



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 2, 2024

VIA ELECTRONIC MAIL

Rick Sims
AC Grain
225 Briarwood Avenue
Dana, IN, 47847
Rick_sims@acgrain.com

Re: Inspection Summary Letter
AC Grain
Source ID: 165-00015
Dana, Vermillion County

Dear Rick Sims:

On June 25, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of AC Grain, located at 225 Briarwood Avenue in Dana, 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 Mirmehdi Seyyedi at 317-432-0558 or by email at mseyyedi@idem.in.gov

Sincerely,

Mirmehdi Seyyedi, Compliance Inspector
Compliance Section 3
Office of Air Quality

ACES ID: 298784

ENCLOSURE

cc: Mirmehdi Seyyedi, Compliance and Enforcement Branch, Office of Air Quality
Vermillion County Health Department

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



SOURCE INFORMATION	
SOURCE NAME	AC Grain
SOURCE LOCATION	225 Briarwood Avenue Dana, Indiana Vermillion County
MAILING ADDRESS	225 Briarwood Avenue, Dana, IN, 47847
PLANT ID	165-00015
<u>PERMIT INFORMATION</u>	Permit Type: TVOP Permit Number: 165-40658-00015 Permit Expiration Date: 2/5/2029 VFC Document No.(hyperlink): 82686813
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 type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input checked="" type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The source is a grain elevator facility located in Dana, Indiana.

INSPECTION INFORMATION			
INSPECTED BY	Mirmehdi Seyyedi		
INSPECTION DATE AND TIME	June 25, 2024	TIME IN: 11:40 AM	TIME OUT: 1:40 PM
REPORTED BY	Mirmehdi Seyyedi	REPORT DATE: 7/1/2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	10/9/2018-6/25/2024		
<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"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: N/A <input type="checkbox"/> Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 298784	Complaint: N/A	Violation/Warning/ N/A
RM TRACKING NUMBER(S)	Complaint: N/A		
<u>INSPECTION BACKGROUND</u>	The latest violation was recorded on 11/4/2021, stating that the source failed to properly submit their QRs in 2020 and to list the violations in their 2019 ACC. No violation has been recorded ever since.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Rick Sims	Operation Manager	-	Rick-sims@acgrain.com
Cameron Hupp	General Manager	-	-

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
10/9/2018	CMS	Violations Noted	AC Grain failed to maintain daily visible emission notations on September 21, 2018, July 31, 2018, and July 18-22, 2016, in

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
			violation of FESOP No. 165- 39251-00015, Condition D.1.7(b).

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
<i>Date Issued</i>	<i>Action Taken</i>	<i>Describe Violation(s)</i>	
11/4/2021	Violation Letter	In their 2020 ACC, AC Grain reported violations of permit conditions C.19 and D.1.9 by submitting improperly completed QRs in 2020. Moreover, they failed to list the violations in their 2019 ACC.	
10/9/2018	Violation Letter	AC Grain failed to maintain daily visible emission notations on September 21, 2018, July 31, 2018, and July 18-22, 2016, in violation of FESOP No. 165- 39251-00015, Condition D.1.7(b).	
Formal Enforcement Actions			
<i>Case Number</i>	<i>Enforcement Type</i>	<i>Civil Penalty</i>	<i>Describe Violation(s)</i>
N/A			
Other Relevant Actions			
<i>Action Taken</i>	<i>Comments</i>		
N/A	N/A		

PERMIT SECTION D.1
Emission Units and Control Devices:
<p>(a) One (1) open grain receiving operation, identified as EU101, constructed in 1995, collectively controlled by one (1) baghouse identified as CE01, with emissions exhausted through vent VE01 to the atmosphere and consisting of the following:</p> <p>(1) One (1) underground truck dump pit, identified as Dump Pit 1, with a maximum capacity of 550 tons/hour.</p> <p>(b) One (1) grain loadout operation, consisting of two (2) load out stations, collectively identified as EU103, constructed in 1995, a combined maximum capacity of 166 tons/hour with emissions venting without control.</p> <p>(c) One (1) completely enclosed belt conveyor system, consisting of ten (10) enclosed belt conveyors constructed prior to 1995, collectively identified as EU105, with emissions exhausted to the atmosphere, with a combined maximum throughput of 675 tons/hour.</p> <p>(d) One (1) completely enclosed bucket conveyor system, consisting of seven (7) enclosed bucket conveyors constructed prior to 1995, collectively identified as EU106, with emissions exhausted to the atmosphere, with a combined maximum throughput of 675 tons/hour.</p> <p>(e) One (1) completely enclosed drag conveyor system, consisting of seven (7) enclosed drag conveyors constructed prior to 1995, collectively identified as EU107, with emissions exhausted to the atmosphere, with a combined maximum throughput of 675 tons/hour.</p> <p>(f) One (1) completely enclosed grain auger system, identified as EU108, with emissions exhausted to the atmosphere, with maximum throughput of 100 tons/hour.</p> <p>(g) Two (2) completely enclosed storage silos, collectively identified as EU109, with emissions exhausted to the atmosphere, with a maximum combined storage capacity of 90,000 bushels.</p>

PERMIT SECTION D.1

- (h) Six (6) completely enclosed storage silos, collectively identified as EU110, with emissions exhausted to the atmosphere, with a maximum combined storage capacity of 645,000 bushels.
- (i) One (1) grain receiving operation, identified as EU102, consisting of two (2) underground receiving pits, identified as Pit 1 and Pit 2, each constructed in 2013, with a combined maximum capacity of 1250 tons/hour consisting of the following:
 - (1) Pit 1, controlled by eight (8) filters, identified as CE02 - CE09, with emissions exhausted to the atmosphere through four (4) vents, VE02-VE05; and
 - (2) Pit 2, controlled by eight (8) filters, identified as CE10 - CE17, with emissions exhausted to the atmosphere through four (4) vents, VE06-VE09.
- (j) One (1) grain load out operation, identified as EU104, constructed in 2013, consisting of the following:
 - (1) Two (2) load out stations, identified as load out 1 and load out 2, with a combined maximum capacity of 1500 tons/hour, with particulate emissions controlled by baghouses CE18 and CE19, with emissions exhausting through VE18-VE19.
- (k) One (1) enclosed storage warehouse, constructed in September 2013, identified as EU111, with emissions exhausted to the atmosphere, and a storage capacity of 9,500,000 bushels, including one (1) wet storage bin with a maximum storage capacity of 145,000 bushels.
- (l) One (1) natural gas-fired column grain dryer, identified as EU113, constructed in September 2013, with a maximum heat input capacity of 108.0 MMBtu/hr and a maximum throughput rate of 250 tons/hr. The dryer is loaded by the bucket elevator wet leg, identified as BE-430, and emptied by the bucket elevator dry leg, identified as DC-460.
- (m) Two (2) grain storage bins, collectively identified as EU115, each with a maximum storage capacity of 760,000 bushels, loaded by an enclosed drag conveyor from the existing pits/legs, equipped with a reclaim system connected to the reclaim conveyor, approved in 2015 for construction and utilizing no controls.

Pollutants with Emission Limits or Applicable Standards:

SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rules:

326 IAC 6-3-2

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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input 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:
 Receiving (input) and loadout (output) throughput records
 Visible emission daily notations

Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Observations and Comments:

PERMIT SECTION D.1

- The general information of the source is as follows:
 - o Working days and hours: Monday – Friday, 8 AM – 4:30
 - o Number of employees: 9 (full time)
- The records showing the daily visible notations from baghouses and filters (CE01 through CE19) stacks exhausts (VE01 through VE09, VE18 and VE19) were checked and deemed to be sufficient. The notations were recorded by a trained employee who has been working at the source for 11 years.
- The preventive maintenance plan for different units were reviewed and deemed to be sufficient.
- The monthly (and accumulative 12 month rolling) throughput records of the source were checked, and the source deemed to be in compliance. For instance, the records for the months of April and June 2024 were as follows:

April

(the data are recorded in bushels, and each bushel is approximately equal to 60 lbs)

Input (Receiving)	Soybean: 141000 Bushels = 4230 ton	Total input: 15750 ton
	Corn: 384000 Bushels = 11520 ton	
Output (Loadout)	Soybean: 15000 Bushels = 450 ton	Total output: 60450 ton
	Corn: 2000000 Bushels = 60000 ton	

June (till June 25th)

(the data are recorded in bushels, and each bushel is approximately equal to 60 lbs)

Input (Receiving)	Soybean: 175000 Bushels = 5250 ton	Total input: 30930 ton
	Yellow corn: 856000 Bushels = 25680 ton	
Output (Loadout)	Soybean: 214000 Bushels = 6420 ton	Total output: 29910 ton
	Yellow corn: 783000 Bushels = 23490 ton	

The records were in consistent with what was stated in quarterly reports.

- The dryer was last used in November 2023, when 1442000 bushels (=43260 ton) were dried in that month.
- No violation of practice or unusual emission was observed during the inspection tour.

Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
N/A	N/A	N/A	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.1

Emission Units and Control Devices:

PERMIT SECTION E.1

- (i) One (1) grain receiving operation, identified as EU102, consisting of two (2) underground receiving pits, identified as Pit 1 and Pit 2, each constructed in 2013, with a combined maximum capacity of 1250 tons/hour consisting of the following:
 - (1) Pit 1, controlled by eight (8) filters, identified as CE02 - CE09, with emissions exhausted to the atmosphere through four (4) vents, VE02-VE05; and
 - (2) Pit 2, controlled by eight (8) filters, identified as CE10 - CE17, with emissions exhausted to the atmosphere through four (4) vents, VE06-VE09.

- (j) One (1) grain load out operation, identified as EU104, constructed in 2013, consisting of the following:
 - (1) Two (2) loadout stations, identified as loadout 1 and loadout 2, with a combined maximum capacity of 1500 tons/hour, with particulate emissions controlled by baghouses CE18 and CE19, with emissions exhausting through VE18-VE19.

- (k) One (1) enclosed storage warehouse, constructed in September 2013, identified as EU111, with emissions exhausted to the atmosphere, and a storage capacity of 9,500,000 bushels, including one (1) wet storage bin with a maximum storage capacity of 145,000 bushels.

- (l) One (1) natural gas-fired column grain dryer, identified as EU113, constructed in September 2013, with a maximum heat input capacity of 108.0 MMBtu/hr and a maximum throughput rate of 250 tons/hr. The dryer is loaded by the bucket elevator wet leg, identified as BE-430, and emptied by the bucket elevator dry leg, identified as DC-460.

- (m) Two (2) grain storage bins, collectively identified as EU115, each with a maximum storage capacity of 760,000 bushels, loaded by an enclosed drag conveyor from the existing pits/legs, equipped with a reclaim system connected to the reclaim conveyor, approved in 2015 for construction and utilizing no controls.

Pollutants with Emission Limits or Applicable Standards:

SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rule:

40 CFR Part 60, Subpart DD

Applicability Information:

The rule applies since the source is a grain terminal elevator and grain storage elevator.

<u>Requirement:</u>	<u>Applicable</u>	<u>Violation Noted</u>
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 type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Types of Records Reviewed:

The stack test results from 2015

Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input 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 type="checkbox"/> No

Observations and Comments:

- The results of latest stack test are as follows:

PERMIT SECTION E.1			
PM emission rate: 0.0005 gr/dscf (measured by method 5, allowable emission rate: 0.01 gr/dscf)			
Opacity: 0% (measured by method 9, allowable emission rate: 10%)			
<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: N/A			

PERMIT SECTION E.2		
Emission Units and Control Devices:		
(a) One (1) diesel-fired emergency generator, identified as EU116, constructed in 2002, permitted in 2018, with a maximum capacity of 53.4 horsepower (hp), using no control, and exhausting outdoors.		
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 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 ZZZZ		
Applicability Information:		
The rule applies because the source owns and operates a CI (Compression Ignition) RICE (Reciprocating Internal Combustion Engine) emergency generator.		
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 type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input 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 operation records Maintenance records		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
<ul style="list-style-type: none"> - The emergency generator is equipped with a non-resettable hour meter, and the source keeps track of operation hours. - The source usually runs the engine less than half an hour per month. The operation hours do not exceed the limit of 100 hours per year. - The source performs maintenance at least once per year including oil change. 		

PERMIT SECTION E.2			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
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: N/A			

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed:	
<input checked="" type="checkbox"/> Annual Compliance Certification(s) <input type="checkbox"/> Annual Notification(s)	<input checked="" type="checkbox"/> Deviation & Compliance Monitoring Report(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 checked="" type="checkbox"/> Yes <input 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:	
N/A	
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: N/A	

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 Rick Sims prior to exiting the facility.