



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 12, 2010

RE: The Andersons, Inc. – Delphi Grain Operations / 015-28946-00026

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/03/07



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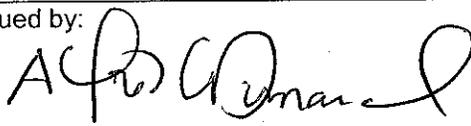
**Minor Source Operating Permit Renewal  
OFFICE OF AIR QUALITY**

**The Andersons, Inc. - Delphi Grain Operations  
3854 N Anderson Dr  
Delphi, Indiana 46923**

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

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

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

Operation Permit No.: M015-28946-00026	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 12, 2010  Expiration Date: August 12, 2020

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary grain storage and handling for corn, soybeans, and wheat.

Source Address:	3854 N Anderson Dr, Delphi, Indiana 46923
General Source Phone Number:	419-891-2915
SIC Code:	5153
County Location:	Carroll
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset 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

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) grain receiving stations (trucks), identified as GR1 and GR2, constructed in 1975, each with a maximum capacity of 25,000 bushels of grain per hour each, with emissions controlled by two (2) baghouses (TD-1 and TD-2), a three-sided enclosure and limited drop height, and exhausting to stacks 1 and 2.
- (b) One (1) grain receiving station (railcar), identified as GR3, constructed in 1975, with a maximum capacity of 14,000 bushels of grain per hour.
- (c) One grain handling system, consisting of totally enclosed legs, conveyors and cleaners, identified as GH, constructed in 1975, with a maximum capacity of 50,000 bushels of grain per hour, with emissions controlled by six (6) baghouses (CL-1, CL-2, CL-3, C-10, L-3 and L-11), and exhausting to stacks 3, 4, 5, 6, 7, and 8, respectively.
- (d) One (1) Zimmerman column grain dryer, identified as GD, constructed in 1996, with a maximum capacity of 6,000 bushels of grain/beans per hour, with dryer burners having a maximum capacity of 39.5 MMBtu/hour of natural gas, and using perforation plate screens (0.0625 inch – 0.078 inch plate perforation diameter) for particulate control.  
  
Under the NSPS for Grain Elevators (40 CFR 60.300, Subpart DD), the one (1) Zimmerman column grain dryer, identified as GD, is considered an affected facility.
- (e) One (1) concrete storage silo complex, identified as S1, constructed in 1975, with a maximum storage capacity of 1,000,000 bushels.
- (f) Storage Bins, with a total maximum storage capacity of 3,125,000 bushels, with emissions controlled by baghouses CL-1, CL-2, CL-3, C-10, L-3 and L-11, and exhausting to stacks 3, 4, 5, 6, 7, and 8, respectively:

- (1) Five (5) steel storage bins, identified as S2, S3, S4, S5, and S6 constructed in 1975, with a combined maximum storage capacity of 2,375,000 bushel, and
- (2) One (1) steel storage bin, identified as S9, constructed in 2009, with a maximum storage capacity 750,000,
- (g) Two (2) temporary storage piles, identified as S7 and S8, constructed in 1975, with a combined maximum storage capacity of 3,300,000 bushels. Piles are covered with tarpaulins for emissions control.
- (h) Three (3) grain shipping stations (truck), identified as GS1, GS2 and GS3, constructed in 1975, with a maximum capacity of 12,000 bushels of grain per hour each, with emissions controlled by telescoping spout.
- (i) One (1) grain shipping station (railcar), identified as GS4, constructed in 1975, with a maximum capacity of 50,000 bushels of grain per hour, with emissions controlled by telescoping spout and two (2) baghouses at scale level, identified as BH1 and BH2, and exhausting to stack 9.
- (j) Paved and unpaved roads and parking lots with public access.

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, M015-28946-00026, is issued for a fixed term of ten (10) 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]

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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

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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

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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

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

### B.7 Duty to Provide Information

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M015-28946-00026 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.12 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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  
Permit Administration and Support Section, 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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

Indiana Department of Environmental Management  
Permit Administration and Support Section, 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 an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Stack Height [326 IAC 1-7]

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

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- (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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 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.

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

#### **Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

##### **C.10 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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.11 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

### **C.12 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### **C.13 Instrument Specifications [326 IAC 2-1.1-11]**

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- (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**

### **C.14 Response to Excursions or Exceedances**

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

**C.16 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) grain receiving stations (trucks), identified as GR1 and GR2, constructed in 1975, each with a maximum capacity of 25,000 bushels of grain per hour each, with emissions controlled by two (2) baghouses (TD-1 and TD-2), a three-sided enclosure and limited drop height, and exhausting to stacks 1 and 2.
- (b) One (1) grain receiving station (railcar), identified as GR3, constructed in 1975, with a maximum capacity of 14,000 bushels of grain per hour.
- (c) One grain handling system, consisting of totally enclosed legs, conveyors and cleaners, identified as GH, constructed in 1975, with a maximum capacity of 50,000 bushels of grain per hour, with emissions controlled by six (6) baghouses (CL-1, CL-2, CL-3, C-10, L-3 and L-11), and exhausting to stacks 3, 4, 5, 6, 7, and 8, respectively.
- (d) One (1) Zimmerman column grain dryer, identified as GD, constructed in 1996, with a maximum capacity of 6,000 bushels of grain/beans per hour, with dryer burners having a maximum capacity of 39.5 MMBtu/hour of natural gas, and using perforation plate screens (0.0625 inch – 0.078 inch plate perforation diameter) for particulate control.  
  
Under the NSPS for Grain Elevators (40 CFR 60.300, Subpart DD), the one (1) Zimmerman column grain dryer, identified as GD, is considered an affected facility.
- (e) One (1) concrete storage silo complex, identified as S1, constructed in 1975, with a maximum storage capacity of 1,000,000 bushels.
- (f) Storage Bins, with a total maximum storage capacity of 3,125,000 bushels, with emissions controlled by baghouses CL-1, CL-2, CL-3, C-10, L-3 and L-11, and exhausting to stacks 3, 4, 5, 6, 7, and 8, respectively:
  - (1) Five (5) steel storage bins, identified as S2, S3, S4, S5, and S6 constructed in 1975, with a combined maximum storage capacity of 2,375,000 bushel, and
  - (2) One (1) steel storage bin, identified as S9, constructed in 2009, with a maximum storage capacity 750,000,
- (g) Two (2) temporary storage piles, identified as S7 and S8, constructed in 1975, with a combined maximum storage capacity of 3,300,000 bushels. Piles are covered with tarpaulins for emissions control.
- (h) Three (3) grain shipping stations (truck), identified as GS1, GS2 and GS3, constructed in 1975, with a maximum capacity of 12,000 bushels of grain per hour each, with emissions controlled by telescoping spout.
- (i) One (1) grain shipping station (railcar), identified as GS4, constructed in 1975, with a maximum capacity of 50,000 bushels of grain per hour, with emissions controlled by telescoping spout and two (2) baghouses at scale level, identified as BH1 and BH2, and exhausting to stack 9.

(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 2-6.1-5(a)(1)]**

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

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

<b>Emissions Unit Description</b>	<b>Process Weight Rate (bushels/hr)</b>	<b>Process Weight Rate (tons/hr)*</b>	<b>Allowable Particulate Emissions (lbs/hour)</b>
Grain Unloading/Receiving (GR1, GR2)	50,000	1,450	82.49
Grain Receiving - Railcar (GR3)	14,000	406	66.49
Internal Handling (GH)	50,000	1,450	82.49
Grain Cleaning (GH)	50,000	1,450	82.49
Grain Drying (GD)	6,000	174	57.01
Grain Storage Silos and Bins (S1, S2, S3, S4, S5, S6, S7, S8, S9)	50,000	1,450	82.49
Grain Loading/Shipping - Truck (GS1, GS2, GS3)	12,000	348	64.70
Grain Loading/Shipping - Railcar (GS4)	50,000	1,450	82.49

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where}$$

E = rate of emission in pounds per hour, and  
 P = process weight rate in tons per hour.

**D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]**

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

**D.1.3 Particulate Control**

- (a) In order to comply with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from the grain receiving facilities (baghouses TD-1 and TD-2), internal handling, grain cleaning, and grain storage facilities (baghouses CL-1, CL-2, CL-3, C-10, L-3 and L-11), and grain shipping facilities (baghouses BH1 and BH2) at all times that the grain receiving, internal handling, grain cleaning, grain storage, and grain shipping facilities are in operation.
- (b) In order to comply with D.1.1, the perforation plate for particulate control shall be in operation and control emissions from the grain drying facility at all times that the grain drying facility is in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also

include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.1.4 Visible Emissions Notations**

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- (a) Visible emission notations of the grain receiving, internal handling, grain cleaning, grain storage, and grain shipping facilities stack exhausts; and the grain dryer vent, 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. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### **D.1.5 Parametric Monitoring**

---

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the grain receiving facilities (baghouses TD-1 and TD-2), internal handling, grain cleaning, and grain storage facilities (baghouses CL-1, CL-2, CL-3, C-10, L-3, L-11), and the grain shipping facilities (baghouse BH1 and BH2), at least once per day when the grain receiving, internal handling, grain cleaning, and grain shipping facilities are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) 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 or replaced at least once every six (6) months.

#### **D.1.6 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.

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

## **Record Keeping Requirement**

### **D.1.7 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records once per day of visible emission notations of the grain receiving, internal handling, grain cleaning, grain storage, and grain shipping facilities baghouse stack exhausts, and the grain dryer vent. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain records once per day of the total static pressure drop during normal operation.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION E.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (d) One (1) Zimmerman column grain dryer, identified as GD, constructed in 1996, with a maximum capacity of 6,000 bushels of grain/beans per hour, with dryer burners having a maximum capacity of 39.5 MMBtu/hour of natural gas, and using perforation plate screens (0.0625 inch – 0.078 inch plate perforation diameter) for particulate control.

Under the NSPS for Grain Elevators (40 CFR 60.300, Subpart DD), the one (1) Zimmerman column grain dryer, identified as GD, is considered an affected facility.

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

### New Source Performance Standards (NSPS) Requirements [326 IAC 12]

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

The Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, except when otherwise specified in 40 CFR Part 60, Subpart DD (included as Attachment A of this permit).

#### E.1.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12][40 CFR Part 60, Subpart DD]

The Permittee, which operates grain storage and handling for corn, soybeans, and wheat, shall comply with the following provisions of 40 CFR Part 60, Subpart DD (included as Attachment A of this permit):

- (1) 40 CFR 60.300
- (2) 40 CFR 60.301
- (3) 40 CFR 60.304

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	The Andersons, Inc. - Delphi Grain Operations
<b>Address:</b>	3854 N Anderson Dr
<b>City:</b>	Delphi, Indiana 46923
<b>Phone #:</b>	419-891-2915
<b>MSOP #:</b>	M015-28946-00026

I hereby certify that The Andersons, Inc. - Delphi Grain Operations is :

still in operation.

I hereby certify that The Andersons, Inc. - Delphi Grain Operations is :

no longer in operation.

in compliance with the requirements of MSOP M015-28946-00026.

not in compliance with the requirements of MSOP M015-28946-00026.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FAX NUMBER: (317) 233-6865**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Attachment A: NSPS  
40 CFR 60.300, Subpart DD**

**The Andersons, Inc. - Delphi Grain Operations  
3845 N Anderson Dr  
Delphi, IN 46923**

**Permit No. M015-28946-00026**

**Title 40: Protection of Environment**

**PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES**

**Subpart DD—Standards of Performance for Grain Elevators**

**Source:** 43 FR 34347, Aug. 3, 1978, unless otherwise noted.

**§ 60.300 Applicability and designation of affected facility.**

(a) The provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under §60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.

(b) Any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after August 3, 1978, is subject to the requirements of this part.

[43 FR 34347, Aug. 3, 1978, as amended at 52 FR 42434, Nov. 5, 1988]

**§ 60.301 Definitions.**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) *Grain* means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.

(b) *Grain elevator* means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.

(c) *Grain terminal elevator* means any grain elevator which has a permanent storage capacity of more than 88,100 m<sup>3</sup> (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

(d) *Permanent storage capacity* means grain storage capacity which is inside a building, bin, or silo.

(e) *Railcar* means railroad hopper car or boxcar.

(f) *Grain storage elevator* means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m<sup>3</sup> (ca. 1 million bushels).

(g) *Process emission* means the particulate matter which is collected by a capture system.

(h) *Fugitive emission* means the particulate matter which is not collected by a capture system and is released directly into the atmosphere from an affected facility at a grain elevator.

(i) *Capture system* means the equipment such as sheds, hoods, ducts, fans, dampers, etc. used to collect particulate matter generated by an affected facility at a grain elevator.

(j) *Grain unloading station* means that portion of a grain elevator where the grain is transferred from a truck, railcar, barge, or ship to a receiving hopper.

(k) *Grain loading station* means that portion of a grain elevator where the grain is transferred from the elevator to a truck, railcar, barge, or ship.

(l) *Grain handling operations* include bucket elevators or legs (excluding legs used to unload barges or ships), scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse and other such structures.

(m) *Column dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in one or more continuous packed columns between two perforated metal sheets.

(n) *Rack dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in a cascading flow around rows of baffles (racks).

(o) *Unloading leg* means a device which includes a bucket-type elevator which is used to remove grain from a barge or ship.

[43 FR 34347, Aug. 3, 1978, as amended at 65 FR 61759, Oct. 17, 2000]

**§ 60.302 Standard for particulate matter.**

(a) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:

- (1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
- (2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.

(b) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

- (1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
- (2) Exhibits greater than 0 percent opacity.

(c) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

- (1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
- (2) Any grain handling operation which exhibits greater than 0 percent opacity.
- (3) Any truck loading station which exhibits greater than 10 percent opacity.
- (4) Any barge or ship loading station which exhibits greater than 20 percent opacity.

(d) The owner or operator of any barge or ship unloading station shall operate as follows:

(1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.

(2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft<sup>3</sup> /bu).

(3) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

### **§ 60.303 Test methods and procedures.**

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

(b) The owner or operator shall determine compliance with the particulate matter standards in §60.302 as follows:

(1) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.

(2) Method 2 shall be used to determine the ventilation volumetric flow rate.

(3) Method 9 and the procedures in §60.11 shall be used to determine opacity.

(c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) For Method 5, Method 17 may be used.

[54 FR 6674, Feb. 14, 1989]

### **§ 60.304 Modifications.**

(a) The factor 6.5 shall be used in place of "annual asset guidelines repair allowance percentage," to determine whether a capital expenditure as defined by §60.2 has been made to an existing facility.

(b) The following physical changes or changes in the method of operation shall not by themselves be considered a modification of any existing facility:

(1) The addition of gravity loadout spouts to existing grain storage or grain transfer bins.

(2) The installation of automatic grain weighing scales.

(3) Replacement of motor and drive units driving existing grain handling equipment.

(4) The installation of permanent storage capacity with no increase in hourly grain handling capacity.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>The Andersons, Inc. - Delphi Grain Operations</b>
<b>Source Location:</b>	<b>3845 N Anderson Dr, Delphi, IN 46923</b>
<b>County:</b>	<b>Carroll</b>
<b>SIC Code:</b>	<b>5153</b>
<b>Permit Renewal No.:</b>	<b>M015-28946-00026</b>
<b>Permit Reviewer:</b>	<b>Christine L. Filutze</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from The Andersons, Inc. - Delphi Grain Operations relating to the operation of grain storage and handling for corn, soybeans, and wheat.

**History**

On February 5, 2010, The Andersons, Inc. - Delphi Grain Operations submitted an application to the OAQ requesting to renew its operating permit. The Andersons, Inc. - Delphi Grain Operations was issued MSOP No. M015-20598-00026 on July 26, 2005.

**Permitted Emission Units and Pollution Control Equipment**

- (a) Two (2) grain receiving stations (trucks), identified as GR1 and GR2, constructed in 1975, each with a maximum capacity of 25,000 bushels of grain per hour, with emissions controlled by two (2) baghouses (TD-1 and TD-2), a three-sided enclosure and limited drop height, and exhausting to stacks 1 and 2.
- (b) One (1) grain receiving station (railcar), identified as GR3, constructed in 1975, with a maximum capacity of 14,000 bushels of grain per hour.
- (c) One grain handling system, consisting of totally enclosed legs, conveyors and cleaners, identified as GH, constructed in 1975, with a maximum capacity of 50,000 bushels of grain per hour, with emissions controlled by six (6) baghouses (CL-1, CL-2, CL-3, C-10, L-3 and L-11), and exhausting to stacks 3, 4, 5, 6, 7, and 8, respectively.
- (d) One (1) Zimmerman column grain dryer, identified as GD, constructed in 1996, with a maximum capacity of 6,000 bushels of grain/beans per hour, with dryer burners having a maximum capacity of 39.5 MMBtu/hour of natural gas, and using perforation plate screens (0.0625 inch – 0.078 inch plate perforation diameter) for particulate control.  
  
Under the NSPS for Grain Elevators (40 CFR 60.300, Subpart DD), the one (1) Zimmerman column grain dryer, identified as GD, is considered an affected facility.
- (e) One (1) concrete storage silo complex, identified as S1, constructed in 1975, with a maximum storage capacity of 1,000,000 bushels.
- (f) Storage Bins, with a total maximum storage capacity of 3,125,000 bushels, with emissions controlled by baghouses CL-1, CL-2, CL-3, C-10, L-3 and L-11, and exhausting to stacks 3, 4, 5, 6, 7, and 8, respectively:

- (1) Five (5) steel storage bins, identified as S2, S3, S4, S5, and S6 constructed in 1975, with a combined maximum storage capacity of 2,375,000 bushel, and
- (2) One (1) steel storage bin, identified as S9, constructed in 2009, with a maximum storage capacity 750,000,
- (g) Two (2) temporary storage piles, identified as S7 and S8, constructed in 1975, with a combined maximum storage capacity of 3,300,000 bushels. Piles are covered with tarpaulins for emissions control.
- (h) Three (3) grain shipping stations (truck), identified as GS1, GS2 and GS3, constructed in 1975, with a maximum capacity of 12,000 bushels of grain per hour each, with emissions controlled by telescoping spout.
- (i) One (1) grain shipping station (railcar), identified as GS4, constructed in 1975, with a maximum capacity of 50,000 bushels of grain per hour, with emissions controlled by telescoping spout and two (2) baghouses at scale level, identified as BH1 and BH2, and exhausting to stack 9.
- (j) Paved and unpaved roads and parking lots with public access.

### Existing Approvals

Since the issuance of the MSOP No. M015-20598-00026, issued on July 26, 2005, the source has not been operating under any other approvals.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

IDEM, OAQ has decided to make additional revisions to the permit, for clarification purposes, as follows:

- (a) Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch".
- (b) For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligations with regard to the records required by this condition."
- (c) IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than" except when the underlying rule states "within."
- (d) IDEM has decided to clarify throughout the permit that a certification needs to meet the requirements of 326 IAC 2-8-5(a)(1). In addition, IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already addresses this issue.
- (e) IDEM has decided to clarify the certification requirements in Section B - Duty to Provide Information and Section B - Certification.

- (f) IDEM has decided to clarify the requirements of Section B – Preventive Maintenance Plan and to add a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans.
- (g) IDEM has revised Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
- (h) IDEM has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviation form Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.
- (i) IDEM has revised Section B - Permit Renewal paragraph (c) to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.
- (j) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (k) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
- (l) IDEM has revised the language of the Section C - Asbestos Abatement Projects to change the terminology "Accredited" to "Licensed" in order to match the rule.
- (m) IDEM has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (n) IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been change to clearly indicate that it is the Permittee that must follow the requirements of the condition
- (o) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (p) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

- (q) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (r) Paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
- (s) IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
- (t) The word "status" has been added to Section D - Record Keeping Requirements and Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- (u) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

#### Enforcement Issue

There are no enforcement actions pending.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

#### County Attainment Status

The source is located in Carroll County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

- (a) Ozone Standards
  - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Carroll County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Carroll County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
Carroll County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	225.18
PM <sub>10</sub> <sup>(1)</sup>	64.24
PM <sub>2.5</sub>	64.24
SO <sub>2</sub>	0.10
NO <sub>x</sub>	17.31
VOC	0.95
CO	14.54
Total HAPs	0.33
Single Highest HAP	0.31 (Hexane)

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant."

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated air pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### **Federal Rule Applicability**

The following federal rules are applicable to the source:

- (a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60.300, Subpart DD, are not included in the permit for facilities located at the source that were constructed prior to August 3, 1978, that consist of truck unloading station, truck loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.
- (b) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60.300, Subpart DD, are not included in the permit for the one (1) steel storage bin, S7, which was constructed after August 3, 1978, since it has a permanent storage capacity which is less than 2.5 million bushels [40 CFR 60.300(a)][40 CFR 60.301(c)].
- (c) One (1) six-thousand (6,000) bushel per hour column grain dryer, identified as GD, is subject to the New Source Performance Standard for Grain Elevators (40 CFR 60.300, Subpart DD), which is incorporated by reference as 326 IAC 12, because the grain dryer, GD, is an affected facility, at a grain terminal elevator, that has a permanent storage capacity greater than 2.5 million bushels and was constructed after August 3, 1978.

However, pursuant to 40 CFR 60.302(a)(1), since the column grain dryer, GD, does not have a column plate perforation exceeding 0.094 inches, it is not subject to the opacity standard contained in 40 CFR 60.302(a).

The column grain dryer, GD, is subject to the following portions of Subpart DD:

- |     |               |
|-----|---------------|
| (1) | 40 CFR 60.300 |
| (2) | 40 CFR 60.301 |
| (3) | 40 CFR 60.304 |
- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

### **State Rule Applicability - Entire Source**

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

The operation of this 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, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte

County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

**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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

**326 IAC 6-4 (Fugitive Dust Emissions Limitations)**

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

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

The source is subject to the requirements of 326 IAC 6-5, because combined potential fugitive emissions from the paved roads and parking lots are greater than 25 tons per year.

**State Rule Applicability – Individual Facilities**

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

The one (1) column grain dryer, GD, is not subject to the requirements of 326 IAC 6-2, because it is not a source of indirect heating.

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

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

<b>Emissions Unit Description</b>	<b>Process Weight Rate (bushels/hr)</b>	<b>Process Weight Rate (tons/hr)*</b>	<b>Allowable Particulate Emissions (lbs/hour)</b>
Grain Unloading/Receiving (GR1, GR2)	50,000	1,450	82.49
Grain Receiving - Railcar (GR3)	14,000	460	66.49
Internal Handling (GH)	50,000	1,450	82.49
Grain Cleaning (GH)	50,000	1,450	82.49
Grain Drying (GD)	6,000	174	57.01
Grain Storage Silos and Bins (S1, S2, S3, S4, S5, S6, S7, S8, S9)	50,000	1,450	82.49
Grain Loading/Shipping - Truck (GS1, GS2, GS3)	12,000	348	64.70
Grain Loading/Shipping - Railcar (GS4)	50,000	1,450	82.49

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

$E = 55.0 P^{0.11} - 40$  where E = rate of emission in pounds per hour and  
 P = process weight rate in tons per hour.

- (a) The baghouses shall be in operation at all times the grain receiving, internal handling, grain cleaning, grain storage and grain shipping facilities are in operation, in order to comply with this limit; and
- (b) The perforation plate shall be in operation at all times the grain drying facility is in operation, in order to comply with this limit.

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

**Compliance Determination and Monitoring Requirements**

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouses: TD-1, TD-2, CL-1, CL-2, CL-3, CL-10, L-3, L-11, BH1, BH2	Water Pressure Drop	Daily	3.0 to 6.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	

**Recommendation**

The staff recommends to the Commissioner that the MSOP Renewal M015-28946-00026 be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 5, 2010. Additional information was received on February 24, 2010, April 19, 2010, and April 26, 2010.

**Conclusion**

The operation of this grain storage and handling for corn, soybeans, and wheat, shall be subject to the conditions of the attached MSOP Renewal No. M015-28946-00026.

**Appendix A: Emissions Calculations  
Potential to Emit - Summary**

**Company Name:** The Andersons, Inc. - Delphi Grain Operations  
**Address:** 3854 N Anderson Dr, Delphi, Indiana 46923  
**Permit No.:** M015-28946-00026  
**Permit Reviewer:** Christine L. Filutze  
**Date:** June 29, 2010

**Potential to Emit (tons/yr) - Unrestricted (no controls)**

<b>Emission Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>	<b>Single Highest HAP</b>
Grain Operations (GH, GR1 thru GR3, GS1 thru GS4)	176.50	50.85	50.85	0.00	0.00	0.00	0.00	0.00	0.31 (Hexane)
Dryer (GD)	1.32	1.32	1.32	0.10	17.31	0.95	14.54	0.33	
Storage Piles - fugitive (S1 thru S9)	0.91	0.32	0.32	0.00	0.00	0.00	0.00	0.00	
Paved Roads - fugitive	1.36	0.26	0.26	0.00	0.00	0.00	0.00	0.00	
Unpaved Roads - fugitive	45.10	11.49	11.49	0.00	0.00	0.00	0.00	0.00	
<b>Total Less Fugitives:</b>	<b>177.81</b>	<b>52.16</b>	<b>52.16</b>	<b>0.10</b>	<b>17.31</b>	<b>0.95</b>	<b>14.54</b>	<b>0.33</b>	
<b>Total With Fugitives:</b>	<b>225.18</b>	<b>64.24</b>	<b>64.24</b>	<b>0.10</b>	<b>17.31</b>	<b>0.95</b>	<b>14.54</b>	<b>0.33</b>	

**Potential to Emit (tons/yr) - After Controls**

Although controls are not necessary for a Minor Source Operating Permit (MSOP), the source does have controls in place, and the potential emissions (tons/yr) after controls are:

<b>Emission Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>	<b>Single Highest HAP</b>
Grain Operations	6.95	1.90	1.90	0.00	0.00	0.00	0.00	0.00	0.31 (Hexane)
Dryer	1.32	1.32	1.32	0.10	17.31	0.95	14.54	0.33	
Storage Piles (fugitive*)	0.05	0.02	0.02	0.00	0.00	0.00	0.00	0.00	
Paved Roads (fugitive*)	1.36	0.26	0.26	0.00	0.00	0.00	0.00	0.00	
Unpaved Roads (fugitive*)	45.10	11.49	11.49	0.00	0.00	0.00	0.00	0.00	
<b>Totals:</b>	<b>54.76</b>	<b>14.99</b>	<b>14.99</b>	<b>0.10</b>	<b>17.31</b>	<b>0.95</b>	<b>14.54</b>	<b>0.33</b>	

**Appendix A: Emissions Calculations**  
**PM and PM10 Emissions From the Grain Handling, Storage and Drying Processes**

**Company Name:** The Andersons, Inc. - Delphi Grain Operations  
**Address:** 3854 N Anderson Dr, Delphi, Indiana 46923  
**Permit No.:** M015-28946-00026  
**Permit Reviewer:** Christine L. Filutze  
**Date:** June 29, 2010

**1. Maximum Throughput Calculation**

Pursuant to an EPA guidance memo (November 14, 1995), "the highest amount of grain received during the previous 5 years, multiplied times an adjustment factor of 1.2, will constitute a realistic upper bound on the amount of grain a country elevator could receive."

Year	Grain Received		Maximum Throughput	
	(bushels/yr)	(tons/yr)	(bushels/yr)	(tons/yr)
2005	15,231,003	441,699	18,444,396	534,887
2006	15,214,800	441,229		
2007	15,370,330	445,740		
2008	14,583,915	422,934		
2009	14,109,991	409,190		

**2. PTE Calculations**

Emissions Unit Description	Maximum Grain Throughput (bushels/year)	Maximum Grain Throughput (tons/year)	PM/PM2.5 Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	Control Devices	Collection and Control Efficiency (%)	PTE of PM Before Control (tons/yr)	PTE of PM10/PM2.5* Before Control (tons/yr)	PTE of PM After Control (tons/yr)	PTE of PM10/PM2.5* After Control (tons/yr)
Receiving - Straight Truck (GR1, GR2)	8,329,489	241,555	0.18	0.059	Baghouses TD-1, TD-2	90%	21.7	7.13	2.17	0.71
Receiving - Hopper Truck (GR1, GR2)	10,114,907	293,332	0.035	0.0078			5.13	1.14	0.51	0.11
Receiving - Railcar (GR3)	60,000	1,740	0.032	0.0078	NA	0%	0.03	0.01	0.03	0.01
Shipping - Truck (GS1, GS2, GS3)	595,754	17,277	0.086	0.029	NA	0%	0.74	0.25	0.74	0.25
Shipping - Railcar (GS4)	17,848,642	517,611	0.027	0.0022	Baghouses BH1, BH2, CL-1, CL-2, CL-3, C-10, L-3, L-11	90%	6.99	0.57	0.70	0.06
Cleaning - 5% of total grain	9,000,000	261,000	0.75	0.1875		99%	97.9	24.47	0.98	0.24
Internal Handling (GH)	23,055,495	668,609	0.061	0.034	NA	99%	20.4	11.37	0.20	0.11
Storage - Silos and Bins (S1 thru S9)	23,055,495	668,609	0.025	0.0063	NA	99%	8.36	2.11	0.08	0.02
Drying - Column Dryer (GD)	4,777,099	138,536	0.22	0.055	Perforation Plate	90%	15.2	3.81	1.52	0.38
<b>Totals</b>							<b>176.5</b>	<b>50.8</b>	<b>6.95</b>	<b>1.90</b>

\*Assume PM10 = PM2.5

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)  
 Note: Source reports that 97% of grain is shipped by rail, 26% of grain is dried, 5% of grain is cleaned.

**Methodology**

Maximum Grain Throughput (bushels/year) = 1.2 x Highest Yearly Throughput in Past Five Years (16,000,000 bushels) (EPA Guidance Memo 11/14/95)

Maximum Grain Throughput (tons/year) = Maximum Grain Throughput (bushels/year) x 58 (lbs/bushel) x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs

PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

INCREASED INTERNAL HANDLING TO HIGHEST YEAR IN LAST FIVE TIMES 1.5 FACTOR (RATHER THAN 1.2)  
 INCREASED GRAIN CLEANED TO REFLECT 2009 EXPERIENCE WHEN MOST OF CORN SHIPPED BY RAIL WAS CLEANED  
 CORRECTED CONTROL DEVICES -- CLEANING AND SHIPPING ARE LINKED, INTERNAL HANDLING AND STORAGE CONTROLLED THROUGH ENCLOSURE AND NEGATIVE PRESSURE RATHER THAN BAGHOUSES

**Appendix A: Emissions Calculations**  
**PM and PM10 Emissions From the Grain Handling, Storage and Drying Processes**

**Company Name:** The Andersons, Inc. - Delphi Grain Operations  
**Address:** 3854 N Anderson Dr, Delphi, Indiana 46923  
**Permit No.:** M015-28946-00026  
**Permit Reviewer:** Christine L. Filutze  
**Date:** June 29, 2010

**Allowable Emissions Under 326 IAC 6-3-2**

Emissions Unit Description	Maximum Grain Throughput (bushels/hr)	Maximum Grain Throughput (tons/hr)	PM Emission Factor (lbs/ton)	PM10* Emission Factor (lbs/ton)	Control Devices	Collection & Control Efficiency (%)	PM Before Controls (lbs/hr)	PM10/PM2.5* Before Controls (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM After Controls (lbs/hr)	PM10/PM2.5* After Controls (lbs/hr)
Grain Unloading/Receiving - Truck (GR1, GR2)	50,000	1,450	0.18	0.059	Baghouses TD-1, TD-2	90%	261.00	85.55	82.49	26.10	8.56
Grain Receiving - Railcar (GR3)	14,000	406	0.032	0.0078	N/A	0%	12.99	3.1668	66.49	12.99	3.17
Grain Loading/Shipping - Truck (GS1, GS2, GS3)	12,000	348	0.086	0.029	N/A	0%	29.93	10.09	64.70	29.93	10.09
Grain Loading/Shipping - Railcar (GS4)	50,000	1,450	0.027	0.0022	Baghouses BH1, BH2, CL-1, CL-2, CL-3, C-10, L-3, L-11	90%	39.15	3.19	82.49	3.92	0.32
Grain Cleaning - 5% of total grain (GH)	50,000	1,450	0.75	0.1875		99%	1087.50	271.88	82.49	10.88	2.72
Internal Handling (GH)	50,000	1,450	0.061	0.034	NA	99%	88.45	49.30	82.49	0.88	0.49
Grain Storage - Silos and Bins (S1 thru S9)	50,000	1,450	0.22	0.055	NA	99%	319	79.75	82.49	3.19	0.80
Grain Drying - Column Dryer (GD)	6,000	174	0.22	0.055	Perforation Plate	90%	38.28	9.57	57.01	3.83	0.96

\*Assume PM10=PM2.5

**Methodology**

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

Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 58 (lbs/bushel) x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)

PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))

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

$$E = (55.0) * (P)^{0.11} - 40$$

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

**Appendix A: Emissions Calculations  
Grain Drying - Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** The Andersons, Inc. - Delphi Grain Operations  
**Address:** 3854 N Anderson Dr, Delphi, Indiana 46923  
**Permit No.:** M015-28946-00026  
**Permit Reviewer:** Christine L. Filutze  
**Date:** June 29, 2010

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

39.5

346.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	1.32	1.32	0.10	17.31	0.95	14.54

\*PM and PM10 emission factors are for condensable and filterable PM and PM10 combined. Assume PM10=PM2.5.

\*\*Emission factor for NO<sub>x</sub>: Uncontrolled = 100 lb/MMCF.

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Grain Drying - Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Company Name:** The Andersons, Inc. - Delphi Grain Operations  
**Address:** 3854 N Anderson Dr, Delphi, Indiana 46923  
**Permit No.:** M015-28946-00026  
**Permit Reviewer:** Christine L. Filutze  
**Date:** June 29, 2010

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.635E-04	2.077E-04	1.298E-02	0.31	5.886E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.656E-05	1.904E-04	2.424E-04	6.578E-05	3.635E-04

**Total HAPs: 0.33**

Methodology is the same as previous page.  
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: Emission Calculations**  
**PM and PM10 Emissions From Grain Storage Piles (Fugitive)**

**Company Name:** The Andersons, Inc. - Delphi Grain Operations  
**Address:** 3854 N Anderson Dr, Delphi, Indiana 46923  
**Permit No.:** M015-28946-00026  
**Permit Reviewer:** Christine L. Filutze  
**Date:** June 29, 2010

**1. Emission Factors:**

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

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

where:

E<sub>f</sub> = Emission Factor (lbs/ton)  
 k = Particle size multiplier = 1 for PM and 0.35 for PM10  
 U = Mean wind speed (mph) = 12 mph  
 M = Moisture content (%) = 15.0 %

Therefore,

PM Emission Factor = 0.0006 lbs/ton process  
 PM10\*\* Emission Factor = 0.0002 lbs/ton process  
 \*\*Assume PM10 = PM2.5

**2. Uncontrolled PM/PM10/PM2.5 emissions from storage piles:**

Max. Throughput Rate: 600 tons/hr (2 piles total)  
**Uncontrolled PM =** 600 (ton/hr) x 0.0006 (lbs/ton) x 5110 (hrs/yr) x 1 ton/2000 lbs = **0.91 tons/yr**  
**Uncontrolled PM10/PM2.5 =** 600 (ton/hr) x 0.0002 (lbs/ton) x 5110 (hrs/yr) x 1 ton/2000 lbs = **0.32 tons/yr**  
 Note: Grain is stored in temporary piles outdoors for a maximum of 7 months (5110 hours)

**3. Controlled PM/PM10/PM2.5 emissions from storage piles:**

Max. Throughput Rate: 600 tons/hr (2 piles total)  
**Controlled PM =** Uncontrolled PM emissions (tons/yr) x (1-Control Efficiency (%)) = **0.05 tons/yr**  
**Controlled PM10/PM2.5 =** Uncontrolled PM10 emissions (tons/yr) x (1-Control Efficiency (%)) = **0.02 tons/yr**  
 Note: Grain is stored under waterproof tarpaulins. Long-term control efficiency is estimated at 95%.



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

**Company Name:** The Andersons, Inc. - Delphi Grain Operations  
**Address:** 3854 N Anderson Dr, Delphi, Indiana 46923  
**Permit No.:** M015-28946-00026  
**Permit Reviewer:** Christine L. Filutze  
**Date:** June 29, 2010

**1. Emission Factors:**

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

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

where:

E = emission factor (lb/vehicle mile traveled)  
s = surface material silt content (%) = 4.8 % (AP-42, Table 13.2.2-1)  
w = mean vehicle weight (tons) = 22.5 tons (see the calculations below)  
k = empirical constant = 4.9 for PM and 1.5 for PM10  
a = empirical constant = 0.7 for PM and 0.9 for PM10  
b = empirical constant = 0.45 for PM and PM10

PM Emission Factor =  $4.9 \times (4.8/12)^{0.7} \times (21.5/3)^{0.45}$  = **6.4 lbs/mile**

PM10\*\* Emission Factor =  $1.5 \times (4.8/12)^{0.9} \times (21.5/3)^{0.45}$  = **1.6 lbs/mile**

\*\*Assume PM10 = PM2.5

length of unpaved roads in one direction = **0.4 mile**

**2. Potential to Emit (PTE) of PM/PM10/PM2.5 from Unpaved Roads:**

Vehicle Type	* Trucks per day	*Average Vehicle Weight	* Total Trip Number	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10/PM2.5
		(tons)	(trips/yr)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
Straight Truck	85	13	5,500	27.0%	3.51	4,400	14.1	3.58
Hopper Truck	230	26	12,150	73.0%	19.0	9,720	31.0	7.91
<b>Total</b>	<b>315</b>			<b>100%</b>	<b>22.5</b>	<b>14,120</b>	<b>45.1</b>	<b>11.5</b>

\* This information is provided by the source.

**Methodology**

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

Note: The summation of the component vehicle weight equals the Mean Vehicle Weight.

VMT(miles/yr) = 0.4 mile/trip x 2 x Total Trip Numbers (trips/yr)

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

**TO:** Melissa Farrington  
The Andersons, Inc. – Delphi Grain Operations  
P.O. Box 119  
Maumee, OH 43537

**DATE:** August 12, 2010

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Minor Source Operating Permit Renewal  
015-28946-00026

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Harold Reed – President, Grain & Ethanol Group  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

August 12, 2010

TO: Delphi Public Library

From: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: The Andersons, Inc. – Delphi Grain Operations**  
**Permit Number: 015-28946-00026**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	GHOTOPP 8/12/2010 The Andersons, Inc. - Delphi Grain Operations 015-28946-00026 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Melissa Farrington The Andersons, Inc. - Delphi Grain Operations PO Box 119 Maumee OH 43537 (Source CAATS) via confirmed delivery										
2		Harold Reed President - Grain & Ethanol Group The Andersons, Inc. - Delphi Grain Operations PO Box 119 Maumee OH 43537 (RO CAATS)										
3		Delphi City Council and Mayors Office 201 S. Union St Delphi IN 46923 (Local Official)										
4		Carroll County Commissioners 101 West Main Street Delphi IN 46923 (Local Official)										
5		Carroll County Health Department 101 W. Main, Courthouse Delphi IN 46923-1566 (Health Department)										
6		Delphi Public Library 222 E Main St Delphi IN 46923-1593 (Library)										
7		Mr. Steve Offitt 6304 West 175 South Kewanna IN 46939 (Affected Party)										
8		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)										
9												
10												
11												
12												
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14												
15												

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<b>7</b>			