INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 19, 2007

RE: The Anderson's Inc. / 071-23743-00013

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

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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

The Andersons Inc. Seymour Wholesale Terminal
101 Agrico Lane
Seymour, Indiana 47274

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F071-23743-00013	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 19, 2007 Expiration Date: June 19, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 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 2-8-3(b)]

The Permittee owns and operates a stationary granulated lime fertilizer manufacturing source.

Source Address:	101 Agrico Lane, Seymour, Indiana 47274
Mailing Address:	P.O. Box 119, Maumee, Ohio 43537
General Source Phone Number:	419-891-2957
SIC Code:	2874
County Location:	Jackson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:
One (1) fertilizer production line consisting of the following:

(a) One (1) granulator, identified as EU-01, exhausting to Stack S1, equipped with one (1) wet scrubber for particulate control, identified as WS1, capacity: 30 tons per hour of granulated lime. The granulator was installed in 1964-1965. The scrubber was installed in 1993.

(b) One (1) dryer, identified as EU-02, exhausting to Stack S2, equipped with two (2) cyclones, identified as Cycl1 and Cycl1A, and one (1) wet scrubber, identified as WS2, for particulate control, capacity: 30 tons per hour of granulated lime. The dryer was installed in 1964-1965. The cyclones were installed in 1991. The scrubber was installed in 1993.

(c) One (1) natural gas fired burner for the dryer, identified as EU-04, exhausting to Stack S2, rated at 16 million British thermal units per hour. The burner was installed in 1964-1965.

(d) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, exhausting through the general ventilation system, equipped with two (2) cyclones identified as 2A and 2, and one (1) baghouse identified as BH1 for particulate control, capacity: 30 tons per hour of granulated lime. The screening unit was installed in 1964-1965. The cyclones and baghouse were installed in 1991.

(e) One (1) crusher, associated with the screening and classifying process of granulated lime, installed in 2000, capacity: 10 tons per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) One (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour. [326 IAC 6-2-3]

(b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(d) Purge double block and bleed valves.

(e) One (1) liquid fertilizer production process. There are no air emissions of any criteria pollutants from this process.

(f) One (1) Soil Vapor Extraction system for a soil remediation project.

(g) Other categories with emissions below insignificant thresholds.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F071-23743-00013, 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 [326 IAC 2-8-6]

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 [326 IAC 2-8-4(4)]

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 [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(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 [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(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 Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report 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) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) 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.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F071-23743-00013 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months 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 2-8 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.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(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
MC 61-53 IGCN 1003
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 may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
MC 61-53 IGCN 1003
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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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.

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 Stack Height [326 IAC 1-7]

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

C.8 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
MC 61-52 IGCN 1003
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.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 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
MC 61-53 IGCN 1003
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.10 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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification 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).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) 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.

(d) 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).

(e) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]:

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

One (1) fertilizer production line consisting of the following:

(a) One (1) granulator, identified as EU-01, exhausting to Stack S1, equipped with one (1) wet scrubber for particulate control, identified as WS1, capacity: 30 tons per hour of granulated lime. The granulator was installed in 1964-1965. The scrubber was installed in 1993.

(b) One (1) dryer, identified as EU-02, exhausting to Stack S2, equipped with two (2) cyclones, identified as Cycl1 and Cycl1A, and one (1) wet scrubber, identified as WS2, for particulate control, capacity: 30 tons per hour of granulated lime. The dryer was installed in 1964-1965. The cyclones were installed 1991. The scrubber was installed in 1993.

(c) One (1) natural gas fired burner for the dryer, identified as EU-04, exhausting to Stack S2, rated at 16 million British thermal units per hour. The Burner was installed in 1964-1965.

(d) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, exhausting through the general ventilation system, equipped with two (2) cyclones identified as 2A and 2, and one (1) baghouse identified as BH1 for particulate control, capacity: 30 tons per hour of granulated lime. The screening unit was installed in 1964-1965. The cyclones and baghouse were installed in 1991.

(e) One (1) crusher, associated with the screening and classifying process of granulated lime, installed in 2000, capacity: 10 tons per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 PM and PM_{10} Emission Limitations [326 IAC 2-8-4][326 IAC 2-2]

(a) The PM and PM_{10} emissions from the granulator (EU-01), and the dryer (EU-02) shall be limited to the following:

(1) The throughput of granulated lime for the granulator (EU-01) shall be limited to 262,800 tons per consecutive twelve (12) month period and 0.461 pounds of PM/PM_{10} per ton of granulated lime processed.

(2) The throughput of granulated lime for the dryer (EU-02) shall be limited to 262,800 tons per consecutive twelve (12) month period and 0.226 pounds of PM/PM_{10} per ton of granulated lime processed.

(b) Compliance with these limits will limit the source wide potential to emit of PM and PM_{10} to less than one hundred (100) tons per consecutive twelve (12) month period and render the requirements of 326 IAC 2-7 and 326 IAC 2-2 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the allowable PM emission rate from the one (1) granulator, identified as EU-01, the one (1) dryer, identified as EU-02, and the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05 shall not exceed 40.0 pounds per hour, each, when operating at a process weight rate of 30 tons per hour.

The pound per hour limitation was calculated with 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;
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

In order to comply with Conditions D.1.1, and D.1.2, the cyclones, wet scrubbers, and baghouse for PM and PM_{10} control shall be in operation at all times when the one (1) fertilizer production line is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a) (1)]

D.1.5 Visible Emissions Notations

(a) Visible emission notations of each scrubber and baghouse stack exhaust shall be performed once per day 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.1.6 Wet Scrubber Parametric Monitoring

The Permittee shall record the liquid flow rate and the pressure drop as well as the flow rate of scrubbant and make-up water across the two (2) scrubbers, identified as WS1 and WS2 used in conjunction with the one (1) granulator, identified as EU-01, and the one (1) dryer, identified as EU-02, respectively, at least once per day when the granulator and/or the dryer are in operation.

(a) When for any one reading, the flow rate of the scrubber is less than the normal minimum of 175 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

(b) When for any one reading, the flow rate of the make-up water is less than the normal minimum of 6.0 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

(c) When for any one reading, the pressure drop across the scrubber, identified as WS1, is outside the normal range of 0.5 to 4.0 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 or Exceedances.

(d) When for any one reading, the pressure drop across the scrubber, identified as WS2, is outside the normal range of 7.0 to 13.0 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 or Exceedances.

A pressure reading that is outside the above mentioned range or a flow rate that is below the above mentioned minimum 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 instruments used for determining the pressure drop and flow rate 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.1.7 Failure Detection

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.8 Baghouse Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, at least once per day when the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05 is in operation. When for any one reading, the pressure drop across the baghouse identified as BH1 is outside the normal range of 7.0 and 14.0 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 or Exceedances. A pressure reading that is outside the above mentioned ranges 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.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this proposed permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Response to Excursions or Exceedances shall be initiated. For any failure with corresponding response steps and timetable not described in the Response to Excursions or Exceedances, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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 proposed permit (Section B - Emergency Provisions).

D.1.10 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. 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). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the throughput of granulated lime to the fertilizer production line.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of each scrubber and baghouse stack exhausts. 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).

(c) To document compliance with Conditions D.1.6, the Permittee shall maintain a daily record of the liquid flow rate and the pressure drop as well as the flow rate of scrubbant and make-up water across the two (2) scrubbers, identified as WS1 and WS2 used in conjunction with the one (1) fertilizer production line. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not operate that day).

(d) To document compliance with Conditions D.1.8, the Permittee shall maintain a daily record of the pressure drop across the baghouse used in conjunction with the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not

operate that day).

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour. [326 IAC 6-2-3]

(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 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), the allowable PM emission rate from the one steam heat (1) boiler, shall not exceed 0.6 pounds per million British thermal units heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: The Andersons Inc. Seymour Wholesale Terminal
Source Address: 101 Agrico Lane, Seymour, Indiana 47274
Mailing Address: P.O. Box 119, Maumee, Ohio 43537
FESOP Permit No.: F071-23743-00013

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

Please check what document is being certified:

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

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
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: The Andersons Inc. Seymour Wholesale Terminal
Source Address: 101 Agrico Lane, Seymour, Indiana 47274
Mailing Address: P.O. Box 119, Maumee, Ohio 43537
FESOP Permit No.: F071-23743-00013

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: The Andersons Inc. Seymour Wholesale Terminal
Source Address: 101 Agrico Lane, Seymour, Indiana 47274
Mailing Address: P.O. Box 119, Maumee, Ohio 43537
FESOP Permit No.: F071-23743-00013
Facility: granulated lime fertilizer production line
Parameter: throughput of granulated lime
Limit: 262,800 tons per year

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: The Andersons Inc. Seymour Wholesale Terminal
Source Address: 101 Agrico Lane, Seymour, Indiana 47274
Mailing Address: P.O. Box 119, Maumee, Ohio 43537
FESOP Permit No.: F071-23743-00013

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**The Andersons, Inc. Seymour Wholesale Terminal**
Source Location:	**101 Agrico Lane, Seymour, IN 47274**
County:	**Jackson**
SIC Code:	**5191**
Operation Permit Issuance Date:	**August 8, 2002**
Permit Renewal No.:	**F071-23743-00013**
Permit Reviewer:	**Jeff W. Scull**

On May 11, 2007, the Office of Air Quality (OAQ) had a notice published in the Tribune, Jackson County, Seymour, Indiana, stating that The Andersons, Inc. Seymour Wholesale Terminal had applied for the renewal of the FESOP permit at this granulated lime fertilizer manufacturing facility. 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.

On May 17, 2007, Melissa Farrington, Environmental Health Administrator, The Andersons, Inc. submitted comments on the proposed FESOP renewal. The summary of the comments and corresponding responses are as follows (**bolded** language has been added and language ~~with a line~~ through it has been deleted):

Comment 1

The Andersons, Inc. would like to have a temporary soil remediation project utilizing a Soil Vapor Extraction system added to the insignificant activities of the renewal permit.

Response 1

Upon further review, OAQ has decided to make the following change to the permit:

***

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) One (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour. [326 IAC 6-2-3]

(b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(d) Purge double block and bleed valves.

(e) One (1) liquid fertilizer production process. There are no air emissions of any criteria pollutants from this process.

(f) **One (1) Soil Vapor Extraction system for a soil remediation project.**

(g) Other categories with emissions below insignificant thresholds.

***

IDEM, OAQ prefers that the TSD remain the same as the public notice version. Therefore, no changes will be made to the TSD; however, the following changes are noted in this addendum:

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	429
PM_{10}*	429
SO_2	0.05
VOC	~~0.408~~ **1.098**
CO	6.24
NO_x	7.42

HAPS	**Unrestricted Potential Emissions** (tons/year)
Benzene	0.0002
Dichlorobenzene	0.00009
Formaldehyde	0.005
Hexane	0.133
Toluene	0.0002
Lead	0.00005
Cadmium	0.00008
Chromium	0.0001
Manganese	0.00003
Nickel	0.0002
TOTAL	~~0.139~~ **0.829**

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPS**
One (1) Granulator (EU-01)	60.6	60.6	--	--	--	--	--
One (1) Dryer (EU-02)	29.8	29.8	--	--	--	--	--
One (1) Natural Gas Fired Burner For the Dryer (EU-04)	0.133	0.533	Negligible	0.385	5.89	7.01	0.132
One (1) Screen and Classifying Process of Granulated Lime (EU-05)	less than 7.00	less than 7.00	--	--	--	--	--
Insignificant Activities	2.00	2.00	Negligible	Negligible	0.348	0.414	~~Negligible~~ **0.69**
Total PTE After Issuance	<100*	<100	Negligible	0.408	6.24	7.42	Single less than 10 Total less than 25

Pollutant	Emissions (tons/yr)
PM	<100
PM_{10}	<100
SO_2	0.045
VOC	0.408
CO	6.24
NO_x	7.42
Single HAP	~~0.132~~ **0.532**
Combination HAPs	~~0.140~~ **0.829**

Emission Calculations and Site Diagram as provided by the source:

TABLE 2

POTENTIAL EMISSION ESTIMATES
FORMER CARGILL FERTILIZER FACILITY
SEYMOUR, INDIANA

FORMER UST AREA

Soil Zone

Approximate Depth to Groundwater (ft) =	10
Area (ft^2) =	1,800
Soil Volume (ft^3) =	18,000
Soil Mass (kg) =	907,185
VOC Concentration (mg/kg) =	687
Highest Single HAP Concentration (mg/kg) =	402
Combined HAP Concentration (mg/kg) =	687
VOC Mass in Soil (mg) =	622,939,198
Highest Single HAP Mass in Soil (mg) =	364,688,370
Combined HAP Mass in Soil (mg) =	622,939,198
VOC Mass in Soil (ton) =	0.69
Highest Single HAP Mass in Soil (ton) =	0.40
Combined HAP Mass in Soil (ton) =	0.69
PTE VOC (tpy) =	0.69
PTE Highest Single HAP (tpy) =	0.40
PTE Combined HAPs (tpy) =	0.69

Average concentrations of sampling conducted on 6/22/05 in 5 to 8 ft bgs depth interval from BH-4 through BH-14

benzene	24	mg/kg
ethylbenzene	49	mg/kg
toluene	117	mg/kg
xylenes	268	mg/kg

Groundwater Zone

Volume of Aquifer (ft^3) =	18,000
Pore Volume (30%) (ft^3) =	5,400
Pore Volume (30%) (L) =	152,911
VOC Concentration (mg/L) =	26
Highest Single HAP Concentration (mg/L) =	12
Combined HAPs Concentration (mg/L) =	26
VOC Mass in Groundwater (mg) =	3,945,143
Highest Single HAP Mass in Groundwater (mg) =	1,768,520
Combined HAP Mass in Groundwater (mg) =	3,945,143
VOC Mass in Groundwater (ton) =	4.35E-03
Highest Single HAP Mass in Groundwater (ton) =	1.94E-03
Combined HAP Mass in Groundwater (ton) =	4.35E-03
PTE VOC (tpy) =	4.35E-03
PTE Highest Single HAP (tpy) =	1.94E-03
PTE Combined HAPs (tpy) =	4.35E-03

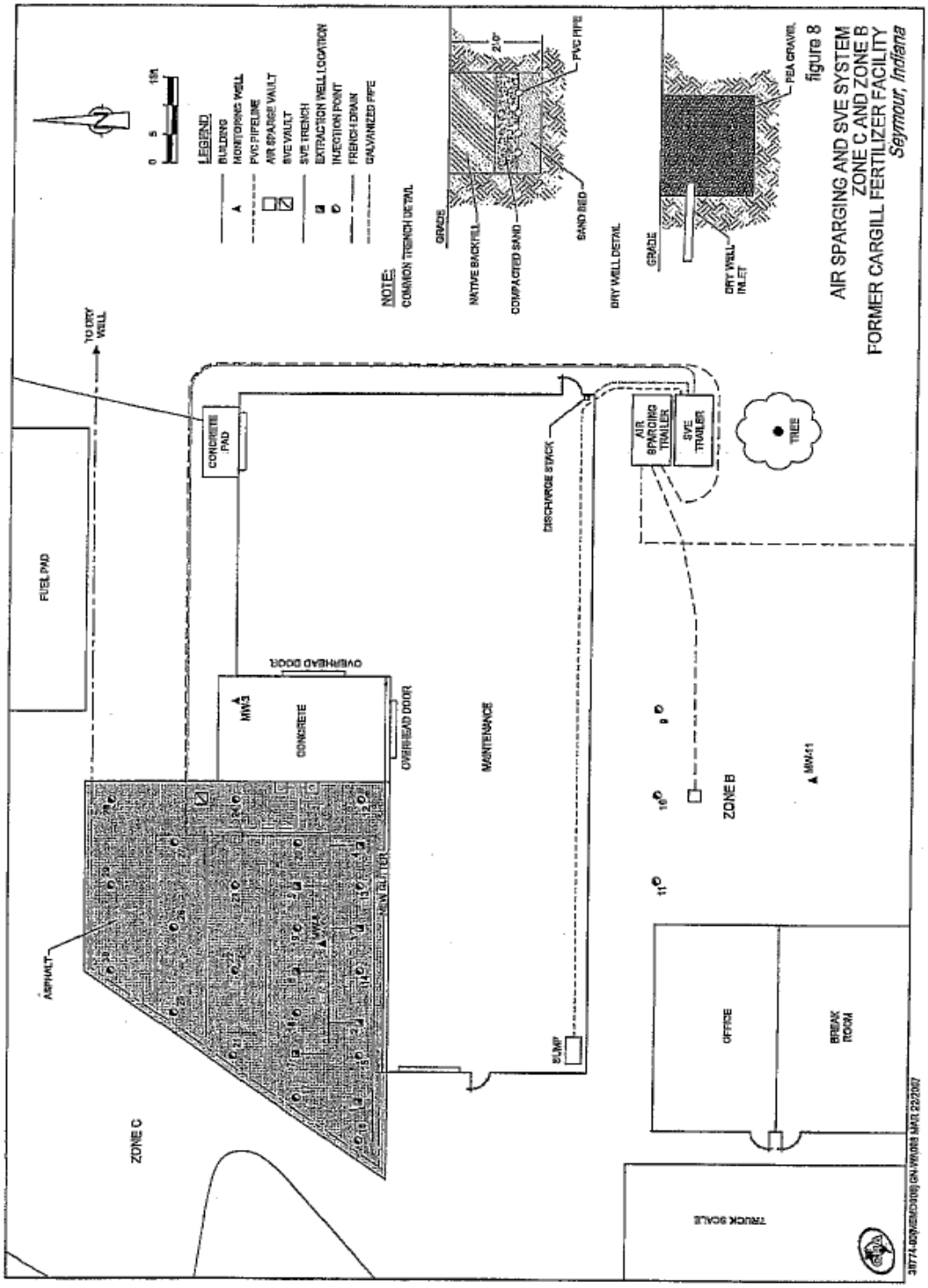
Average concentrations of sampling conducted on 6/21 & 23/05 from BH-1, MW-3, and MW-8

benzene	3.7	mg/L
ethylbenzene	0.9	mg/L
toluene	7.7	mg/L
xylenes	5.0	mg/L

Total PTE VOC (tpy) =	0.69
Total PTE Highest Single HAP (tpy) =	0.40
Total PTE Combined HAPs (tpy) =	0.69

Notes:

* Increased average concentrations by a safety factor of 1.5 to determine PTE. This safety factor should account for any VOCs in addition to BETX in the soil and groundwater.
* Assumed that 100% of the contaminants in the soil and groundwater under the former UST area will emit during the first year of operation.


AIR SPARGING AND SVE SYSTEM
ZONE C AND ZONE B
FORMER CARGILL FERTILIZER FACILITY
Seymour, Indiana
figure 8
LEGEND
BUILDING
MONITORING WELL
PVC PIPELINE
AIR SPARGE VAULT
SVE VAULT
SVE TRENCH
EXTRACTION WELL LOCATION
INJECTION POINT
FRENCH DRAIN
GALVANIZED PIPE
NOTE:
COMMON TRENCH DETAIL
GRADE
NATIVE BACKFILL
COMPACTED SAND
SAND BED
PVC PIPE
DRY WELL DETAIL
PEA GRAVEL
DRY WELL INLET
TO DRY WELL
CONCRETE PAD
DISCHARGE STACK
AIR SPARGING TRAILER
SVE TRAILER
TREE
FUEL PAD
OVERHEAD DOOR
MW3
CONCRETE
MAINTENANCE
ZONE B
MW11
ASPHALT
SUMP
OFFICE
BREAK ROOM
ZONE C
TRUCK SCALE

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**The Andersons, Inc. Seymour Wholesale Terminal**
Source Location:	**101 Agrico Lane, Seymour, Indiana 47274**
County:	**Jackson**
SIC Code:	**2874**
Operating Permit No.:	**F 071-13949-00013**
Operating Permit Issuance Date:	**August 8, 2002**
Permit Renewal No.:	**F 071-23743-00013**
Permit Reviewer:	**Jeff W. Scull**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from The Andersons, Inc. Seymour Wholesale Terminal relating to the operation of a stationary granulated lime fertilizer manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

One (1) fertilizer production line consisting of the following:

(a) One (1) granulator, identified as EU-01, exhausting to Stack S1, equipped with one (1) wet scrubber for particulate control, identified as WS1, capacity: 30 tons per hour of granulated lime. The granulator was installed in 1964-1965. The scrubber was installed in 1993.

(b) One (1) dryer, identified as EU-02, exhausting to Stack S2, equipped with two (2) cyclones, identified as Cycl1 and Cycl1A, and one (1) wet scrubber, identified as WS2, for particulate control, capacity: 30 tons per hour of granulated lime. The dryer was installed in 1964-1965. The cyclones were installed in 1991. The scrubber was installed in 1993.

(c) One (1) natural gas fired burner for the dryer, identified as EU-04, exhausting to Stack S2, rated at 16 million British thermal units per hour. The burner was installed in 1964-1965.

(d) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, exhausting through the general ventilation system, equipped with two (2) cyclones identified as 2A and 2, and one (1) baghouse identified as BH1 for particulate control, capacity: 30 tons per hour of granulated lime. The screening unit was installed in 1964-1965. The cyclones and baghouse were installed in 1991.

(e) One (1) crusher, associated with the screening and classifying process of granulated lime, installed in 2000, capacity: 10 tons per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units or pollution control equipment since the last permit renewal.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour. [326 IAC 6-2-3]

(b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(d) Purge double block and bleed valves.

(e) One (1) liquid fertilizer production process. There are no air emissions of any criteria pollutants from this process.

(f) Other categories with emissions below insignificant thresholds.

Existing Approvals

The source has been operating under the previous FESOP F071-13949-00013 issued on August 8, 2002, with an expiration date of August 8, 2007, and the following amendments and revisions:

(a) Third Administrative Amendment No.: 071-20596-00013 issued on July 1, 2005;

(b) Second Administrative Amendment No.: 071-17473-00013 issued on April 24, 2003;

(c) First Administrative Amendment No.: 071-16641-00013 issued on December 11, 2002.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

The calculations submitted by the applicant for review have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, pages 1 through 5.

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, inclulding 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.”

These tables reflect the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	429
PM_{10}*	429
SO_2	0.05
VOC	0.408
CO	6.24
NO_x	7.42

*PM_{10}, not PM, is used to determine Part 70 applicability.

HAPS	**Unrestricted Potential Emissions** (tons/year)
Benzene	0.0002
Dichlorobenzene	0.00009
Formaldehyde	0.005
Hexane	0.133
Toluene	0.0002
Lead	0.00005
Cadmium	0.00008
Chromium	0.0001
Manganese	0.00003
Nickel	0.0002
TOTAL	0.139

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM_{10} is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPS**
One (1) Granulator (EU-01)	60.6	60.6	--	--	--	--	--
One (1) Dryer (EU-02)	29.8	29.8	--	--	--	--	--
One (1) Natural Gas Fired Burner For the Dryer (EU-04)	0.133	0.533	Negligible	0.385	5.89	7.01	0.132
One (1) Screen and Classifying Process of Granulated Lime (EU-05)	less than 7.00	less than 7.00	--	--	--	--	--
Insignificant Activities	2.00	2.00	Negligible	Negligible	0.348	0.414	Negligible
Total PTE After Issuance	<100*	<100	Negligible	0.408	6.24	7.42	Single less than 10 Total less than 25

*There is no distinction between PM/PM_{10}, therefore, PM is limited to <100 tpy.

County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Jackson 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 for the source section.

(b) Jackson County has been classified as attainment or unclassifiable in Indiana for PM_{10}, SO2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) Jackson County has been classified as attainment or unclassifiable in Indiana 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 PM_{10} emissions as surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability-Entire Source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

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	<100
PM_{10}	<100
SO_2	0.045
VOC	0.408
CO	6.24
NO_x	7.42
Single HAP	0.132
Combination HAPs	0.140

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

(a) The requirements of the New Source Performance Standard 326 IAC 12, (40 CFR Part 60.670 through 60.676, Subpart OOO-Standards of Performance for Nonmetallic Mineral Processing Plants), are not included in the permit for the one (1) screen and classifying process of granulated lime. Even though there is a crusher associated with this process, the capacity of the crusher is less than twenty-five (25) tons per hour.

(b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit for the one (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour, because this boiler was built before the rule applicability date of June 8, 1989, and the maximum heat input capacity is less than ten (10) million British thermal units per hour.

(c) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit for the one (1) natural gas fired burner for the dryer, rated at 16 million British thermal units per hour, identified as EU-04, because this facility is not a source of indirect heating.

(d) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.200, Subpart T- Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants) are not included in the permit for the source, because this source is not a wet process phosphoric acid plant and does not contain any reactors, filters, evaporators or hot wells as described in 40 CFR Part 60.200.

(e) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.210, Subpart U-Standards of Performance for the Phosphate Fertilizer Industry: Superphosphoric Acid Plants) are not included in the permit for the source, because this source is not a superphosphoric acid plant, and does not contain any evaporators, hot wells, acid sumps, or cooling tanks as described in 40 CFR Part 60.210.

(f) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.220, Subpart V-Standards of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plants) are not included in the permit for the source, because this source does not manufacture granular diammonium phosphate. This source manufactures pelletized lime.

(g) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.230, Subpart W-Standards of Performance for the Phosphate Fertilizer Industry: Triple Superphosphate Plants) are not included in the permit for the source, because this source does not manufacture triple superphosphate. This source manufactures pelletized lime.

(h) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.240, Subpart X- Standards of Performance for the Phosphate Fertilizer Industry: Granular Triple Superphosphate Storage Facilities) are not included in the permit for the source, because this source does not contain any triple superphosphate storage facilities. This source manufactures pelletized lime.

(i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included in the permit for this source.

(j) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

(a) The potential to emit PM and PM_{10} from this source was greater than 250 tons per year on August 7, 1977, the date that this rule became effective. Since the source was constructed prior to this date, it was not subject to the requirements of this rule.

(b) The original FESOP did not contain a PM limit that would have made the source minor pursuant to 326 IAC 2-2. Therefore the source remained a major source pursuant to this rule.

(c) FESOP Revision F 071-9124-00013, issued on 7/13/98, was a minor PSD modification to an existing major PSD source because the potential to emit from the revision was less than the PSD Significance levels of twenty-five (25) tons per year for PM and fifteen (15) tons per year for PM_{10}.

(d) This FESOP Renewal contains PM_{10} and PM limits that will limit the entire source to less than major PSD levels. Therefore, this source will be considered a minor PSD source after the issuance of this proposed permit.

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

The operation of the entire source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of this rule.

326 IAC 2-6 (Emission Reporting)

This source is located in Jackson County and the potential to emit of any regulated pollutant is less than one hundred (100) tons per year. This source is not required to have a Title V operating permit, pursuant to 326 IAC 2-7, it is not located in Lake, Porter, or LaPorte counties, and does not emit greater than or equal to five (5) tons per year of lead. Therefore, this rule does not apply.

326 IAC 2-8-4 (FESOP)

Since there is no distinction between PM and PM_{10}, pursuant to this rule, the amount of PM/PM_{10}, shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable to this source.

In order to limit the PM/PM_{10} emissions from the entire source to less than one hundred (100) tons per year the PM/PM_{10} emissions from the granulator (EU-01), and the dryer (EU-02) are each limited to 0.461, and 0.2268 pounds per ton of material processed, respectively, after control. These controlled emissions, combined with the throughput of 262,800 tons per year (30 tons per hour X 8,760 hours per year) results in limited PM/PM_{10} emissions of 60.6, and 29.8 tons per year, respectively for the granulator, and the dryer. These emission limits will assure compliance with the one hundred (100) ton per year PM_{10} limit pursuant to 326 IAC 2-8-4.

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 Part 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.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The one (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3. This limitation is based on the following equation as given in 326 IAC 6-2-3 (Emission limitations for facilities specified in 326 IAC 6-2-1(c)):

$$P_t = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

P_t = Pounds of particulate matter emitted per million British thermal units (lb/MMBTU) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, which ever is specified in the facility permit application, except when some lower capacity is contained in the facility operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

For the one (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour:

$$Pt = \frac{50 \times 0.67 \times 33.0}{76.5 \times (0.945)^{0.75} \times 1^{0.25}} = 15.1 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), PM emissions shall in no case exceed 0.6 pound per million British thermal units heat input.

Based on Appendix A page 3 of 5, the worst case potential to emit PM emissions from the one (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour limited to 0.6 pound PM per million British thermal units is 0.031 tons per year.

0.031 tons/yr x (2000 lbs/ton / 8760 hrs/yr) = 0.007 lb/hr
(0.007 lb/hr / 0.945 MMBtu/hr) = 0.008 lb PM / MMBtu

Therefore, the one (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour will be able to comply with this rule.

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

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the granulator EU-01, the dryer EU-02, and the screen and classifying process EU-05 shall not exceed 40 pounds per hour, each, when operating at a process weight of thirty (30) tons per hour.

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the crusher associated with the screen and classifying process EU-05 shall not exceed 19.2 pounds per hour when operating at a process weight of ten (10) tons per hour.

The pounds per hour limitation was calculated with the following equation:

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:

$E = 4.10\ P^{0.67}$

Where: E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The particulate control equipment shall be in operation at all times the facility is in operation, in order to comply with this limit.

Testing Requirements

There is no testing required at this source. Emission calculations for the fertilizer production line are based on AP-42 emission factors and material throughput.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 approporiate corrective actions within a specific time period.

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

(a) The one (1) granulator, identified as EU-01 has applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the granulator stack exhaust shall be performed once per day during normal daylight operations. A trained employee will 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.

(2) The Permittee shall record the liquid flow rate and the pressure drop as well as the flow rate of scrubbant and make-up water across the scrubber, identified as WS1 used in conjunction with the one (1) fertilizer production line, at least once per day when the granulator is in operation.

(A) When for any one reading, the flow rate of the scrubber is less than the normal minimum of 175 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

(B) When for any one reading, the flow rate of the make-up water is less than the normal minimum of 6.0 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

(C) When for any one reading, the pressure drop across the scrubber, identified as WS1, is outside the normal range of 0.5 to 4.0 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 or Exceedances.

A pressure reading that is outside the above mentioned range or a flow rate that is below the above mentioned minimum 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.

(b) The one (1) dryer, identified as EU-02, has applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the dryer stack exhaust shall be performed once per day during normal daylight operations. A trained employee will 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.

(2) The Permittee shall record the liquid flow rate and the pressure drop as well as the flow rate of scrubbant and make-up water across the scrubber, identified as WS2 used in conjunction with the one (1) dryer, identified as EU-02, at least once per day when the granulator is in operation.

(A) When for any one reading, the flow rate of the scrubber is less than the normal minimum of 175 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

(B) When for any one reading, the flow rate of the make-up water is less than the normal minimum of 6.0 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

(C) When for any one reading, the pressure drop across the scrubber, identified as WS2, is outside the normal range of 7.0 to 13.0 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 or Exceedances.

A pressure reading that is outside the above mentioned range or a flow rate that is below the above mentioned minimum 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.

(3) 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. 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). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(c) The one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, has applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the screen and classifying stack exhaust shall be performed once per day during normal daylight operations. A trained employee will 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.

(2) The Permittee shall record the pressure drop across the baghouse used in conjunction with the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, at least once per day when the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05 is in operation. When for any one reading, the pressure drop across the baghouse identified as BH1 is outside the normal range of 7.0 and 14.0 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 or Exceedances. A pressure reading that is outside the above mentioned ranges 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.

(3) In the event that bag failure has been observed:

(A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this proposed permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Response to Excursions or Exceedances shall be initiated. For any failure with corresponding response steps and timetable not described in the Response to Excursions or Exceedances, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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 proposed permit (Section B - Emergency Provisions).

(5) 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. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this proposed permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

These monitoring conditions are necessary because the control devices for the fertilizer production line must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 administratively complete FESOP renewal application for the purposes of this review was received on October 10, 2006.

Conclusion

The operation of this granulated lime fertillzer manufacturing source shall be subject to the conditions of the FESOP F071-23743-00013.

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

Company Name: The Andersons, Inc. Seymour Wholesale Terminal
Address City IN Zip: 101 Agrico Lane, Seymour, Indiana 47274
Permit Number: F 071-23743-00013
Plt ID: 071-00013
Reviewer: Jeff W. Scull
Date: 10/10/2006
Emission Unit: EU-04 for the Dryer

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
16.000	140.2

	Pollutant					
	PM*	PM_{10}*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.133	0.533	0.042	7.008	0.385	5.887

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 2 for HAPs emissions calculations.

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

Company Name: The Andersons, Inc. Seymour Wholesale Terminal
Address City IN Zip: 101 Agrico Lane, Seymour, Indiana 47274
Permit Number: F 071-23743-00013
Plt ID: 071-00013
Reviewer: Jeff W. Scull
Date: 10/10/2006
Emission Unit: EU-04 for the Dryer

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.472E-04	8.410E-05	5.256E-03	1.261E-01	2.383E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.504E-05	7.709E-05	9.811E-05	2.663E-05	1.472E-04

Total HAPs Emissions: 1.323E-01

Methodology is the same as page 1.

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

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

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Address City IN Zip: 101 Agrico Lane, Seymour, Indiana 47274
Permit Number: F 071-23743-00013
Plt ID: 071-00013
Reviewer: Jeff W. Scull
Date: 10/10/2006
Emission Unit: Insignificant Steam Boiler Unit

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.945	8.278

	Pollutant					
	PM*	PM_{10}*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.008	0.031	0.002	0.414	0.023	0.348

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 4 for HAPs emissions calculations.

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

Company Name: The Andersons, Inc. Seymour Wholesale Terminal
Address City IN Zip: 101 Agrico Lane, Seymour, Indiana 47274
Permit Number: F 071-23743-00013
Plt ID: 071-00013
Reviewer: Jeff W. Scull
Date: 10/10/2006
Emission Unit: Insignificant Steam Boiler Unit

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	8.692E-06	4.967E-06	3.104E-04	7.450E-03	1.407E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.070E-06	4.553E-06	5.795E-06	1.573E-06	8.692E-06

Total HAPs Emissions: 7.811E-03

Methodology is the same as page 3.

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

Appendix A: Emissions Calculations
Particulate Matter Emissions
Fertilizer production operations

Company Name: The Andersons, Inc. Seymour Wholesale Terminal
Address City IN Zip: 101 Agrico Lane, Seymour, Indiana 47274
Permit Number: F 071-23743-00013
Plt ID: 071-00013
Reviewer: Jeff W. Scull
Date: 10/10/2006
Emission Units: EU-01, EU-02, EU-05, & Crusher Ops

Emission Unit	Emission Factor (lbs/ton)	Process Weight (tons/hour)	Efficiency	Uncontrolled Emission Rate (lbs/hr)	Controlled Emission Rate (lbs/hr)	Potential Emissions (tons/yr) before controls	Potential Emissions (tons/yr) after controls
EU-01	1.52	30	93.5%	45.6	2.964	199.73	12.98
EU-02	1.5	30	93.5%	45	2.925	197.10	12.81
EU-05	0.06	30	99.9%	1.8	0.0018	7.88	0.01
Crushing Operation*	0.017	10	0.0%	0.17	0.17	0.74	0.74

Emission Factors for EU-01, EU-02, EU-05 are from AP-42 section 8.5.3.3 and Table 8.5.3-1

Emission Factors for the Crushing Operation are from the Emission Factor Documentation for AP-42,Table 4.3

* Note: Crushing operation emissions are uncontrolled, therefore Emission Rate and Potential Emissions before and after controls are the same.