



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: June 20, 2005
RE: The Andersons Clymers Terminal / MSOP 017-20237-00023
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05



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MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

The Andersons Clymers Terminal County Roads 300S and 350W Clymers, Indiana 46947

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units 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.

Operation Permit No.: MSOP 017-20237-00023	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 20, 2005 Expiration Date: June 20, 2010

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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 terminal that has grain receiving, drying, cleaning, storage and loading facilities with control.

Authorized Individual: President Grain Division
Source Address: County Roads 300S and 350W, Clymers, Indiana 46947
Mailing Address: P.O. Box 119, Maumee, Ohio 43537
General Source Phone: (419) 891-2915
SIC Code: 5153
County Location: Cass
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) truck dump hopper, constructed in 1974, enclosed on 3 sides with particulate emissions controlled by a baghouse, identified as # 1.
- (b) One (1) rail/truck dump hopper, constructed in 1974, enclosed on 2 sides with particulate emissions controlled by a baghouse, identified as # 1.
- (c) One (1) rail car/truck loading site, constructed in 1974, with no emission controls.
- (d) One (1) Berico natural gas-fired dryer, constructed in 1974, with a maximum throughput capacity of 3,000 bushel per hour and a maximum heat input capacity of 16.5 million British thermal units (MMBtu) per hour with screen house enclosure.
- (e) One (1) grain cleaner, constructed in 1974, rated at 15,000 bushels per hour with particulate emissions controlled by a baghouse, identified as # 2.
- (f) Four million (4,000,000) bushel grain storage capacity with no emission controls.
- (g) Four hundred thousand (400,000) bushel grain storage capacity with particulate emissions controlled by a baghouse, identified as # 2.
- (h) Two (2) grain legs, constructed in 1974, with a maximum capacity of 7,500 bushel per hour, with particulate emissions controlled by a baghouse, identified as # 2.
- (i) One (1) hopper bottom truck grain receiving process, constructed in 2002, consisting of one (1) enclosed drag conveyor with a maximum design throughput of 1,000,000 bushels of corn and soybeans per year, with particulate emissions controlled by one (1) conveyor enclosure.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) 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.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (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 or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.10 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] [IC13-17-3-2][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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.11 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.12 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.13 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

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:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.8 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

C.9 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.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall 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 facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (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.13 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, all record keeping requirements not already legally required shall be implemented when operation begins.

C.14 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 Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (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) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description: Grain Terminal

- (a) One (1) truck dump hopper, constructed in 1974, enclosed on 3 sides with particulate emissions controlled by a baghouse, identified as # 1.
- (b) One (1) rail/truck dump hopper, constructed in 1974, enclosed on 2 sides with particulate emissions controlled by a baghouse, identified as # 1.
- (c) One (1) rail car/truck loading site, constructed in 1974, with no emission controls.
- (d) One (1) Berico natural gas-fired dryer, constructed in 1974, with a maximum throughput capacity of 3,000 bushel per hour and a maximum heat input capacity of 16.5 million British thermal units (MMBtu) per hour with screen house enclosure.
- (e) One (1) grain cleaner, constructed in 1974, rated at 15,000 bushels per hour with particulate emissions controlled by a baghouse, identified as # 2.
- (f) Four million (4,000,000) bushel grain storage capacity with no emission controls.
- (g) Four hundred thousand (400,000) bushel grain storage capacity with particulate emissions controlled by a baghouse, identified as # 2.
- (h) Two (2) grain legs, constructed in 1974, with a maximum capacity of 7,500 bushel per hour, with particulate emissions controlled by a baghouse, identified as # 2.
- (i) One (1) hopper bottom truck grain receiving process, constructed in 2002, consisting of one (1) enclosed drag conveyor with a maximum design throughput of 1,000,000 bushels of corn and soybeans per year, with particulate emissions controlled by one (1) conveyor enclosure.

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

Emission Limitations and Standards

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the hopper bottom truck grain receiving process except when otherwise specified in 40 CFR 60, Subpart DD.

D.1.2 Standards for Particulate Matter (PM) [40 CFR 60.302]

On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than five percent (5%) opacity.

D.1.3 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the Berico grain dryer shall not exceed 49.65 pounds per hour when operating at a process weight rate of 84 tons per hour.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the grain receiving operation shall not exceed 40.85 pounds per hour when operating at a process weight rate of 33.79 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the internal operation shall not exceed 40.85 pounds per hour when operating at a process weight rate of 33.79 tons per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the bin loading operation shall not exceed 40.85 pounds per hour when operating at a process weight rate of 33.79 tons per hour.
- (e) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the shipping operation shall not exceed 40.85 pounds per hour when operating at a process weight rate of 33.79 tons per hour.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of any inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name: The Andersons Clymers Terminal
Address: County Roads 300S and 350W
City: Clymers , Indiana 46947
Phone #: (419) 891-2915
MSOP #: M 017-20237-00023

I hereby certify that The Andersons Clymers Terminal is
 still in operation. no longer in operation.

I hereby certify that The Andersons Clymers Terminal is
 in compliance with the requirements of MSOP 017-20237-00023.
 not in compliance with the requirements of MSOP 017-20237-00023.

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:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**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 ?_____, 100TONS/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 PERM LIMIT OF _____

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

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

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ 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)

MALFUNCTION RECORDED 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:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	The Andersons Clymers Terminal
Source Location:	County Roads 300S and 350W, Clymers, Indiana 46947
County:	Cass
SIC Code:	5153
Operation Permit No.:	017-11404-00023
Operation Permit Issuance Date:	April 14, 2000
Permit Renewal No.:	017-20237-00023
Permit Reviewer:	Amy Cook

The Office of Air Quality (OAQ) has reviewed an application from The Andersons Clymers Terminal relating to the construction and operation of a grain terminal that has grain receiving, drying, cleaning, storage and loading facilities with control.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) truck dump hopper, constructed in 1974, enclosed on 3 sides with particulate emissions controlled by a baghouse, identified as # 1.
- (b) One (1) rail/truck dump hopper, constructed in 1974, enclosed on 2 sides with particulate emissions controlled by a baghouse, identified as # 1.
- (c) One (1) rail car/truck loading site, constructed in 1974, with no emission controls.
- (d) One (1) Berico natural gas-fired dryer, constructed in 1974, with a maximum throughput capacity of 3,000 bushel per hour and a maximum heat input capacity of 16.5 million British thermal units (MMBtu) per hour with screen house enclosure.
- (e) One (1) grain cleaner, constructed in 1974, rated at 15,000 bushels per hour with particulate emissions controlled by a baghouse, identified as # 2.
- (f) Four million (4,000,000) bushel grain storage capacity with no emission controls.
- (g) Four hundred thousand (400,000) bushel grain storage capacity with particulate emissions controlled by a baghouse, identified as # 2.
- (h) Two (2) grain legs, constructed in 1974, with a maximum capacity of 7,500 bushel per hour, with particulate emissions controlled by a baghouse, identified as # 2.
- (i) One (1) hopper bottom truck grain receiving process, constructed in 2002, consisting of one (1) enclosed drag conveyor with a maximum design throughput of 1,000,000 bushels

of corn and soybeans per year, with particulate emissions controlled by one (1) conveyor enclosure.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP 017-11404-00023, issued on April 14, 2000;
- (b) Notice Only Change 017-15720-00023, issued on December 10, 2002; and
- (c) Minor Permit Revision 017-16600-00023, issued on September 19, 2003.

All conditions from previous approvals were incorporated into this permit except for the following:

- (a) MSOP 017-11404-00023, issued on April 4, 2000
 - (1) Condition: D.1.4 Particulate Matter (PM)

Reason not incorporated: The source does not need controls to comply with the limits of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Therefore, Condition D.1.4 has been removed.
 - (2) Condition: Compliance Monitoring consisting of D.1.5 (Baghouse Inspections) and D.1.6 (Broken or Failed Bag Detection)

Reason not incorporated: The Compliance Monitoring conditions (D.1.5 and D.1.6) have been removed because the potential to emit (PTE) particulate from the emission units is such that the baghouses are not necessary to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), or any other requirement.
- (b) Minor Permit Revision 017-16600-00023, issued on September 19, 2003

Condition: D.1.5 Testing Requirements

Reason not incorporated: This requirement is covered under 40 CFR 60, Subpart A. Therefore, Condition D.1.5 has been removed.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

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 January 7, 2005.

Emission Calculations

Detailed emission calculations are provided in Appendix A (pages 1 through 4) of this document.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	141.20
PM-10	56.58
SO ₂	0.04
VOC	0.40
CO	6.07
NO _x	7.23
HAPs	0.00

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM is less than two hundred fifty (250) tons per year and the potential to emit for all other regulated criteria pollutants is less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM2.5	Attainment
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_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_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass

County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (b) Cass County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	66.63
PM-10	17.19
SO ₂	0.04
VOC	0.40
CO	6.07
NOx	7.23
HAPs	0.00

- (a) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Minor Source Operating Permit (MSOP) application submitted by the company.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit MSOP 017-20237-00023, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) 40 CFR 60.300, Subpart DD – Standards of Performance for Grain Elevators
- (1) There are no requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.300, Subpart DD), for the following emission units, the truck dump hopper, rail/truck dump hopper, rail car/truck loading site, grain dryer, grain cleaner, grain storage and grain legs, included in this permit because they were constructed in 1974 prior to the August 3, 1978 applicability date.
 - (2) The hopper bottom truck grain receiving process is subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.300, Subpart DD), because it is a truck unloading facility and was constructed after the August 3, 1978 applicability date. Pursuant to 40 CFR 60.302(c)(1), on and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than five percent (5%) opacity.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not one of the twenty-eight (28) listed source categories, and the potential to emit (PTE) of all criteria pollutants is less than two hundred fifty (250) tons per year. Therefore, this source is not a major source, and the requirements of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead in the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter County.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the grain terminal that has grain receiving, drying, cleaning, storage and loading facilities will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

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).

State Rule Applicability – Individual Facilities

326 IAC 8-1-6 (New Facilities; General Reduction Requirements (BACT))

- (a) The truck dump hopper, rail/truck dump hopper, rail car/truck loading site, grain dryer, grain cleaner, grain storage, and grain legs were constructed prior to January 1, 1980 and have potential VOC emissions of less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 (BACT) does not apply.
- (b) The hopper bottom truck grain receiving process was constructed after January 1, 1980, however it has potential VOC emissions of less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 (BACT) does not apply.

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

- (a) The one (1) Berico 3,000 bushel per hour column grain dryer is subject to particulate matter (PM) limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from the grain dryer shall be limited by the following equation:

$$E = 55.0P^{0.11} - 40 \text{ (for process weights in excess of 60,000 lbs/hr)}$$

Where E = maximum allowable PM emission rate (lbs/hr)

$$P = \text{process weight (tons/hr): } (3,000 \text{ bu/hr}) * (56\text{lb/bu}) * (1 \text{ ton}/2,000 \text{ lb}) = 84 \text{ tons/hr}$$

$$E = 55.0(84^{0.11}) - 40 = 49.65 \text{ lbs/hr}$$

Potential uncontrolled emissions from the grain dryer (18.48 lbs/hr) are less than the allowable emissions (49.65 lbs/hr), therefore, the one (1) Berico 3,000 bushel per hour column grain dryer will comply with the requirements of 326 IAC 6-3-2.

- (b) The grain receiving operation is subject to particulate matter (PM) limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from the grain receiving operation shall be limited by the following equation:

$$E = 55.0P^{0.11} - 40 \text{ (for process weights in excess of 60,000 lbs/hr)}$$

Where E = maximum allowable PM emission rate (lbs/hr)

$$P = \text{process weight (tons/hr): } (296,000 \text{ tons/yr}) * (1 \text{ yr}/8760 \text{ hr}) = 33.79 \text{ tons/hr}$$

$$E = 55.0(33.79^{0.11}) - 40 = 40.85 \text{ lbs/hr}$$

Potential uncontrolled emissions from the grain receiving operation (4.76 lbs/hr) are less than the allowable emissions (40.85 lbs/hr), therefore, the grain receiving operation will comply with the requirements of 326 IAC 6-3-2.

- (c) The internal operation (which consists of cleaning) is subject to particulate matter (PM) limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from internal operation shall be limited by the following equation:

$$E = 55.0P^{0.11} - 40 \text{ (for process weights in excess of 60,000 lbs/hr)}$$

Where E = maximum allowable PM emission rate (lbs/hr)

$$P = \text{process weight (tons/hr): } (296,000 \text{ tons/yr}) * (1 \text{ yr}/8760 \text{ hr}) = 33.79 \text{ tons/hr}$$

$$E = 55.0(33.79^{0.11}) - 40 = 40.85 \text{ lbs/hr}$$

Potential uncontrolled emissions from the internal operation (6.51 lbs/hr) are less than the allowable emissions (40.85 lbs/hr), therefore, the internal operation will comply with the requirements of 326 IAC 6-3-2.

- (d) The bin loading operation is subject to particulate matter (PM) limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from the bin loading operation shall be limited by the following equation:

$$E = 55.0P^{0.11} - 40 \text{ (for process weights in excess of 60,000 lbs/hr)}$$

Where E = maximum allowable PM emission rate (lbs/hr)

$$P = \text{process weight (tons/hr): } (296,000 \text{ tons/yr}) * (1 \text{ yr}/8760 \text{ hr}) = 33.79 \text{ tons/hr}$$

$$E = 55.0(33.79^{0.11}) - 40 = 40.85 \text{ lbs/hr}$$

Potential uncontrolled emissions from the bin loading operation (1.59 lbs/hr) are less than the allowable emissions (40.85 lbs/hr), therefore, the bin loading operation will comply with the requirements of 326 IAC 6-3-2.

- (e) The shipping operation is subject to particulate matter (PM) limitations under 326 IAC 6-3-2. Pursuant to this rule, particulate emissions from the shipping operation shall be limited by the following equation:

$$E = 55.0P^{0.11} - 40 \text{ (for process weights in excess of 60,000 lbs/hr)}$$

Where E = maximum allowable PM emission rate (lbs/hr)

$$P = \text{process weight (tons/hr): } (296,000 \text{ tons/yr}) * (1 \text{ yr}/8760 \text{ hr}) = 33.79 \text{ tons/hr}$$

$$E = 55.0(33.79^{0.11}) - 40 = 40.85 \text{ lbs/hr}$$

Potential uncontrolled emissions from the shipping operation (0.87 lbs/hr) are less than the allowable emissions (40.85 lbs/hr), therefore, the shipping operation will comply with the requirements of 326 IAC 6-3-2.

Compliance Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not as grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The operation of this grain terminal that has grain receiving, drying, cleaning, storage and loading facilities with control shall be subject to the conditions of the **Minor Source Operating Permit 017-20237-00023**

Appendix A: Emission Calculations

Company Name: Andersons Clymers Terminal
Address City IN Zip: County Roads 300S and 350W, Clymers, IN 46947
Permit Number: M 017-20237-00023
Pit ID: 017-00023
Reviewer: Amy Cook
Date: 01-Apr

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Column Grain Dryer	Grain Elevator	TOTAL
PM	0.14	80.94	60.12	141.20
PM10	0.55	20.24	35.79	56.58
SO2	0.04	0.00	0.00	0.04
NOx	7.23	0.00	0.00	7.23
VOC	0.40	0.00	0.00	0.40
CO	6.07	0.00	0.00	6.07
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Column Grain Dryer	Grain Elevator	TOTAL
PM	0.14	59.49	7.00	66.63
PM10	0.55	14.87	1.77	17.19
SO2	0.04	0.00	0.00	0.04
NOx	7.23	0.00	0.00	7.23
VOC	0.40	0.00	0.00	0.40
CO	6.07	0.00	0.00	6.07
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations
Grain Elevator
Country Elevator-Small

Company Name: Andersons Clymers Terminal
Address City IN Zip: County Roads 300S and 350W, Clymers, Indiana 46947
Permit Number: M 017-20237-00023
Plt ID: 017-00023
Reviewer: Amy Cook
Date: April 1, 2005

GRAIN TYPE	BUSHEL RECEIVED PER YEAR	BUSHEL WEIGHTS (lb/bu)
Corn:	8,000,000	56
Soybeans:	1,500,000	56
Wheat:	1,000,000	60

State Potential Emissions (uncontrolled):					
	GRAIN RECEIVING	INTERNAL OPERATIONS*	BIN LOADING	SHIPPING	TOTAL
Maximum Annual Corn Throughput (tons/yr)	224,000	224,000	224,000	224,000	
Maximum Annual Soybean Throughput (tons/yr)	42,000	42,000	42,000	42,000	
Maximum Annual Wheat Throughput (tons/yr)	30,000	30,000	30,000	30,000	
Corn PM Emission Factor in lb/ton	0.1500	0.2050	0.0500	0.0275	
Soybean PM Emission Factor in lb/ton	0.1500	0.2050	0.0500	0.0275	
Wheat PM Emission Factor in lb/ton	0.0600	0.0820	0.0200	0.0110	
Corn PM10 Emission Factor in lb/ton	0.0375	0.2000	0.0125	0.0075	
Soybean PM10 Emission Factor in lb/ton	0.0375	0.2000	0.0125	0.0075	
Wheat PM10 Emission Factor in lb/ton	0.0150	0.0800	0.0050	0.0030	
Corn Dustiness Ratio (DR)	2.5	2.5	2.5	2.5	
Soybean Dustiness Ration (DR)	2.5	2.5	2.5	2.5	
Wheat Dustiness Ratio (DR)	1.0	1.0	1.0	1.0	
Potential PM Emissions (tons/yr)	20.85	28.50	6.95	3.82	60.12
Potential PM10 Emissions (tons/yr)	5.21	27.80	1.74	1.04	35.79

Federal Potential Emissions (controlled):					
	GRAIN RECEIVING	INTERNAL OPERATIONS*	BIN LOADING	SHIPPING	TOTAL
Potential PM Emissions (tons/yr)	20.85	28.50	6.95	3.82	
Potential PM10 Emissions (tons/yr)	5.21	27.80	1.74	1.04	
Control Equipment (1)	baghouse	baghouse	N/A	baghouse	
Control Efficiency	99.90%	99.90%	0.00%	99.90%	
Controlled PM Emissions (tons/yr)	0.02	0.03	6.95	0.00	7.00
Controlled PM10 Emissions (tons/yr)	0.01	0.03	1.74	0.00	1.77

Note:

* The internal operation emission factor only includes grain cleaning, since that is the only operation performed.

Methodology:

Emission factors are from U.S.EPA's AP-42, Interim Section 9.9.1, 11/95, Table 9.9.1-2 (Interim Uncontrolled Particulate Emission Factors for Grain Elevators)

Maximum Annual Throughput (tons/yr) = Bushels received per year (bu/yr) * Grain Weight (lb/bu) * (1 ton/2000 lbs)

Potential PM/PM10 Emissions (tons/yr) = Annual Throughput (tons/yr) * PM/PM10 Emission Factor (lb/ton) * Dustiness Ratio * (1 ton/2000 lbs)

Controlled PM/PM10 Emissions (tons/yr) = Potential Uncontrolled PM/PM10 Emissions (tons/yr) * (1 - Control Efficiency)

Appendix A: Emissions Calculations
Column Grain Dryer Emission Calculations

Company Name: Andersons Clymers Terminal
Address City IN Zip: County Roads 300S and 350W, Clymers, IN 46947
Permit Number: M 017-20237-00023
Plt ID: 017-00023
Reviewer: Amy Cook
Date: 01-Apr

Emission Calculations for one (1) 3,000 bu/hr column grain dryer:

State Potential Emissions (uncontrolled):						
Dryer Capacity (bu/hr)	Bushel Weight (lbs/bu)	PM Emission Factor (lbs PM/ton) * DR	PM10 Emission Factor (lbs PM10/ton) * DR	Dustiness Ratio (1) (DR) (for mixed grains)	Potential Uncontrolled PM Emissions (tons/yr)	Potential Uncontrolled PM10 Emissions (tons/yr)
3,000	56	0.088	0.022	2.50	80.94	20.24
Federal Potential Emissions (controlled):						
Potential Uncontrolled PM Emissions (tons/yr)	Potential Uncontrolled PM10 Emissions (tons/yr)	Control Device Type	Capture System Capture Efficiency (%)	Control Device Control Efficiency (%)	Potential Controlled PM Emissions (tons/yr)	Potential Controlled PM10 Emissions (tons/yr)
80.94	20.24	Perforation Plate	n/a	73.50%	59.49	14.87

Methodology:

Emission factors are from U.S.EPA's AP-42, Interim Section 9.9.1, 11/95, Table 9.9.1-2 (Interim Uncontrolled Particulate Emission Factors for Grain Elevators)

Potential Uncontrolled PM/PM10 Emissions (tons/yr) = Dryer Capacity (bu/hr) * Bushel Weight (lbs/bu) * (1 ton/2,000 lbs) * PM/PM10 Emission Factor (lbs PM/ton) * Dustiness Ratio

Potential Controlled PM/PM10 Emissions (tons/yr) = Potential Uncontrolled PM/PM10 Emissions (tons/yr) * [1 - (Capture Efficiency * Control Efficiency)]

atio (DR) * (8,760 hrs/yr) * (1 ton/2,000 lbs)

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler**

Company Name: Andersons Clymers Terminal
Address City IN Zip: County Roads 300S and 350 W , Clymers, Indiana 46947
Permit Number: M 017-20237-00023
Pit ID: 017-00023
Reviewer: Amy Cook
Date: April 1, 2005

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

16.5

144.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.14	0.55	0.04	7.23	0.40	6.07

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton



**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

Company Name:
Address City IN Zip:
Permit Number:
Plt ID:
Reviewer:
Date:

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.518E-04	8.672E-05	5.420E-03	1.301E-01	2.457E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.614E-05	7.950E-05	1.012E-04	2.746E-05	1.518E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.