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
Baghouse C34	Pressure Drop Reading in H2O	1-7 in H2O	0 in H2O
Baghouse C1	Pressure Drop Reading in H2O	1-7 in H2O	1.2 in H2O

Permit Section Compliance Status:

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.3

Emission Units and Control Devices:

- Oil Extraction Process: (Soybean Expander, Soybean Cleaning, Soybean Heaters, Hot Dehulling Operation, Soybean Flaking, Soybean Oil Extraction, Four Metal Dryers, Metal Cooling, Enclosed Drag Conveyor, Five Fixed Roof Hexane Storage Tanks)

Pollutants with Emission Limits or Applicable Standards:

- SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rules:

- 326 IAC 2-2, 6-3-2, 8-1-6

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Throughput Records, Downtime Records, Daily VEs, Daily Pressure Drop, Solvent loss Ratio Records, Testing Records, Inlet Vacuum pressure records, and mineral oil temperature records		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Observations and Comments:

I observed the equipment in operation during the inspection.

D.3.1 – The source reported in their 2024 1st Quarterly Report 1,530,350 tons of soybeans were processed in the twelve-month period ending March 2024. This is below the 1,533,000-ton limit. The source also reported 68.71 hours of downtime for Baghouse C5 and 24.53 hours of downtime for Baghouse C5E in the twelve-month period ending

PERMIT SECTION D.3

March 2024. This is below the limit of 480 hours of downtime. I observed the baghouse downtime records from January 2022 to present and deemed them complete.

D.3.3,3.6 – The source reported in their 2024 1st Quarterly Report the ratio of gallons of solvent per tons of soybeans processed was 0.099-gallon solvent loss/tons of soybeans processed in the twelve-month period ending March 2024. This is below the limit of 0.16 gallons solvent loss/ ton of soybeans. I observed the loss ratio records from January 2022 to present and deemed them complete. The soybean extraction and distillation process are controlled by a mineral oil absorber system.

D.3.4 – I observed the preventive maintenance plan and deemed it adequate.

D.3.5, 3.6 – I observed the control equipment in operation during the inspection.

D.3.7 – I observed the stack test records and deemed them complete. The records are the following:

Unit (Stack)	Most Recent Testing Date	Testing Requirement
Cyclone C4A	2/16/2022 PM, PM10, PM2.5	5 Years
East Soybean Heater Cyclone (C21A) One of the four Jet Dryers and the STDC Metal Dryers and Cooler (Stack 10)	7/13/2023 PM, PM10, PM2.5	5 Years
Soybean Cracking and Dehulling (P5)	7/13/2023 PM, PM10, PM2.5	5 Years
Soybean Flaking Operation P19 (Stacks 19 and/or P19D)	7/23/2020 PM, PM10, PM2.5	5 Years
Soybean Oil Extraction System P13	7/13/2023 VOC	5 Years
DTDC Dryers and Cooler	7/13/2023 VOC	5 Years

D.3.8, 3.14 – I observed the daily visible emission notation records from January 2022 to present and deemed them complete.

D.3.9,3.14 – I observed the daily pressure drop reading records from January 2022 to present and deemed them complete. The source has started using a computer database to record the pressure drop readings in real time. Mr. Hanes stated in the future they plan on recording all the readings electronically. I observed the calibration records from January 2022 to present and deemed them complete. The most recent gauge calibration for all the control equipment gauges was completed on April 12, 2024. These were completed in a timely manner. Guage calibration is required every 6 months.

D.3.12, 3.14 – I observed the electronic data management system instantaneous inlet vacuum pressure and flow rate records and the mineral oil inlet temperature records from January 2022 to present and deemed them complete.

D.3.13,3.14 – I observed the daily visible emission notation records from January 2022 to present and deemed them complete.

D.3.15 – The source submits their quarterly reports in a timely manner.

<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
Mineral Oil Absorber System	Inlet Vacuum Pressure	Cannot Exceed 10 in H2O	-5.41 in H2O
Mineral Oil Absorber System	Temperature Entering Absorber	Kept Below 105 degrees F	94.89 degrees F
Mineral Oil Absorber System	Flow Rate	Must be above 15 gal/min	67.55 gal/min
Mineral Oil Absorber System	Temperature of Oil Entering Stripping Column	Must be above 200 degrees F	245 degrees F
Soybean Cleaning Operation P4	Pressure Drop	1-9 in H2O	4.0 in H2O
Soybean Flaking Operation P19	Pressure Drop	1-12 in H2O	2.6 in H2O

Permit Section Compliance Status:

PERMIT SECTION D.3

No violations were observed or determined for this permit section at the time of the inspection.
 The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.4

Emission Units and Control Devices:

- Kaolin, Hull, Meal Handling Operations: Hull Grinding, Hull Storage, Hull Handling, Hull Pellet Cooler, Pellet Storage, Meal Handling, Meal Storage, Truck Meal Loadout, Two Barge/Rail Meal Loadout Operations

Pollutants with Emission Limits or Applicable Standards:

SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rules:

- 326 IAC 2-2, 6-3-2, 40 CFR 64

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Testing Records, Visible Emission Notations Records, Pressure Drop Reading Records, Calibration Records		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Observations and Comments:

I observed the equipment in operation during the inspection.
 D.4.1, 4.3, 4.6 – I observed the stack test records and deemed them complete. The records are the following:

Unit (Stack)	Most Recent Testing Date (PM, PM10, PM2.5)	Testing Requirement
Replacement Meal Handling Baghouse C9 (Stack 9)	6/24/2021	5 Years
Rail and Bulk Weigh System Baghouse C15A	11/14/2019	5 Years

D.4.2, 4.5 – I did not observe any visible emissions during the inspection. The control equipment has an efficiency of at least 99%. I observed the control equipment in operation during the inspection
 D.4.4 – I observed the preventive maintenance plan and deemed it adequate.
 D.4.7, 4.12 – I observed the daily visible emission notation records from January 2022 to present and deemed them complete.
 D.4.8, 4.9, 4.12 – I observed the daily pressure drop reading records from January 2022 to present and deemed them complete. The source has started using a computer database to record the pressure drop readings in real time. Mr. Hanes stated in the future they plan on recording all the readings electronically. I observed the calibration records from January 2022 to present and deemed them complete. The most recent gauge calibration for all the control equipment gauges was completed on April 12, 2024. These were completed in a timely manner. Gauge calibration is required every 6 months.

PERMIT SECTION D.4			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
Kaolin Handling Operation P3 (Baghouse C3)	Pressure Drop	3-9 in H2O	6.2 in H2O
Hull Storage and Operation P7 (Baghouse C7)	Pressure Drop	3-9 in H2O	3.7 in H2O
Hull Handling Operation P7A and P7B (Baghouse C7A)	Pressure Drop	3-9 in H2O	3.9 in H2O
Pellet Storage Buns P8A or P8B (Baghouse C8A or Bin Vent Filter System C8B)	Pressure Drop	3-9 in H2O	4.0 in H2O
Meal Storage P20 (Baghouse C20)	Pressure Drop	0.5-10 in H2O	7.2 in H2O
Hull Grinding P6 (Baghouse C6A & C6B)	Pressure Drop	1-9 in H2O	4.7 in H2O C6A 6.4 in H2O C6B
Meal Handling P9 (Baghouse P9)	Pressure Drop	1-9 in H2O	1.7 in H2O
Truck Meal Loadout P14 (Baghouse C14)	Pressure Drop	1-9 in H2O	3 in H2O
Barge/Railcar Meal Loadout P15 and Meal Loadout Operation P15B (Baghouse C15)	Pressure Drop	1-9 in H2O	1.2 in H2O
Rail & Barge Bulk Weigh System/P15A (Baghouse C15A)	Pressure Drop	1-9 in H2O	2.8 in H2O
Permit Section Compliance Status:			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

PERMIT SECTION E.1		
Emission Units and Control Devices:		
• 4 Natural Gas Boilers		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR 60 Subpart Dc, 326 IAC 12		
Applicability Information:		
Natural Gas Boilers		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Fuel Usage Records		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		

PERMIT SECTION E.1

I observed the equipment in operation during the inspection. The source conducts tune-ups of the boilers annually. The most recent tune up was conducted on April 24, 2024.
 60.48c(a) – The start-up notification was received on October 10, 2018.
 60.48c (i) – I observed the natural gas fuel usage records from January 2022 to present and deemed them complete. The source records usage monthly.

Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
N/A			

Permit Section Compliance Status:

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.2

Emission Units and Control Devices:

- One Soybean Oil Extraction Plant
- One Grain Terminal Plant

Pollutants with Emission Limits or Applicable Standards:

- SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rule:

326 IAC 12, 40 CFR 60 Subpart DD

Applicability Information:

Grain and Soybean Shipping and Receiving

Requirement:	Applicable	Violation Noted
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Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Types of Records Reviewed:

Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Observations and Comments:

I observed the equipment in operation during the inspection.
 60.302 – I did not observe any visible emission violations during the inspection.
 60.303 – The initial stack test was completed in July of 2002.

Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
Baghouse C34	Pressure Drop Reading in H2O	1-7 in H2O	0 in H2O
Baghouse C1	Pressure Drop Reading in H2O	1-7 in H2O	1.2 in H2O

Permit Section Compliance Status:

PERMIT SECTION E.2
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.3			
Emission Units and Control Devices:			
<ul style="list-style-type: none"> Two Fire Pump Engines (One constructed in 1997 and one in 2012) 			
Pollutants with Emission Limits or Applicable Standards:			
<input checked="" type="checkbox"/> SO ₂ <input checked="" type="checkbox"/> NO _x <input checked="" type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS			
Applicable Rule:			
326 IAC 12, 40 CFR 60 Subpart IIII			
Applicability Information:			
Fire Pump Engines			
Requirement:	Applicable	Violation Noted	
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Types of Records Reviewed: Hours of Operations and Maintenance Records			
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Observations and Comments:			
I observed the fire pumps on standby during the inspection. The fire pumps are equipped with non-resettable hour meters. At the time of the inspection the 1997 fire pump had a meter reading of 217 hours and the 2012 fire pump had a meter read of 311.6 hours. The source hires an outside contractor to complete semi-annual maintenance on the fire pumps. I observed documentation that the 2012 fire pump met EPA engine certifications.			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
N/A			
Permit Section Compliance Status:			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

PERMIT SECTION E.4
Emission Units and Control Devices:
<ul style="list-style-type: none"> Soybean Extraction
Pollutants with Emission Limits or Applicable Standards:
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS
Applicable Rule:
40 CFR 63 Subpart GGGG, 326 IAC 20-60
Applicability Information:

PERMIT SECTION E.4			
Existing Source Solvent Extraction for Vegetable Oil Production			
<u>Requirement:</u>	Applicable	Violation Noted	
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Types of Records Reviewed: Written Compliance Plan, SSM Plan, Monthly Hexane Solvent Tracking			
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<u>Observations and Comments:</u>			
<p>I observed the equipment in operation during the inspection.</p> <p>63.2850 – I observed the written compliance plan and deemed it adequate. 63.2852 – I observed the SSM and deemed it adequate. 63.2860 – The initial notification was submitted in a timely manner. 63.2861 – All reports have been submitted in a timely manner. 63.2862 – The source reported in their 2024 1st Quarterly Report the ratio of gallons of solvent per tons of soybeans processed was 0.099-gallon solvent loss/tons of soybeans processed in the twelve-month period ending March 2024. This is below the state permit limit of 0.16 gallons solvent loss/ ton of soybeans as noted in section D.3. I observed the loss ratio records from January 2022 to present and deemed them complete. The soybean extraction and distillation process are controlled by a mineral oil absorber system.</p>			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
Mineral Oil Absorber System	Inlet Vacuum Pressure	Cannot Exceed 10 in H2O	-5.41 in H2O
Mineral Oil Absorber System	Temperature Entering Absorber	Kept Below 105 degrees F	94.89 degrees F
Mineral Oil Absorber System	Flow Rate	Must be above 15 gal/min	67.55 gal/min
Mineral Oil Absorber System	Temperature of Oil Entering Stripping Column	Must be above 200 degrees F	245 degrees F
<u>Permit Section Compliance Status:</u>			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

PERMIT SECTION E.5
<u>Emission Units and Control Devices:</u>
<ul style="list-style-type: none"> • Soybean Oil Extraction Plant (One natural gas fired emergency generator and Two fire pumps) • Grain Terminal Plant (One emergency diesel generator)
<u>Pollutants with Emission Limits or Applicable Standards:</u>
<input checked="" type="checkbox"/> SO ₂ <input checked="" type="checkbox"/> NO _x <input checked="" type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS
<u>Applicable Rule:</u>
40 CFR 63 Subpart ZZZZ, 326 IAC 20-82
<u>Applicability Information:</u>

PERMIT SECTION E.5			
RICE with HP less or equal to 500 HP at a Major Source			
Requirement:	Applicable	Violation Noted	
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Types of Records Reviewed: Maintenance Records, Hours of Operation Records			
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Observations and Comments:			
I observed the equipment on standby during the inspection. The source hires an outside contractor to complete semi-annual maintenance in the emergency engines and fire pumps. The most recent maintenance service was completed on February 26, 2024, within a timely manner. The fire pumps comply with Subpart ZZZZ by complying with Subpart IIII. The hours of operation were the following: Fire pump 1997: 217 hours, Fire pump 2012: 311.6 hours, natural gas emergency generator: 729.8 hours, diesel emergency generator: 306.3 hours.			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
N/A			
Permit Section Compliance Status:			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

PERMIT SECTION E.6		
Emission Units and Control Devices:		
<ul style="list-style-type: none"> • Four Natural Gas Fired Boilers 		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR 63 Subpart DDDDD, 326 IAC 20-95		
Applicability Information:		
Existing Boilers		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Annual Tune Up Records and Fuel Usage Records		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		

PERMIT SECTION E.6			
I observed the boilers in operation during the inspection. The source conducts annual tune-ups of the boilers in a timely manner. The most recent tune up was completed on April 24, 2024. I observed the natural gas fuel records from January 2022 to present and deemed them complete.			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
N/A			
Permit Section Compliance Status:			
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed:	
<input checked="" type="checkbox"/> Annual Compliance Certification(s) <input type="checkbox"/> Deviation & Compliance Monitoring Report(s) <input type="checkbox"/> Annual Notification(s) <input checked="" type="checkbox"/> Emission Statement(s)	
The reports are consistent with inspection observations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68].	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, the employees have been trained.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Additional Information and Comments:	
None	
Additional Source Compliance Review Status:	
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:	

INSPECTION FINDINGS	
<input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection:	
RECOMMENDED ACTION	Issue inspection summary letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Mr. Hanes prior to exiting the facility.