



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: April 18, 2007
RE: The Anderson, Inc. / 015-23110-00035
FROM: Nisha Sizemore
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 03/23/06



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**The Andersons, Inc. - Delphi Cob Operations
3902 North Anderson Drive
Delphi, Indiana 46923**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: MSOP 015-23110-00035	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 18, 2007 Expiration Date: April 18, 2012

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONDITIONS	5
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Certification	
B.9	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13	Permit Renewal [326 IAC 2-6.1-7]	
B.14	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15	Source Modification Requirement	
B.16	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]	
B.17	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18	Annual Fee Payment [326 IAC 2-1.1-7]	
B.19	Credible Evidence [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS	10
	Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6.8-10-3]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements	
C.10	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
	Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]	
C.11	Malfunctions Report [326 IAC 1-6-2]	
C.12	General Record Keeping Requirements[326 IAC 2-6.1-5]	
C.13	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
D.1	EMISSION UNIT OPERATION CONDITIONS	14
	Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
D.1.1	Particulate [326 IAC 6-3-2]	
D.1.2	Preventive Maintenance Plan [326 IAC 1-6-3]	

TABLE OF CONTENTS (Continued)

Compliance Determination Requirements

D.1.3 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Visible Emissions Notations

D.1.5 Parametric Monitoring

D.1.6 Broken or Failed Bag Detection

D.1.7 Cyclone Failure Detection

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

Annual Notification	17
Malfunction Report	18
Certification Form	20

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 corn cob processing facility.

Source Address:	3902 North Anderson Drive, Delphi, Indiana 46923
Mailing Address:	P.O. Box 119, Maumee, Ohio 43537
General Source Phone:	(765) 564-6133
SIC Code:	3999
County Location:	Carroll
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 Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) cob receiving station (truck), identified as CR1, constructed prior to 1987, with a maximum throughput capacity of 15 tons of cobs per hour, with uncontrolled emissions exhausting to the atmosphere.
- (b) One (1) temporary outdoor cob storage pile, SP1, with a maximum throughput capacity of 15 tons of cobs per hour.
- (c) One (1) cob handling system, consisting of totally enclosed legs, conveyors and cleaners, identified as CH1, constructed prior to 1987, with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (BH1), and exhausting to stack S1.
- (d) One (1) cob milling system, consisting of a fully enclosed cob mill, identified as CM1, constructed prior to 1987, with the ground corn cobs pneumatically conveyed to a storage silo (Silo1), with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (BH2), and exhausting to stack S2.
- (e) Twenty-six (26) storage bins for storing ground corn cobs, identified as Storage 1, constructed prior to 1987, with a maximum throughput capacity of 15 tons of cobs per hour, with emissions controlled by bin vent filters.
- (f) One (1) natural gas-fired cob dryer, identified as CD1, constructed prior to 1987, with a maximum throughput of 12 tons of cobs per hour, with dryer burners having a maximum capacity of 10.0 MMBtu/hour of natural gas, using a cyclone for particulate control, and exhausting to stack S3.
- (g) One (1) cob packaging and shipping station (truck and rail), identified as CS1, constructed prior to 1987, with a maximum throughput capacity of 30 tons of cobs per hour, with uncontrolled emissions exhausting to the atmosphere.
- (h) Paved and unpaved roads and parking lots with public access.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 015-23110-00035, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This

certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1)

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 015-23110-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this .

- (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
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(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)]

B.15 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 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.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(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
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) 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
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 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.

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

C.11 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.12 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 within ninety (90) days of permit issuance.

C.13 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
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do 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

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) cob receiving station (truck), identified as CR1, constructed prior to 1987, with a maximum throughput capacity of 15 tons of cobs per hour, with uncontrolled emissions exhausting to the atmosphere.
- (b) One (1) temporary outdoor cob storage pile, SP1, with a maximum throughput capacity of 15 tons of cobs per hour.
- (c) One (1) cob handling system, consisting of totally enclosed legs, conveyors and cleaners, identified as CH1, constructed prior to 1987, with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (BH1), and exhausting to stack S1.
- (d) One (1) cob milling system, consisting of a fully enclosed cob mill, identified as CM1, constructed prior to 1987, with the ground corn cobs pneumatically conveyed to a storage silo (Silo1), with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (BH2), and exhausting to stack S2.
- (e) Twenty-six (26) storage bins for storing ground corn cobs, identified as Storage 1, constructed prior to 1987, with a maximum throughput capacity of 15 tons of cobs per hour, with emissions controlled by bin vent filters.
- (f) One (1) natural gas-fired cob dryer, identified as CD1, constructed prior to 1987, with a maximum throughput of 12 tons of cobs per hour, with dryer burners having a maximum capacity of 10.0 MMBtu/hour of natural gas, using a cyclone for particulate control, and exhausting to stack S3.
- (g) One (1) cob packaging and shipping station (truck and rail), identified as CS1, constructed prior to 1987, with a maximum throughput capacity of 30 tons of cobs per hour, with uncontrolled emissions exhausting to the atmosphere.
- (h) Paved and unpaved roads and parking lots with public access.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the cob receiving, handling, cob milling, cob drying, cob storage and cob shipping facilities shall be limited as shown in the following table:

Emissions Unit Description	Process Weight Rate (tons/hr)	Allowable Particulate Emissions (lbs/hour)
Cob Receiving	15	25.2
Handling	6	13.6
Cob Milling	6	13.6
Cob Drying	12	21.7
Storage	15	25.2
Shipping	30	40.0

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

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

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

D.1.2 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 the cob handling system (CH1), cob milling system (CM1), dryer (CD1), and the pneumatic conveyance for Storage1 and their control devices.

Compliance Determination Requirements

D.1.3 Particulate Control

- (a) Pursuant to 326 IAC 6-3-2, and in order to comply with condition D.1.1, the baghouses and filters for particulate control shall be in operation and control emissions from the cob handling system (CH1), cob milling system (CM1), dryer (CD1) and storage bins (Storage1) at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Visible Emissions Notations

- (a) Daily visible emission notations of the cob handling system, cob milling system, and dryer stack exhausts (S1, S2, and S3) and the storage bin's vents shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses (BH1 and BH2) used in conjunction with the cob handling system and cob milling system, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument

Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain a daily record of visible emission notations of the cob handling system, cob milling system, and dryer stack exhausts (S1, S2, and S3) and the storage bin's vents. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain a daily record of the pressure drop across the baghouses (BH1 and BH2) used in conjunction with the cob handling system and cob milling system. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (c) 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, Inc. - Delphi Cob Operations
Address:	3902 North Anderson Drive
City:	Delphi, Indiana 46923
Phone #:	(419) 891-2915
MSOP #:	015-23110-00035

I hereby certify that The Andersons, Inc. - Delphi Cob Operations is : still in operation.
 no longer in operation.

I hereby certify that The Andersons, Inc. - Delphi Cob Operations is : in compliance with the requirements of MSOP 015-23110-00035
 not in compliance with the requirements of MSOP 015-23110-00035

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 - 317 233-6865

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 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: ____/____/20____ ____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 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

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: The Andersons, Inc. - Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, Indiana 46923
Mailing Address: P.O. Box 119, Maumee, Ohio 43537
MSOP No.: 015-23110-00035

This certification shall be included when submitting any application form, report, compliance monitoring, or other documents as required by the applicable requirements in this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

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:

Title/Position:

Date:

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

**Addendum to the Technical Support Document
for a Minor Source Operating Permit (MSOP)**

Source Background and Description

Source Name:	The Andersons, Inc. - Delphi Cob Operations
Source Location:	3902 North Anderson Drive, Delphi, Indiana 46923
County:	Carroll
SIC Code:	3999
Operation Permit No.:	M015-23110-00035
Permit Reviewer:	ERG/ST

On March 7, 2007, the Office of Air Quality (OAQ) had a notice published in the Carroll County Comet, Flora, Indiana, stating that The Andersons, Inc. - Delphi Cob Operations had applied for a Minor Source Operating Permit (MSOP) to operate a stationary corn cob processing facility with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes.

1. IDEM has determined that a Preventative Maintenance Plan is required for the emission units and their control devices having Compliance Monitoring requirements. The Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. In order to clarify the requirements for preventative maintenance plans, Condition D.1.2 - Preventative Maintenance Plan, has been added to the permit. The other conditions in Section D.1 have been renumbered and the Table of Contents has been updated to reflect this change.

D.1.2 Preventative 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 the cob handling system (CH1), cob milling system (CM1), dryer (CD1), and the pneumatic conveyance for Storage1 and their control devices.

2. The baghouse ID number for the cob milling system was listed incorrectly in the draft of the permit that went to Public Notice. IDEM has revised the permit as follows:

A.2 Emission Units and Pollution Control Equipment Summary

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

...

- (d) One (1) cob milling system, consisting of a fully enclosed cob mill, identified as CM1, constructed prior to 1987, with the ground corn cobs pneumatically conveyed to a storage silo (Silo1), with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (~~BH4~~ BH2), and exhausting to stack S2.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

...

- (d) One (1) cob milling system, consisting of a fully enclosed cob mill, identified as CM1, constructed prior to 1987, with the ground corn cobs pneumatically conveyed to a storage silo (Silo1), with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (~~BH4~~ BH2), and exhausting to stack S2.

- 3. In order to comply with the requirements of 326 IAC 6-3-2, it is necessary for the Permittee to operate the baghouses and filters controlling particulate emissions from the cob handling system (CH1), cob milling system (CM1), dryer (CD1) and storage bins (Storage1) at all times that these facilities are in operation. The stack exhausts and silo vents for this source always vent outdoors. Also, it is IDEM's intent that the Permittee keep daily records for all compliance monitoring conditions in the permit. In order to clarify the requirements in the permit, IDEM, OAQ has revised the Compliance Determination Requirements, Compliance Monitoring Requirements and the Record Keeping and Reporting Requirements as follows:

Compliance Determination Requirements

D.1.3 Particulate Control

- (a) Pursuant to 326 IAC 6-3-2, and in order to comply with condition D.1.1, the baghouses and filters for particulate control shall be in operation and control emissions from the cob handling system (CH1), cob milling system (CM1), dryer (CD1) and storage bins (Storage1) at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

~~D.1.2~~ D.1.4 Visible Emissions Notations

- (a) Daily visible emission notations of the cob handling system, cob milling system, and dryer stack exhausts (S1, S2, and S3) and the ~~site's~~ storage bin's vents shall be performed during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part

of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

~~D.1.3~~ **D.1.5** Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses (BH1 and BH2) used in conjunction with the cob handling system and cob milling system, at least once per day when the process is in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

~~D.1.6~~ **D.1.8** Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain **a daily** records of ~~daily~~ visible emission notations of the cob handling system, cob milling system, and dryer stack exhausts (S1, S2, and S3) and the ~~site's storage bin's vents, or maintain a record of why visible emission notations were not taken.~~ **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).**
 - (b) To document compliance with Condition D.1.3, the Permittee shall maintain **a daily** ~~weekly~~ records of the ~~total static~~ pressure drop **across the baghouses (BH1 and BH2) used in conjunction with the cob handling system and cob milling system** ~~during normal operation when venting to the atmosphere.~~ **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).**
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
4. IDEM, OAQ examined whether The Andersons Inc. - Delphi Cob Operations (M015-23110-00035) and The Andersons Inc. - Delphi Grain Operations (MSOP 015-20598-00026) should be considered one "source" as defined at 326 IAC 1-2-73.

In order for these two plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

IDEM has determined that:

- (1) The two plants are owned by the same company.
- (2) The plants do not have the same two-digit Standard Industrial Classification (SIC) Code. The Andersons, Inc. - Delphi Cob Operations is primarily engaged in grinding corn cobs and packaging them for sale. The ground cobs are purchased as a material for animal litter and spill absorbers and operates under the two-digit SIC Code of 39 for Miscellaneous Manufacturing Industries. The Andersons Inc. - Delphi Grain Operations is primarily engaged in grain wholesaling and operates under the two-digit SIC Code of 51 for Wholesale Trade-Non-Durable Goods. Neither plant serves as a support facility for the other. A support facility is a plant that dedicates at least 50% of its output to another plant. None of the products produced by either plant is sent to the other.
- (3) The Andersons, Inc. - Delphi Cob Operations (source number 15-00035) is located on a property adjacent to The Andersons Inc. - Delphi Grain Operations (source number 15-00026) in Delphi, Indiana.

IDEM, OAQ has determined that the Andersons, Inc. - Delphi Cob Operations and The Andersons Inc. - Delphi Grain Operations do not meet all the criteria of 326 IAC 1-2-73. They are not one source and will be permitted as two separate sources.

5. The *Existing Approvals* section of the TSD contains the following errors:

- (1) Permit 08-08-85-0075, issued October 9, 1981, was incorrectly listed as a previous permit issued to this source. However, this permit is for a grain receiving and loading facility located at The Andersons Inc. - Delphi Grain Operations (see MSOP 015-20598-00026, issued July 26, 2005).
- (2) The *Existing Approvals* section of the TSD should have included Operating Permit 08-08-85-0074, issued on October 9, 1981 for a #2 fuel oil fired cob dryer used in the cob milling plant. This cob dryer has since been removed.
- (3) The *Existing Approvals* section of the TSD lists an Exemption Construction and Operation Status letter dated June 30, 1986. This Exemption was issued for a cob burner that was used to provide heat to a dryer. The cob burner is not listed in the draft permit, TSD, or Appendix A because this cob burner has been permanently disconnected and is not currently operational. Should the Permittee, in the future, wish to place this equipment back into service, the Permittee must submit a permit revision application with IDEM, OAQ to apply for approval for this modification.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

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

Source Background and Description

Source Name:	The Andersons, Inc. - Delphi Cob Operations
Source Location:	3902 North Anderson Drive, Delphi, Indiana 46923
County:	Carroll
SIC Code:	3999
Operation Permit No.:	M015-23110-00035
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a MSOP application from The Andersons, Inc. - Delphi Cob Operations relating to the operation of a stationary corn cob processing facility.

Existing Emission Units and Pollution Control Equipment

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

- (a) One (1) cob receiving station (truck), identified as CR1, constructed prior to 1987, with a maximum throughput capacity of 15 tons of cobs per hour, with uncontrolled emissions exhausting to the atmosphere.
- (b) One (1) temporary outdoor cob storage pile, SP1, with a maximum throughput capacity of 15 tons of cobs per hour.
- (c) One (1) cob handling system, consisting of totally enclosed legs, conveyors and cleaners, identified as CH1, constructed prior to 1987, with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (BH1), and exhausting to stack S1.
- (d) One (1) cob milling system, consisting of a fully enclosed cob mill, identified as CM1, constructed prior to 1987, with the ground corn cobs pneumatically conveyed to a storage silo (Silo1), with a maximum throughput capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse (BH2), and exhausting to stack S2.
- (e) Twenty-six (26) storage bins for storing ground corn cobs, identified as Storage 1, constructed prior to 1987, with a maximum throughput capacity of 15 tons of cobs per hour, with emissions controlled by bin vent filters.
- (f) One (1) natural gas-fired cob dryer, identified as CD1, constructed prior to 1987, with a maximum throughput of 12 tons of cobs per hour, with dryer burners having a maximum capacity of 10.0 MMBtu/hour of natural gas, using a cyclone for particulate control, and exhausting to stack S3.
- (g) One (1) cob packaging and shipping station (truck and rail), identified as CS1, constructed prior to 1987, with a maximum throughput capacity of 30 tons of cobs per hour, with uncontrolled emissions exhausting to the atmosphere.
- (h) Paved and unpaved roads and parking lots with public access.

New Emission Units

There are no new emission units planned for this source.

Existing Approvals

The source has been operating under permits 08-08-85-0072, 08-08-85-0073, and 08-08-85-0075 (dates of issuance unknown), and an Exempt Construction and Operation Status letter dated June 30, 1986.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justifications such that the bin vent filters on the storage silo (Silo1) be considered as an integral part of the cob milling process:

The filter on the silo is considered integral to the process because the product throughput from the milling operation (CM1) is pneumatically conveyed to the storage bins (Storage1) and the filter separates product from air when the product has reached its destination. The primary purpose of the filter is for product capture. The bin vent filters cost \$2,500 per year to operate and save \$16,200 per year by preventing loss of product.

IDEM, OAQ evaluated the justifications and agreed that the bin vent filter will be considered as an integral part of the storage bins (Storage 1).

Enforcement Issue

Pursuant to 326 IAC 2-6.1-2, this source should have applied for a MSOP by December 25, 1998. A Referral of Enforcement has been submitted and IDEM is investigating this matter.

Stack Summary

Operation	Stack ID	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Internal Handling	S1	18.3	1.3 x 5.0	13,400	Ambient
Milling	S2	18.3	1.3 x 5.0	13,400	Ambient
Cob Dryer	S3	30.0	4.0	15,000	160 - 220

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 May 19, 2006, with additional information received on June 22, 2006 and July 20, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7).

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	42.2
PM-10	13.5
SO ₂	0.03
VOC	0.24
CO	3.61
NO _x	4.29
Single HAP (hexane)	0.077
Total HAPs	0.081

Note: since the bin vent filters on the silos are deemed integral to the process, the particulate emissions from the silos include the effect of these filters.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM is greater than 25 tons per year and 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) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (c) **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 applicability.

County Attainment Status

The source is located in Carroll County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: Effective October 25, 2006, the Indiana Air Pollution Control Board approved a permanent rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) Carroll County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section.
- (b) 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 ozone. Carroll County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

- (c) Carroll County has been classified as attainment or unclassifiable in Indiana for all other 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-Entire Source section.

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	28.2
PM-10	9.26
SO ₂	0.03
VOC	0.24
CO	3.6
NO _x	4.29
Single HAP	0.077
Combination HAPs	0.081

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on information submitted by the source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is 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 the PTE calculations provided in Appendix A.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.300, Subpart DD) are not included in this permit for the cob dryer because this source is not a grain terminal elevator or grain storage elevator.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit.

State Rule Applicability – Entire Source

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

This cob processing plant is not in 1 of the 28 source categories. There are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions are not counted towards applicability of PSD.

This source was constructed prior to 1987. Although the exact construction date for this source is not known, the potential uncontrolled emissions of PM, PM10, NO_x, SO₂, CO and VOC are less than 250 tons per year.

Therefore, this source is an existing minor source under PSD and the construction of this source did not trigger PSD review. There have been no modifications to this source since 1987.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is a minor source under Section 112 of the Clean Air Act and this source has not installed any new major sources of HAPs after July 27, 1997. Therefore the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Carroll County, is not required to operate under a Part 70 permit, and emits less than five (5) tons per year of lead. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 6-4 (Fugitive Dust Emissions)

The source is subject to 326 IAC 6-4 (Fugitive Dust Emissions) because the source maintains paved and unpaved roads and parking lots with public access and temporary storage piles. Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Carroll County.

- (a) This source is not located in any of the areas listed in 326 IAC 6-5-1(a). Therefore, this source is not subject to the requirements of 326 IAC 6-5.
- (b) This source did not receive all of the necessary preconstruction approvals prior to December 13, 1985. However, the fugitive particulate emissions from the paved and unpaved roads and parking lots are negligible. Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the cob receiving, handling, cob milling, cob drying, cob storage and cob shipping facilities shall be limited as shown in the following table:

Emissions Unit Description	Process Weight Rate (tons/hr)	Allowable Particulate Emissions (lbs/hour)
Cob Receiving	15	25.2
Handling	6	13.6

Emissions Unit Description	Process Weight Rate (tons/hr)	Allowable Particulate Emissions (lbs/hour)
Cob Milling	6	13.6
Cob Drying	12	21.7
Storage	15	25.2
Shipping	30	40.0

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Particulate emissions from handling and milling are controlled by baghouses. Particulate emissions from the dryer are controlled by a cyclone. Calculations indicate that the source is able to comply with the particulate emission limits prior to the effect of any controls (see Appendix A).

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the facilities at this source are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The cob handling system, cob milling system, dryer, and silos have applicable compliance monitoring conditions as specified:
 - (a) Daily visible emission notations of the cob handling system, cob milling system, and dryer stack exhausts (S1, S2, and S3) and the silo's vents shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in

accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (b) The Permittee shall record the pressure drop across the baghouses (BH1 and BH2) used in conjunction with the cob handling system and cob milling system, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (c) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.
- (d) In the event that cyclone failure has been observed, the failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the control devices must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-6.1 (MSOP).

Conclusion

The operation of this stationary cob processing facility shall be subject to the conditions of the Minor Source Operating Permit 015-23110-00035.

Appendix A: Emission Calculations
PM and PM10 Emissions From the Cob Handling, and Drying Processes

Company Name: The Andersons, Inc. - Delphi Cob Operations
 Address: 3902 North Anderson Drive, Delphi, Indiana 46923
 MSOP: M015-23110-00035
 Reviewer: ERG/ST
 Date: February 12, 2007

Emissions Unit Description	Maximum Throughput (tons/hour)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PTE of PM Before Control (tons/year)	PTE of PM10 Before Control (tons/year)	PTE of PM After Control (tons/year)	PTE of PM10 After Control (tons/year)
Receiving - Straight Truck	15	0.18	0.059	none	NA	11.8	3.88	11.8	3.88
Internal Handling	6	0.061	0.034	Baghouse	99%	1.60	0.89	0.016	0.009
Milling (SCC 3-02-008-17)	6	0.012	0.012	Baghouse	99%	0.32	0.32	0.003	0.003
Storage Bins	15	0.025	0.0063	Bin Filter	99%	1.64	0.41	0.016	0.004
Drying	12	0.22	0.055	Cyclone	90%	11.6	2.89	1.16	0.29
Shipping - Truck	30	0.086	0.029	none	NA	11.3	3.81	11.3	3.81
Totals						38.3	12.2	24.3	7.99

Emission factors are from AP 42 Tables 9.9.1-1 and 9.9.1-2 Particulate Emission Factors for Grain Elevators (4/03)

Methodology

PTE of PM/PM10 Before Control (tons/year) = Maximum Throughput (tons/hour) x Emission factor (lbs/ton) x 8760 hours/year x 1 ton/2,000 lbs
 PTE of PM/PM10 After Control (tons/year) = PTE of PM/PM10 Before Control (tons/year) x (1- Control Efficiency (%))

Appendix A: Emission Calculations
PM and PM10 Emissions From the Grain Handling, Storage and Drying Processes
Compliance with 326 IAC 6-3-2

Company Name: The Andersons, Inc. - Delphi Cob Operations
 Address: 3902 North Anderson Drive, Delphi, Indiana 46923
 MSOP: M015-23110-00035
 Reviewer: ERG/ST
 Date: February 12, 2007

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum Throughput (tons/hour)	PTE of PM Before Control (lbs/hour)	PTE of PM10 Before Control (lbs/hour)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hour)	PTE of PM After Control (lbs/hour)	PTE of PM10 After Control (lbs/hour)	PTE of PM After Control (tons/year)	PTE of PM10 After Control (tons/year)
Receiving - Straight Truck	15	2.70	0.89	25.2	2.70	0.89	11.8	3.88
Internal Handling	6	0.37	0.20	13.6	0.004	0.002	0.02	0.01
Milling (SCC 3-02-008-17)	6	0.07	0.07	13.6	0.001	0.001	0.00	0.00
Storage Bins	15	0.38	0.09	25.2	0.004	0.001	0.02	0.00
Drying	12	2.64	0.66	21.7	0.264	0.066	1.16	0.29
Shipping - Truck	30	2.58	0.87	40.0	2.58	0.87	11.3	3.81

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Calculations show that the emission units are in compliance with the requirements of 326 IAC 6-3-2 before the use of control devices.

Methodology

Figures for Maximum Throughput, PTE of PM/PM10 Before Control, and PTE of PM/PM10 After Control are from page 1.

PTE of PM/PM10 Before Control (lbs/hour) = PTE of PM/PM10 Before Control (tons/year) x 1 ton/2,000 lbs / 8760 hours/year

PTE of PM/PM10 After Control (lbs/hour) = PTE of PM/PM10 After Control (tons/year) x 1 ton/2,000 lbs / 8760 hours/year

**Appendix A: Emission Calculations
Cob Drying - Natural Gas Combustion**

Company Name: The Andersons, Inc. - Delphi Cob Operations
 Address: 3902 North Anderson Drive, Delphi, Indiana 46923
 MSOP: M015-23110-00035
 Reviewer: ERG/ST
 Date: February 12, 2007

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
10.0	85.9

	Pollutant							
	PM*	PM10*	SO ₂	NO _x **	VOC	CO	Single HAP	Total HAPs
Emission Factor (lb/MMCF)	1.9	7.6	0.60	100	5.5	84.0	1.80	1.89
Potential to Emit (tons/yr)	0.08	0.33	0.03	4.3	0.24	3.6	0.077	0.081

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

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 98)

Methodology

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 (hours/year) x 1 MMCF/1,020 MMBtu

PTE (tons/year) = Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM and PM10 Emissions From Cob Storage Pile (Fugitive)

Company Name: The Andersons, Inc. - Delphi Cob Operations
 Address: 3902 North Anderson Drive, Delphi, Indiana 46923
 MSOP: M015-23110-00035
 Reviewer: ERG/ST
 Date: February 12, 2007

1. Emission Factors:

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

$$E_f = \frac{.0032 \times (U/5)^{1.3} \times k}{(M/2)^{1.4}}$$

where:

E_f = Emission Factor (lbs/ton)
 k = Particle size multiplier = 1 for PM and 0.35 for PM10
 U = Mean wind speed (mph) = 12 mph
 M = Moisture content (%) = 8.0 %

Therefore,

PM Emission Factor = 0.0014 lbs/ton process
 PM10 Emission Factor = 0.0005 lbs/ton process

2. Uncontrolled PM/PM10 emissions from storage piles:

Max. Throughput Rate: 15.00 tons/hr
 Uncontrolled PM = 4.44 (ton/hr) x 0.0008 (lbs/ton) x 5110 (hrs/yr) x 1 ton/2000 lbs = **0.094 tons/yr**
 Uncontrolled PM10 = 4.44 (ton/hr) x 0.0008 (lbs/ton) x 5110 (hrs/yr) x 1 ton/2000 lbs = **0.033 tons/yr**

3. Controlled PM/PM10 emissions from storage piles:

Max. Throughput Rate: 15.00 tons/hr
 Controlled PM = Uncontrolled PM emissions (tons/yr) x (1-Control Efficiency (%)) = **0.0047 tons/yr**
 Controlled PM10 = Uncontrolled PM10 emissions (tons/yr) x (1-Control Efficiency (%)) = **0.0016 tons/yr**

Note: Cobs are stored outdoors under a tarpaulin. Long-term control efficiency is estimated at 95%.

**Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads**

Company Name: The Andersons, Inc. - Delphi Cob Operations
 Address: 3902 North Anderson Drive, Delphi, Indiana 46923
 MSOP: M015-23110-00035
 Reviewer: ERG/ST
 Date: February 12, 2007

1. Emission Factors:

According to AP-42, Chapter 13.2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = k \times (sL/2)^a \times (w/3)^b - C$$

where:

E = emission factor (lb/vehicle mile traveled)
 sL = road surface silt loading (g/m²) = 0.6 (g/m²) (AP-42, Table 13.2.1-3)
 w = mean vehicle weight (tons) = 25.0 tons (see the calculations below)
 k = empirical constant = 0.082 for PM and 0.016 for PM10
 a = empirical constant = 0.65
 b = empirical constant = 1.5
 C = emission factor for vehicle exhaust, etc. = 0.00047 for PM and PM10 (AP-42, Table 13.2.1-2)

PM Emission Factor = $0.082 \times (0.6/2)^{0.65} \times (21.5/3)^{1.5} - 0.00047$ = **0.90 lbs/mile**

PM10 Emission Factor = $0.016 \times (0.6/2)^{0.65} \times (21.5/3)^{1.5} - 0.00047$ = **0.18 lbs/mile**

length of paved roads in one direction = **0.25 mile**

2. Potential to Emit (PTE) of PM/PM10 from Paved Roads:

Vehicle Type	Trucks per day	Average Vehicle Weight	Total Trip Number	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(trips/yr)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
Straight Truck	5.5	25	2,000	100%	25.00	1,000	0.45	0.09

Trucks unload 43,200 tons of cobs and ship 28,800 tons of cobs annually.

Methodology

Component Vehicle Weight = Average Vehicle Weight (tons) x Traffic Component (%)

VMT(miles/year) = 0.1 mile/trip x 2 x Total Trip Numbers (trips/year)

PTE of PM/PM10 (tons/year) = VMT (miles/year) x Emission Factor (lbs/mile) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Fugitive Emissions From Unpaved Roads**

Company Name: The Andersons, Inc. - Delphi Cob Operations
 Address: 3902 North Anderson Drive, Delphi, Indiana 46923
 MSOP: M015-23110-00035
 Reviewer: ERG/ST
 Date: February 12, 2007

1. Emission Factors:

According to AP-42, Chapter 13.2.2 - Unpaved Roads (12/03), the PM/PM10 emission factors for unpaved roads can be estimated from the following equation:

$$E = k \times (s/12)^a \times (w/3)^b$$

where:

E = emission factor (lb/vehicle mile traveled)
 s = surface material silt content (%) = 4.8 % (AP-42, Table 13.2.2-1)
 w = mean vehicle weight (tons) = 25.0 tons (see the calculations below)
 k = empirical constant = 4.9 for PM and 1.5 for PM10
 a = empirical constant = 0.7 for PM and 0.9 for PM10
 b = empirical constant = 0.45 for PM and PM10

PM Emission Factor = $4.9 \times (4.8/12)^{0.7} \times (21.5/3)^{0.45}$ = **6.7 lbs/mile**

PM10 Emission Factor = $1.5 \times (4.8/12)^{0.9} \times (21.5/3)^{0.45}$ = **1.7 lbs/mile**

length of unpaved roads in one direction = **0.25 mile**

2. Potential to Emit (PTE) of PM/PM10 from Unpaved Roads:

Vehicle Type	* Trucks per day	*Average Vehicle Weight	* Total Trip Number	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(trips/year)	(%)	(tons)	(miles/year)	(tons/year)	(tons/year)
Straight Truck	5.5	25	2,000	100.0%	25.0	1,000	3.3	0.85

Trucks unload 43,200 tons of cobs and ship 28,800 tons of cobs annually.

Methodology

Component Vehicle Weight = Average Vehicle Weight (tons) x Traffic Component (%)

VMT(miles/year) = 0.1 mile/trip x 2 x Total Trip Numbers (trips/year)

PTE of PM/PM10 (tons/year) = VMT (miles/year) x Emission Factor (lbs/mile) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Summary**

Company Name: The Andersons, Inc. - Delphi Cob Operations
 Address: 3902 North Anderson Drive, Delphi, Indiana 46923
 MSOP: M015-23110-00035
 Reviewer: ERG/ST
 Date: February 12, 2007

Emission Unit	Pollutant								
	Before Control		After Control		SO ₂	NOx	VOC	CO	HAPs
	PM	PM10	PM	PM10					
Receiving - Straight Truck	11.8	3.88	11.8	3.88	0	0	0	0	0
Internal Handling	1.60	0.89	0.016	0.009	0	0	0	0	0
Milling	0.32	0.32	0.003	0.003	0	0	0	0	0
Storage Bins	1.64	0.41	0.016	0.004	0	0	0	0	0
Drying	11.6	2.89	1.16	0.29	0	0	0	0	0
Shipping - Truck	11.3	3.81	11.3	3.81	0	0	0	0	0
Cob Drying	0.08	0.33	0.08	0.33	0.03	4.29	0.24	3.61	0.08
Storage Pile	0.094	0.033	0.005	0.002	0	0	0	0	0
Paved Roads	0.45	0.088	0.45	0.088	0	0	0	0	0
Unpaved Roads	3.35	0.85	3.35	0.85	0	0	0	0	0
Totals	42.2	13.5	28.2	9.26	0.03	4.29	0.24	3.61	0.08