

Received 7/1/2024 via OAQ Email



Louis Dreyfus Company LLC  
4800 Main Street  
Suite 600  
Kansas City, Missouri  
64112-2505  
United States

June 28, 2024

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

Re: Stack Test – RESPONSE ACTIONS  
Louis Dreyfus Company Agricultural Industries LLC  
Permit No. T085-43925-00102

To Whom It May Concern:

In accordance with Condition C.16 of our Part 70 Operating Permit referenced above, this letter describes our actions in response to the stack test results for Stack AF-6 (meal grinding) for testing performed April 18 & 19, 2024.

The results of the April 2024 test included filterable and condensable particulate. The combined results for Run 1 were below the applicable permit limits, while the combined results for Runs 2 and 3 were above. For all three runs, the filterable results were relatively low and consistent (between 0.21 and 0.3 lbs./hr.), while the higher condensable results for Runs 2 and 3 contributed to the exceedance of the combined limit for those runs and the overall average.

Although the filterable particulate results therefore did not indicate concerns, in an abundance of caution, we performed an inspection of the bags and a dye test shortly after receiving the results. As expected, no significant filter bag performance issues were identified.

Historically, condensable emissions results for this process have been consistent with the results of Run 1, which were well below the permitted emission limit. Although we have not identified a specific cause for the higher condensable emission results in Runs 2 & 3, we note that the extraction process had not been running smoothly the week of the test. Indeed, the test was originally planned to begin on April 16, but was delayed by two days until steady operation could be achieved for the duration of the runs. Therefore, it is possible that the April 2024 test results did not represent normal operation of the plant and that some temporary factor led to the condensable results for Runs 2 & 3.

We currently plan a re-test on or about July 9 to confirm compliance with the permit limitations and have submitted a protocol notice to IDEM for that purpose.



Louis Dreyfus Company is committed to conducting business in a safe and environmentally sustainable manner. If you have any questions or need any additional information regarding this report, please contact Mr. Andre Tenorio of my staff at 574-566-2105 or [Andre.Tenorio@ldc.com](mailto:Andre.Tenorio@ldc.com).

Sincerely,

DocuSigned by:  
  
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7/1/2024

Kevin Meland  
Regional Head of Safety, Health, and Environment – North America

cc: Andre Tenorio

Louis Dreyfus Company Agricultural Industries LLC Significant Permit Mod.: 085-45237-00102  
Claypool, Indiana Modified by: Tessa Dedek  
Permit Reviewer: Tamera Wessel

T085-43925-00102

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### COMPLIANCE AND ENFORCEMENT BRANCH Part 70 OPERATING PERMIT CERTIFICATION

Source Name: Louis Dreyfus Company Agricultural Industries LLC  
Source Address: 7344 State Road 15 South, Claypool, Indiana 46510-9746  
Mailing Address: 7344 State Road 15 South, Claypool, Indiana 46510-9746  
Part 70 Permit No.: OP T085-43925-00102

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

Please check what document is being certified.

Annual Compliance Certification Letter

Test Result (specify) \_\_\_\_\_


Report (specify) \_\_\_\_\_

Notification (specify) \_\_\_\_\_

Affidavit (specify) \_\_\_\_\_

Other (specify) [Response steps for stack test](#) \_\_\_\_\_

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

Signature:  \_\_\_\_\_

Printed Name: [Kevin Meland](#) \_\_\_\_\_

Title/Position: [Regional Head of Safety, Health, and Environment - NAM](#) \_\_\_\_\_

Phone: [912 547-5328](#) \_\_\_\_\_

Date: [7/1/2024](#) \_\_\_\_\_