



# 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: January 13, 2012

RE: The Andersons, Inc. Seymour Wholesale Terminal / 071-30961-00013

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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Melissa Farrington  
The Andersons, Inc. Seymour Wholesale Terminal  
PO Box 119  
Maumee, OH 43537

January 13, 2012

Re: 071-30961-00013  
First Significant Revision to  
F071-23743-00013

Dear Ms. Farrington:

The Andersons, Inc. Seymour Wholesale Terminal was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F071-23743-00013 on June 19, 2007 for a stationary granulated lime fertilizer manufacturing source located at 101 Agrico Lane, Seymour, IN 47274. On September 23, 2011, the Office of Air Quality (OAQ) received an application from the source requesting the replacement of their existing 30 ton/hr rotary drum dryer with a 50 ton/hr fluid bed dryer. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jason R. Krawczyk, of my staff, at 317-234-5174 or 1-800-451-6027, and ask for extension 4-5174.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/JRK

cc: File - Jackson County  
Jackson County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F071-23743-00013	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 19, 2007  Expiration Date: June 19, 2017

First Administrative Amendment No. 071-26298-00013, issued on April 3, 2008

First Significant Permit Revision No. 071-30961-00013	
Issued By:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 13, 2012  Expiration Date: June 19, 2017

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

---

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

Source Address:	101 Agrico Lane, Seymour, Indiana 47274
General Source Phone Number:	419-891-2915
SIC Code:	5191 (Farm Supplies - Wholesale Fertilizer Distribution)
County Location:	Jackson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

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

- (a) One (1) granulator, identified as EU-01, exhausting to Stack S1, equipped with one (1) wet scrubber for particulate control, identified as WS1, capacity: 30 tons per hour of granulated lime. The granulator was installed in 1964-1965. The scrubber was installed in 1993.
- (b) One (1) dryer, identified as EU-02, constructed in 2011, with a maximum capacity of 50 tons per hour, equipped with:
  - (1) One (1) baghouse, identified as BH2, re-installed in 2011, handling 19,000 ACFM, and exhausting within the building;
  - (2) Two (2) cyclones, identified as Cycl1 and Cycl1A, each installed in 1991, handling a combined 40,000 ACFM, and one (1) wet scrubber, identified as WS2, installed in 1993, exhausting to stack S2.

Note: Airflow from EU-02 is split between BH2 and Cycl1 and Cycl1A. Cycl1 and Cycl1A are in series with WS2.
- (c) One (1) natural gas-fired burner for the dryer, identified as EU-04, constructed in 2011, with a maximum heat input capacity of 25 MMBtu/hr, and exhausting to stack S2.
- (d) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, exhausting through the general ventilation system, equipped with two (2) cyclones identified as 2A and 2, and one (1) baghouse identified as BH1 for particulate control, capacity: 30 tons per hour of granulated lime. The screening unit was installed in 2003. The cyclones and baghouse were installed in 1991.
- (e) One (1) crusher, associated with the screening and classifying process of granulated lime, installed in 2000, capacity: 10 tons per hour.

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

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This stationary source also includes the following insignificant activities:

- (a) One (1) natural gas fired steam heat boiler, installed in 1970, rated at 0.945 million British thermal units per hour. [326 IAC 6-2-3]
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Purge double block and bleed valves.
- (e) One (1) liquid fertilizer production process. There are no air emissions of any criteria pollutants from this process.
- (f) One (1) Soil Vapor Extraction system for a soil remediation project.
- (g) Other categories with emissions below insignificant thresholds.

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

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

## **SECTION B GENERAL CONDITIONS**

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

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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 2-7) shall prevail.

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

---

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

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

- 
- (a) This permit, F071-23743-00013, is issued for a fixed term of 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.5 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.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

---

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.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

---

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

#### B.14 Emergency Provisions [326 IAC 2-8-12]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality,

Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058  
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F071-23743-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

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

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

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

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

#### C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

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

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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]

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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]

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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 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.8 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. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

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

#### **C.9 Performance Testing [326 IAC 3-6]**

---

- (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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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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 2-8-4][326 IAC 2-8-5(a)(1)]**

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

---

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

#### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

---

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

#### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

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 [326 IAC 2-8-4][326 IAC 2-8-5]**

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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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

---

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
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) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

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

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

- (a) One (1) granulator, identified as EU-01, exhausting to Stack S1, equipped with one (1) wet scrubber for particulate control, identified as WS1, capacity: 30 tons per hour of granulated lime. The granulator was installed in 1964-1965. The scrubber was installed in 1993.
- (b) One (1) dryer, identified as EU-02, constructed in 2011, with a maximum capacity of 50 tons per hour, equipped with:
  - (1) One (1) baghouse, identified as BH2, re-installed in 2011, handling 19,000 ACFM, and exhausting within the building;
  - (2) Two (2) cyclones, identified as Cycl1 and Cycl1A, each installed in 1991, handling a combined 40,000 ACFM, and one (1) wet scrubber, identified as WS2, installed in 1993, exhausting to stack S2.

Note: Airflow from EU-02 is split between BH2 and Cycl1 and Cycl1A. Cycl1 and Cycl1A are in series with WS2.
- (c) One (1) natural gas-fired burner for the dryer, identified as EU-04, constructed in 2011, with a maximum heat input capacity of 25 MMBtu/hr, and exhausting to stack S2.
- (d) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, exhausting through the general ventilation system, equipped with two (2) cyclones identified as 2A and 2, and one (1) baghouse identified as BH1 for particulate control, capacity: 30 tons per hour of granulated lime. The screening unit was installed in 2003. The cyclones and baghouse were installed in 1991.
- (e) One (1) crusher, associated with the screening and classifying process of granulated lime, installed in 2000, capacity: 10 tons per hour.

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

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

#### D.1.1 FESOP and PSD Minor Limitations [326 IAC 2-8-4][326 IAC 2-2]

The PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the granulator (EU-01), and the dryer (EU-02) shall be limited to the following:

- (a) The throughput of granulated lime for the granulator (EU-01) shall be limited to 262,800 tons per consecutive twelve (12) month period and emissions from S1 shall not exceed 0.461 pounds of PM/PM<sub>10</sub>/PM<sub>2.5</sub> per ton of granulated lime processed.
- (b) The throughput of granulated lime for the dryer (EU-02) shall be limited to 262,800 tons per consecutive twelve (12) month period and emissions from S2 shall not exceed 0.226 pounds of PM/PM<sub>10</sub>/PM<sub>2.5</sub> per ton of granulated lime processed.

Compliance with these limits will limit the source wide potential to emit of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> to less than one hundred (100) tons per consecutive twelve (12) month period and render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable.

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

---

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the allowable PM emission rate from the one (1) granulator, identified as EU-01, the one (1) dryer, identified as EU-02, and the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05 shall not exceed 40.04 pounds per hour, each, when operating at a process weight rate of 30 tons per hour, each.

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

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

$$E = 4.10 P^{0.67} \text{ where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour;} \\ P = \text{process weight rate in tons per hour} \end{array}$$

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

---

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.1.4 Particulate Matter (PM)

---

In order to comply with Conditions D.1.1, and D.1.2, the cyclones, wet scrubbers, and baghouses for PM, PM<sub>10</sub>, and PM<sub>2.5</sub> control shall be in operation at all times when the one (1) fertilizer production line is in operation.

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

#### D.1.5 Visible Emissions Notations

---

- (a) Visible emission notations of the Stack S1, Stack S2, and general ventilation system stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or 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.1.6 Wet Scrubber Parametric Monitoring

---

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

- (a) When for any one reading, the flow rate of the scrubber is less than the normal minimum of 175 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps.
- (b) When for any one reading, the flow rate of the make-up water is less than the normal minimum of 6.0 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps.
- (c) When for any one reading, the pressure drop across the scrubber, identified as WS1, is outside the normal range of 0.5 to 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps.
- (d) When for any one reading, the pressure drop across the scrubber, identified as WS2, is outside the normal range of 7.0 to 13.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps.

A pressure reading that is outside the above mentioned range or a flow rate that is below the above mentioned minimum is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition.

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

#### D.1.7 Scrubber Failure Detection

---

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.1.8 Baghouse Parametric Monitoring

---

- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, at least once per day when the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05 is in operation. When for any one reading, the pressure drop across the baghouse identified as BH1 is outside the normal range of 7.0 and 14.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition.

- (b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the dryer, identified as EU-02. When for any one reading, the pressure drop across the baghouse identified as BH2 is outside the normal range of 4.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition.

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.1.9 Broken or Failed Bag Detection

---

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit 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. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### D.1.10 Cyclone Failure Detection

---

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### D.1.11 Record Keeping Requirements

---

- (a) To document the compliance status with Conditions D.1.1(a) and D.1.1(b), the Permittee shall maintain records of the throughput of granulated lime to the fertilizer production line.
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of each scrubber and baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (c) To document the compliance status with Conditions D.1.6, the Permittee shall maintain a daily record of the liquid flow rate and the pressure drop as well as the flow rate of scrubbant and make-up water across the two (2) scrubbers, identified as WS1 and WS2

used in conjunction with the one (1) fertilizer production line. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not operate that day).

- (d) To document the compliance status with Conditions D.1.8(a), the Permittee shall maintain a daily record of the pressure drop across the baghouse used in conjunction with the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not operate that day).
- (e) To document the compliance status with Conditions D.1.8(b), the Permittee shall maintain a daily record of the pressure drop across the baghouse used in conjunction with the dryer, identified as EU-02. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not operate that day).
- (f) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.12 Reporting Requirements

A quarterly report of the material throughput of granulated lime to the fertilizer production line and a quarterly summary of the information to document the compliance status with D.1.1(a) and D.1.1(b) shall be submitted no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

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

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

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

---

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: The Andersons Inc. Seymour Wholesale Terminal  
Source Address: 101 Agrico Lane, Seymour, Indiana 47274  
FESOP Permit No.: F071-23743-00013

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: The Andersons Inc. Seymour Wholesale Terminal  
Source Address: 101 Agrico Lane, Seymour, Indiana 47274  
FESOP Permit No.: F071-23743-00013

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

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

YEAR: \_\_\_\_\_

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

Source Name: The Andersons Inc. Seymour Wholesale Terminal  
 Source Address: 101 Agrico Lane, Seymour, Indiana 47274  
 FESOP Permit No.: F071-23743-00013

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

# Fugitive Dust Control Plan



**The Andersons, Inc. Seymour Wholesale Terminal  
F071-23743-00013**

**101 Agrico Lane  
Seymour, Indiana 47274**



**WRITTEN: NOVEMBER 2011**

# **PLAN CONTENTS**

Facility & Permit Information Summary

Plan Overview

- Introduction
- Objectives

Fugitive Dust Control Team

General Facility Information

- Site Map
- Facility Location
- Site Activities
- Site Description

Potential Sources of Fugitive Dust

- Limestone and Fertilizer Receiving, Handling, Granulation and Shipping
- Limestone and Fertilizer Storage
- Unpaved Roads and Parking

Control Measures

- Limestone and Fertilizer Receiving, Handling, Granulation and Shipping
- Limestone and Fertilizer Storage
- Roads and Parking Areas
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- Good Housekeeping Practices
- Environmental Protection Policy (80.10)

Plan Revisions

Recordkeeping and Reporting

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# FACILITY & PERMIT INFORMATION SUMMARY

**Facility Name:** The Andersons Seymour facility

**Facility Address:** 101 Agrico Lane  
Seymour, Indiana 47274

**Facility Contact:** Mike Searcy  
Operations Manager

PLANT: (812) 522-1786

CELL: (812) 525-9316

**Emergency Contact:** Stacy Schmidt  
Director, Hazard Management

OFFICE: (419) 891-2957

CELL: (419) 344-1693

HOME: (419) 878-3000

**24 Hour Emergency Hotline:** (800) 757-8951

**Facility SIC Code:** 5191

**Permit Type:** FESOP

**Permit Number:** FO71-23743-00013

**Effective Date:** 06/19/2007

# OVERVIEW

## INTRODUCTION

This fugitive dust control plan covers the operations at The Andersons Seymour facility. It has been developed as a requirement of the significant revision of the facility's FESOP air permit and in accordance with good engineering practices. This fugitive dust control plan describes this facility and its operations, identifies potential sources of fugitive dust emissions at the facility, recommends appropriate control measures to reduce the discharge of fugitive air emissions, and provides for periodic review of this fugitive dust control plan.

This fugitive dust control plan became effective as of November, 2011. However, the controls discussed in the plan have been in place since the facility began operations with The Andersons in June, 1999.

## OBJECTIVES

The purpose of this fugitive dust control plan is to describe the particulate emissions control program for The Andersons Seymour facility. Fugitive emissions are those that cannot reasonably pass through a stack, chimney, vent or other functionally equivalent opening. The Andersons Seymour facility will operate the facility in accordance with this fugitive dust control plan as outlined below. This plan has been developed in accordance with 326 IAC 6-5-4. This plan is not intended to be static and will be revised as necessary.

The objective of this fugitive dust control plan is three-fold: (1) to identify potential sources of fugitive dust emissions at The Andersons Seymour facility; (2) to describe control measures to reduce the discharge of fugitive air emissions at The Andersons Seymour facility; and (3) to provide other elements such as, but not limited to, a facility inspection program, site compliance evaluation program, and recordkeeping and reporting programs that will help The Andersons Seymour facility comply with the terms and conditions of the FESOP permit.

## FUGITIVE DUST CONTROL TEAM

The fugitive dust control team is responsible for developing, implementing, maintaining, and revising this plan. The members of the team are familiar with the management and operations of The Andersons Seymour facility. The members of the team and their primary responsibilities are as follows:

Name & Title	Responsibility
<b>Mike Searcy</b> Operations Manager	Implementation, maintenance, recordkeeping, inspections, training (primary)
<b>Melissa Farrington</b> Environmental Health Administrator	Reporting, annual evaluation, certification (primary); maintenance, recordkeeping (secondary)
<b>Stacy Schmidt</b> Director, Hazard Management	Implementation, maintenance, recordkeeping, inspections, training (primary)
<b>Denny Addis</b> President, Plant Nutrient Group	Signing (primary)

# **GENERAL FACILITY INFORMATION**

## **SITE MAP**

A site map of the facility showing the following features is attached:

- buildings and other permanent structures

## **FACILITY LOCATION**

The Andersons Seymour facility is located at 101 Agrico Lane, Seymour, Indiana. This facility is approximately 20 acres and is bordered to the south by an Indiana Department of Transportation Maintenance Office, to the east by an agricultural field, to the north by railroad tracks and to the west by a lumberyard.

## **SITE ACTIVITIES**

The Andersons Seymour facility operates 8 hours per day; 5 days per week with a staff of approximately 12 people and will add seasonal employees during the months of March and May. It consists of the following operations: limestone receiving, storage, pelletizing and shipping; other bagged and bulk fertilizer, and liquid fertilizer production.

## **SITE DESCRIPTION**

The site consists of a limestone granulation building built in 1929, dry fertilizer plant built in the 1930's, various storage warehouses, maintenance shop, breakroom, and office building; liquid fertilizer production plant, a tank farm with liquid 10-34-0 fertilizer in a secondary containment dike; anhydrous ammonia tanks; and a stormwater pond.

# **POTENTIAL SOURCES OF FUGITIVE DUST**

For each potential source of fugitive dust emissions on site, an evaluation is conducted to assess the contribution to air quality. Areas of focus include:

- limestone and fertilizer receiving areas
- limestone granulation and fertilizer handling equipment
- limestone and fertilizer storage areas
- granulated limestone and fertilizer shipping areas
- unpaved roadways and parking areas
- any other areas deemed appropriate

## CONTROL MEASURES

Fugitive dust control measures will be implemented to reduce the amount of emissions discharged from The Andersons Seymour facility.

### CONTROLS

The following controls will be implemented in the affected areas where fugitive emissions have the potential to occur:

- Limestone and Fertilizer Receiving, Handling, Granulation, and Shipping

Receiving and Shipping- Oil is used for dust control on the granulated product shipped from the facility.

Granulated limestone fertilizer production is controlled with wet scrubbers, cyclones, and baghouse at various points in the granulation production process. Oil is also used for dust control during production.

Fugitive dust from egress points (building windows, doors, etc) will be investigated and corrective action will be taken to eliminate visible emissions.

- Limestone and Fertilizer Storage

Fugitive dust from egress points (building windows, doors, etc) will be investigated and corrective action will be taken to eliminate visible emissions.

- Roads and Parking Areas

All main roads and parking areas within the plant are unpaved.

The primary vehicle traffic is comprised of:

Freight trucks with 3 axles on the trailer.

Other vehicle traffic is comprised of supplies delivery trucks as well as employee, plant maintenance and visitor vehicles.

Any material spillage will be cleaned up immediately. A speed limit of 15 MPH is posted and enforced for all vehicles.

Unpaved roads or parking areas are sprayed with water to suppress fugitive dust as needed. Application of other acceptable dust suppressants will be investigated, as necessary.

A street sweeper is utilized periodically to sweep Agrico Lane

- **Preventive Maintenance / Routine Inspections**

Preventive maintenance involves the regular inspection, testing, and cleaning of facility equipment and operational systems. These inspections help to uncover conditions which might lead to fugitive air emissions and, as a result, allow such a release to be prevented.

- **Comprehensive and Other Inspections**

Comprehensive inspections of the facility (equipment, plant areas, and controls) are performed at least annually. Such comprehensive inspections will also evaluate the more frequent routine inspections performed at The Andersons Seymour facility. The comprehensive inspection schedule will be completed in accordance with the dates established in the facility's Loss Prevention Plan. Records of the inspections are kept on file with this plan.

Visual inspections of identified fugitive emissions points will be completed by an employee daily when the equipment in question is in operation. Abnormal emissions will be reported to a member of the fugitive dust control team for immediate follow-up.

- **Good Housekeeping Practices**

Good housekeeping practices are designed to maintain a clean and orderly work environment. Housekeeping practices are to be conducted in accordance with the established "Environmental Protection Policy" (80.10) (copy attached) and any site-specific housekeeping protocols.

## ENVIRONMENTAL PROTECTION POLICY

<b>AREA AFFECTED:</b>	All Company Locations
<b>PERSONNEL AFFECTED:</b>	All Employees

### POLICY OVERVIEW

Every company operation will manage their activities in a manner which reflects a reasonable and proper concern for environmental quality. Operations management will comply with all applicable environmental laws and regulations. This policy establishes procedures to prevent or abate pollution concerns which may arise or result from operational activities.

### POLICY REQUIREMENTS

**TRAINING:** All employees must be properly trained on the environmental aspects of their job functions. Training should be repeated as necessary to maintain an appropriate level of knowledge and awareness. New employee orientation must also include a review of this policy.

**PROCEDURAL:** Every employee must take an active role in the implementation of this policy. All employees are expected to represent the company's commitment to environmental stewardship. Failure to abide by this policy may result in disciplinary action.

**DOCUMENTATION:** Permits, spill plans, and other records required by the regulations or company policy must be maintained as appropriate.

### GENERAL POLICY

#### A. Pollution Control

Operations should control all sources of pollution to a level permissible by law or lower. All pollution control devices must be designed and maintained to ensure that emissions into the environment are absolutely minimized.

The potential for air emissions is a major concern at a number of company facilities. All operations should seek to minimize all sources of air emissions, including fugitive emissions. Organic vapor (odorous) emissions must also be controlled appropriately.

All operations with an aggregate total liquid storage capacity of 500 gallons or more must have implemented an effective spill plan. Such plans must be documented and kept up-to-date. Sample plans and other guidance are available from the Safety & Security Department. Spill clean-up activities at all company facilities shall adhere to the company's Spill Response policy (80.30).

All products that have been determined to be harmful or otherwise objectionable shall be properly stored, handled, and disposed of in order to minimize the potential for water pollution. Housekeeping will be of critical importance in this regard. Collected rainwater in secondary containment dikes must be handled appropriately. Ideally, dike water will be stored for use in cutting, make-up, liquid production, spraying, etc. Only dike water that is clear, free of any sheen, free of any odors, and has been tested for nitrate content may be discharged over the dike wall. All discharges are to be documented in the Ag Group Steel Bulk Storage database on Lotus Notes.

Driveways and parking areas should be swept as necessary or required by permit, local ordinance, or agreement. Sweeping of paved surfaces may be done by either mechanical sweeper or manual broom cleaning. Accumulated debris should be disposed of properly.

All solid wastes generated at company facilities must be disposed of in a licensed sanitary landfill or properly recycled. Whenever possible, recycling options should be exercised over disposal. However, waste or spoiled grain, cobs, or other natural products should only be land-applied if it can be physically worked into the soil immediately. No free liquids can be disposed of in any dumpster. Under no circumstances will solid wastes, including ordinary combustibles, be burned at any company facility. All hazardous wastes must be handled independently of non-hazardous solid wastes and in accordance with the pertinent regulations.

Certain materials that have been determined to be special hazards must be handled with special care. This class of materials includes PCB equipment, asbestos-containing materials, certain pesticides, and other regulated materials. Operations management must be aware of the existence, whereabouts, and condition of any such materials in their respective facilities.

Except for plant evacuation alarms and other emergency signaling devices, no noise source should exceed 75 dBA as measured at the company's property line.

## **B. Environmental Permits**

A permit to construct or install (PTI) must be obtained from the appropriate pollution control agency well in advance of any construction / installation of any new facility, equipment, process, or pollution control device which may be a source of emissions. Operations management must coordinate plans for all new processes and equipment with the Engineering and Safety & Security departments to ensure that all PTI requirements will be met. Permits to operate (PTO) are typically issued to potential pollution sources and serve as "licenses" to emit pollutants into the environment under certain conditions. The "Special Terms and Conditions" specified in a PTO must be followed in order for the permit to remain valid and in good standing.

The Safety & Security Department has been designated as the primary contact for all permit matters with the various regulatory agencies, including inspections of company facilities.

## **C. Reporting and Recordkeeping**

Operations management is responsible to maintain records and complete reports as necessary to comply with pertinent regulations, permit conditions, and company policies. The Safety & Security Department is available to assist in these matters.

**POLICY DATE: 07/84**

**REVISED DATE: 04/11**

## PLAN REVISIONS

Any necessary revisions to the fugitive dust control plan will be documented below:

<u>DATE</u>	<u>PLAN CHANGE DESCRIPTION</u>
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## **RECORDKEEPING AND REPORTING**

Records of all preventive maintenance inspections, site inspections, records of employee training sessions, and any other reports are retained at The Andersons Seymour facility.

These records will be made available, upon request, to representatives of Indiana Department of Environmental Management and other environmental regulators.

# **CERTIFICATION OF THE FUGITIVE DUST CONTROL PLAN**

I certify that this fugitive dust control plan has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete.

---

Stacy Schmidt  
Director, Hazard Management

Date:

# **CERTIFICATION OF THE FUGITIVE DUST CONTROL PLAN**

I certify that this fugitive dust control plan has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete.

---

Mike Searcy  
Operations Manager

Date:

# **CERTIFICATION OF THE FUGITIVE DUST CONTROL PLAN**

I certify that this fugitive dust control plan has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete.

---

Richard Whitesell  
Regional Operations Manager

Date:

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Source Location:** 101 Agrico Lane, Seymour, IN 47274  
**County:** Jackson  
**SIC Code:** 5191 (Farm Supplies - Wholesale Fertilizer Distribution)  
**Operation Permit No.:** F 071-23743-00013  
**Operation Permit Issuance Date:** June 19, 2007  
**Significant Permit Revision No.:** 071-30961-00013  
**Permit Reviewer:** Jason R. Krawczyk

On September 23, 2011 the Office of Air Quality (OAQ) received an application from The Andersons, Inc. Seymour Wholesale Terminal related to a modification to an existing stationary granulated lime fertilizer manufacturing source.

**Existing Approvals**

The source was issued FESOP Renewal No. 071-23743-00013 on June 19, 2007. The source has since received Administrative Amendment No. 071-26298-00013, issued on April 3, 2008.

**County Attainment Status**

The source is located in Jackson County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective December 29, 2005, 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 PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
 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. Jackson 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>**  
 Jackson 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. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10)

tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants  
 Jackson County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e*	Total HAPs	Worst Single HAP
EU-01 Granulator	60.58	60.58	60.58	-	-	-	-	-	-	-
EU-02 Dryer	29.70	29.70	29.70	-	-	-	-	-	-	-
EU-04 Burner	0.13	0.53	0.53	0.04	7.01	0.39	5.89	8,461	0.13	0.13 Hexane
EU-05 Screen and Classifying Process	7.88	7.88	7.88	-	-	-	-	-	-	-
Crushing Operation	0.74	0.74	0.74	-	-	-	-	-	-	-
Insignificant Boiler	0.01	0.03	0.03	Negl.	0.41	0.02	0.35	500	Negl.	Negl.
<b>Total PTE of Entire Source</b>	<b>99.04</b>	<b>99.46</b>	<b>99.46</b>	<b>0.04</b>	<b>7.42</b>	<b>0.41</b>	<b>6.24</b>	<b>8,961</b>	<b>0.13</b>	<b>0.13 Hexane</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible

These emissions are based upon the limits in FESOP Renewal 071-23743-00013 and the unrestricted potential to emit from the emission units without limits. GHGs as CO<sub>2</sub>e emissions were calculated for EU-04 and the one (1) insignificant boiler for the purpose of this review. Previously, fugitive roadway emission calculations were not performed and have been evaluated for the purpose of this review.

\* The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

\*\* Fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability. The source is subject to the requirements of 326 IAC 6-5, because the unpaved and paved roadways have potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, which is included as Attachment A to the permit. Therefore, the potential emissions from the roadways are evaluated after the use of particulate controls.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

<b>Description of Proposed Revision</b>
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The Office of Air Quality (OAQ) has reviewed an application, submitted by The Andersons, Inc. Seymour Wholesale Terminal on September 23, 2011, relating to:

- (a) The change in SIC code from 2874 to 5191 to more accurately reflect the operations the source is primarily engaged in;
- (b) The replacement of the existing 30 ton per hour dryer, identified as EU-02, with a new 50 ton per hour dryer to be identified as EU-02, that will continue to operate under the existing FESOP throughput limits; and
- (c) The replacement of the existing 16 MMBtu/hr burner, identified as EU-04, with a new 25 MMBtu/hr burner to be identified as EU-04, that will continue to operate under the existing FESOP throughput limits.

The new 50 ton per hour dryer will use the existing add-control devices (Cycl1, Cycl1A, and WS2) and a formerly decommissioned baghouse (BH2).

The replacement units were installed prior to obtaining the proper construction approval and are considered unpermitted emission units.

- (d) The correction of the emission unit description for the one (1) screen and classifying process of granulated lime. The screening unit originally installed in 1964-1965 was replaced in kind in 2003.

The following is a list of the unpermitted emission units:

- (a) One (1) dryer, identified as EU-02, constructed in 2011, with a maximum capacity of 50 tons per hour, equipped with:
  - (1) One (1) baghouse, identified as BH2, re-installed in 2011, handling 19,000 ACFM, and exhausting within the building;
  - (2) Two (2) cyclones, identified as Cycl1 and Cycl1A, each installed in 1991, handling a combined 40,000 ACFM, and one (1) wet scrubber, identified as WS2, installed in 1993, exhausting to stack S2.

Note: Airflow from EU-02 is split between BH2 and Cycl1 / Cycl1A. Cycl1 and Cycl1A are in series with WS2.
- (b) One (1) natural gas-fired burner for the dryer, identified as EU-04, constructed in 2011, with a maximum heat input capacity of 25 MMBtu/hr, and exhausting to stack S2.

<b>Enforcement Issues</b>
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IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit.

IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Existing EU-02 Dryer	(197.10)	(197.10)	(197.10)	-	-	-	-	-	-	-
Existing EU-04 Burner	(0.13)	(0.53)	(0.53)	(0.04)	(7.01)	(0.39)	(5.89)	(8,461)	(0.13)	(0.13) Hexane
New EU-02 Dryer	328.50	328.50	328.50	-	-	-	-	-	-	-
New EU-04 Burner	0.21	0.83	0.83	0.07	10.95	0.60	9.20	13,220	0.21	0.20 Hexane
<b>Total PTE of Proposed Revision</b>	<b>131.48</b>	<b>131.70</b>	<b>131.70</b>	<b>0.03</b>	<b>3.94</b>	<b>0.21</b>	<b>3.31</b>	<b>4,759</b>	<b>0.08</b>	<b>0.07 Hexane</b>
negl. = negligible Parenthesis "(" )" denote a decrease in emissions. Decreases in emissions are the result of emission unit removal.										

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E)(i), because the revision involves the construction of one (1) fluid bed dryer, identified as EU-02, with one (1) natural gas-fired burner, identified as (EU-04), with potential to emit (PTE) greater than 25 tons per year.

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
EU-01 Granulator	60.58	60.58	60.58	-	-	-	-	-	-	-
EU-02 Dryer	29.70	29.70	29.70	-	-	-	-	-	-	-
EU-04 Burner	<del>0.13</del> <b>0.21</b>	<del>0.53</del> <b>0.83</b>	<del>0.53</del> <b>0.83</b>	<del>0.04</del> <b>0.07</b>	<del>7.01</del> <b>10.95</b>	<del>0.39</del> <b>0.60</b>	<del>5.89</del> <b>9.20</b>	<del>8,461</del> <b>13,220</b>	<del>0.13</del> <b>0.21</b>	<del>0.13</del> <b>0.20</b> Hexane
EU-05 Screen and Classifying Process	7.88	7.88	7.88	-	-	-	-	-	-	-
Crushing Operation	0.74	0.74	0.74	-	-	-	-	-	-	-
Insignificant Boiler	0.01	0.03	0.03	Negl.	0.41	0.02	0.35	500	Negl.	Negl.
Unpaved Roads ***	39.86	10.16	1.02	-	-	-	-	-	-	-
Paved Roads***	1.07	0.21	0.05	-	-	-	-	-	-	-
Total PTE of Entire Source	<del>99.04</del> <b>99.12</b>	<del>99.46</del> <b>99.76</b>	<del>99.46</del> <b>99.76</b>	<del>0.04</del> <b>0.07</b>	<del>7.42</del> <b>11.36</b>	<del>0.41</del> <b>0.63</b>	<del>6.24</del> <b>9.55</b>	<del>8,961</del> <b>13,720</b>	<del>0.13</del> <b>0.21</b>	<del>0.13</del> <b>0.20</b> Hexane
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. *** Fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability. Previously, fugitive roadway emission calculations were not performed. The source is subject to the requirements of 326 IAC 6-5, because the unpaved and paved roadways have potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, which is included as Attachment A to the permit. Therefore, the potential emissions from the roadways are evaluated after the use of particulate controls.										

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
EU-01 Granulator	60.58	60.58	60.58	-	-	-	-	-	-	-
EU-02 Dryer	29.70	29.70	29.70	-	-	-	-	-	-	-
EU-04 Burner	0.21	0.83	0.83	0.07	10.95	0.60	9.20	13,220	0.21	0.20 Hexane
EU-05 Screen and Classifying Process	7.88	7.88	7.88	-	-	-	-	-	-	-
Crushing Operation	0.74	0.74	0.74	-	-	-	-	-	-	-
Insignificant Boiler	0.01	0.03	0.03	Negl.	0.41	0.02	0.35	500	Negl.	Negl.
Unpaved Roads ***	39.86	10.16	1.02	-	-	-	-	-	-	-
Paved Roads***	1.07	0.21	0.05	-	-	-	-	-	-	-
Total PTE of Entire Source	99.12	99.76	99.76	0.07	11.36	0.63	9.55	13,720	0.21	0.20 Hexane
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. *** Fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability. Previously, fugitive roadway emission calculations were not performed. The source is subject to the requirements of 326 IAC 6-5, because the unpaved and paved roadways have potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, which is included as Attachment A to the permit. Therefore, the potential emissions from the roadways are evaluated after the use of particulate controls.										

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The throughput of granulated lime for the granulator (EU-01) shall be limited to 262,800 tons per consecutive twelve (12) month period and 0.461 pounds of PM<sub>10</sub>/PM<sub>2.5</sub> per ton of granulated lime processed.
- (2) The throughput of granulated lime for the dryer (EU-02) shall be limited to 262,800 tons per consecutive twelve (12) month period and 0.226 pounds of PM<sub>10</sub>/PM<sub>2.5</sub> per ton of

granulated lime processed.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) The throughput of granulated lime for the granulator (EU-01) shall be limited to 262,800 tons per consecutive twelve (12) month period and 0.461 pounds of PM per ton of granulated lime processed.
- (2) The throughput of granulated lime for the dryer (EU-02) shall be limited to 262,800 tons per consecutive twelve (12) month period and 0.226 pounds of PM per ton of granulated lime processed.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Note: These are existing limits and are not being revised in this revision.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95) are not included for the existing insignificant activity boiler, because this source is not a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJ, are not included in the permit for the existing insignificant activity boiler because the boiler is considered a gas-fired boiler, as defined by 40 CFR 63.11237, and is specifically exempted under 40 CFR 63.11195(e).
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
---

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 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.
- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) 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.
  - (2) 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.
- (g) 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is subject to the requirements of 326 IAC 6-5, because the unpaved and paved roadways have potential fugitive particulate emissions greater than 25 tons per year. Pursuant to

326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, which is included as Attachment A to the permit. This is a new requirement. This is a Title I change.

Dryer EU-02

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the dryer, identified as EU-02, shall not exceed 44.58 pounds per hour when operating at a process weight rate of 50 tons per hour. The pound per hour limitation was calculated with the following equation:

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:

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

The cyclones, identified as Cycl1 and Cycl1A, and one (1) wet scrubber, identified as WS2 shall be in operation at all times the dryer, identified as EU-02, is in operation, in order to comply with this limit.

This is a Title I change.

- (j) 326 IAC 12 (New Source Performance Standards)  
 See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
 See Federal Rule Applicability Section of this TSD.

**Compliance Determination, Monitoring and Testing Requirements**

The new fluid bed dryer (EU-02) will utilize the existing cyclones (Cycl1 and Cycl1A) and the existing wet scrubber (WS2). Therefore, the existing compliance requirements for these controls will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 071-23743-00013, issued on June 19, 2006.

In addition to the existing control devices identified above, the source will be re-installing a baghouse (BH2) which will handle 19,000 ACFM from the fluid bed dryer (EU-02). BH2 will exhaust within the building.

The compliance monitoring requirements applicable to this re-installed control device are as follows:

Control ID	Parameter	Frequency	Range	Excursions and Exceedances
BH2	Pressure Drop	Daily	4.0 - 6.0 inches water	Response Steps

**Proposed Changes**

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

...  
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]  
 This stationary source consists of the following emission units and pollution control devices:  
 One (1) fertilizer production line consisting of the following:

- (a) One (1) granulator, identified as EU-01, exhausting to Stack S1, equipped with one (1) wet scrubber for particulate control, identified as WS1, capacity: 30 tons per hour of granulated lime. The granulator was installed in 1964-1965. The scrubber was installed in 1993.
  - ~~(b) One (1) dryer, identified as EU-02, exhausting to Stack S2, equipped with two (2) cyclones, identified as Cycl1 and Cycl1A, and one (1) wet scrubber, identified as WS2, for particulate control, capacity: 30 tons per hour of granulated lime. The dryer was installed in 1964-1965. The cyclones were installed 1991. The scrubber was installed in 1993.~~
  - (b) One (1) dryer, identified as EU-02, constructed in 2011, with a maximum capacity of 50 tons per hour, equipped with:**
    - (1) One (1) baghouse, identified as BH2, re-installed in 2011, handling 19,000 ACFM, and exhausting within the building;**
    - (2) Two (2) cyclones, identified as Cycl1 and Cycl1A, each installed in 1991, handling a combined 40,000 ACFM, and one (1) wet scrubber, identified as WS2, installed in 1993, exhausting to stack S2.**
- Note:** Airflow from EU-02 is split between BH2 and Cycl1 and Cycl1A. Cycl1 and Cycl1A are in series with WS2.
- ~~(c) One (1) natural gas fired burner for the dryer, identified as EU-04, exhausting to Stack S2, rated at 16 million British thermal units per hour. The Burner was installed in 1964-1965.~~
  - (c) One (1) natural gas-fired burner for the dryer, identified as EU-04, constructed in 2011, with a maximum heat input capacity of 25 MMBtu/hr, and exhausting to stack S2.**
  - (d) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, exhausting through the general ventilation system, equipped with two (2) cyclones identified as 2A and 2, and one (1) baghouse identified as BH1 for particulate control, capacity: 30 tons per hour of granulated lime. The screening unit was installed in ~~1964-1965~~ **2003**. The cyclones and baghouse were installed in 1991.

...

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

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

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

...

- ~~(b) One (1) dryer, identified as EU-02, exhausting to Stack S2, equipped with two (2) cyclones, identified as Cycl1 and Cycl1A, and one (1) wet scrubber, identified as WS2, for particulate control, capacity: 30 tons per hour of granulated lime. The dryer was installed in 1964-1965. The cyclones were installed 1991. The scrubber was installed in 1993.~~
- (b) One (1) dryer, identified as EU-02, constructed in 2011, with a maximum capacity of 50 tons per hour, equipped with:**

- (1) **One (1) baghouse, identified as BH2, re-installed in 2011, handling 19,000 ACFM, and exhausting within the building;**
- (2) **Two (2) cyclones, identified as Cycl1 and Cycl1A, each installed in 1991, handling a combined 40,000 ACFM, and one (1) wet scrubber, identified as WS2, installed in 1993, exhausting to stack S2.**
- Note: Airflow from EU-02 is split between BH2 and Cycl1 and Cycl1A. Cycl1 and Cycl1A are in series with WS2.**
- ~~(c) One (1) natural gas fired burner for the dryer, identified as EU-04, exhausting to Stack S2, rated at 16 million British thermal units per hour. The Burner was installed in 1964-1965.~~
- (c) **One (1) natural gas-fired burner for the dryer, identified as EU-04, constructed in 2011, with a maximum heat input capacity of 25 MMBtu/hr, and exhausting to stack S2.**
- (d) One (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, exhausting through the general ventilation system, equipped with two (2) cyclones identified as 2A and 2, and one (1) baghouse identified as BH1 for particulate control, capacity: 30 tons per hour of granulated lime. The screening unit was installed in ~~1964-1965~~ **2003**. The cyclones and baghouse were installed in 1991.
- ...

**D.1.1 PM and ~~PM<sub>40</sub>~~ Emission FESOP and PSD Minor Limitations [326 IAC 2-8-4][326 IAC 2-2]**

~~(a)~~ The PM, ~~and~~ PM<sub>10</sub>, **and** PM<sub>2.5</sub> emissions from the granulator (EU-01), and the dryer (EU-02) shall be limited to the following:

~~(1)(a)~~ The throughput of granulated lime for the granulator (EU-01) shall be limited to 262,800 tons per consecutive twelve (12) month period and **emissions from S1 shall not exceed 0.461 pounds of PM/PM<sub>10</sub>/PM<sub>2.5</sub> per ton of granulated lime processed.**

~~(2)(b)~~ The throughput of granulated lime for the dryer (EU-02) shall be limited to 262,800 tons per consecutive twelve (12) month period and **emissions from S2 shall not exceed 0.226 pounds of PM/PM<sub>10</sub>/PM<sub>2.5</sub> per ton of granulated lime processed.**

~~(b)~~ Compliance with these limits will limit the source wide potential to emit of PM, ~~and~~ PM<sub>10</sub>, **and** PM<sub>2.5</sub> to less than one hundred (100) tons per consecutive twelve (12) month period and render the requirements of 326 IAC 2-7 (**Part 70 Permit Program**) and 326 IAC 2-2 (**PSD**) not applicable.

**D.1.4 Particulate Matter (PM)**

In order to comply with Conditions D.1.1, and D.1.2, the cyclones, wet scrubbers, and baghouses for PM, ~~and~~ PM<sub>10</sub>, **and** PM<sub>2.5</sub> control shall be in operation at all times when the one (1) fertilizer production line is in operation.

**D.1.12 Reporting Requirements**

**A quarterly report of the material throughput of granulated lime to the fertilizer production line and a quarterly summary of the information to document the compliance status with D.1.1(a) and D.1.1(b) shall be submitted no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation**

**with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

...

#### **Attachment A: Fugitive Dust Control Plan**

...

(b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

1. 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".
2. Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
3. 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."
4. 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."
5. 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.
6. IDEM has decided to clarify the certification requirements in Section B - Duty to Provide Information and Section B - Certification.
7. 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.
8. IDEM has revised the language of the Section B - Preventive Maintenance Plan, Section C - Compliance Monitoring, Section C - General Record Keeping, and Section C - General Reporting to allow the Permittee to not have to begin implementing the requirements of these conditions until ninety days after initial start up.
9. IDEM has added the telephone and facsimile information for the Southwest and Southeast Regional Offices to Section B - Emergency Provisions.
10. 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.
11. IDEM has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviations from 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.
12. 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.
  13. IDEM has decided to reference 326 IAC 2 in Section B - Source Modification Requirements, rather than specific construction rule.
  14. 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.
  15. IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
  16. 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.
  17. IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
  18. 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
  19. IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
  20. 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.
  21. 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.
  22. The voice of 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.
  23. IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

24. IDEM has included the replacement of an instrument as an acceptable action in Section D - Parametric Monitoring.
25. The word "status" has been added to Section D - Record Keeping Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
26. The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report Form to match the underlying rule.
27. Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e). Therefore, CO<sub>2</sub>e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO<sub>2</sub>e per year (see ATSD Appendix A for detailed calculations). For clarity, Condition C.2 - Overall Source Limit, has been revised.

...

A.1 General Information [326 IAC 2-8-3(b)]

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

Source Address:	101 Agrico Lane, Seymour, Indiana 47274
Mailing Address:	P.O. Box 119, Maumee, Ohio 43537
General Source Phone Number:	419-891-2915
SIC Code:	<b>2874 5191 (Farm Supplies - Wholesale Fertilizer Distribution)</b>

...

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

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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 2-7) shall prevail.~~

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

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

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

~~B.5 — Severability [326 IAC 2-8-4(4)]~~

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

~~B.6 — Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]~~

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

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

~~(a) — The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~

~~(b) — For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

~~B.8 — Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]~~

~~(a) — Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

~~(b) — One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~

~~(c) — An "authorized individual" is defined at 326 IAC 2-1.1-1(1).~~

~~B.9 — Annual Compliance Certification [326 IAC 2-8-5(a)(1)]~~

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

~~Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

~~(b) — The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the~~

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

- (c) ~~The annual compliance certification report shall include the following:~~
- ~~(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;~~
  - ~~(2) The compliance status;~~
  - ~~(3) Whether compliance was continuous or intermittent;~~
  - ~~(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and~~
  - ~~(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.~~

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

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

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

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

- (a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~
- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
  - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
  - ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~
- (b) ~~A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (c) ~~To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

~~B.12 Emergency Provisions [326 IAC 2-8-12]~~

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

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

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

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

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

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

~~Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or~~

~~Telephone Number: 317-233-0178 (ask for Compliance Section)~~

~~Facsimile Number: 317-233-6865~~

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

~~Indiana Department of Environmental Management~~

~~Compliance Branch, Office of Air Quality~~

~~100 North Senate Avenue~~

~~MC 61-53 IGCN 1003~~

~~Indianapolis, Indiana 46204-2254~~

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

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

~~(A) — A description of the emergency;~~

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

~~(C) — Corrective actions taken.~~

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

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

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

- (d) ~~This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- (e) ~~The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.~~
- (f) ~~Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.~~
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
- (1) ~~If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
- (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
- (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
- (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.~~
- ~~Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~
- (h) ~~The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

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

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- (a) ~~All terms and conditions of permits established prior to F071-23743-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either:~~
- (1) ~~incorporated as originally stated,~~
- (2) ~~revised, or~~
- (3) ~~deleted~~
- (b) ~~All previous registrations and permits are superseded by this permit.~~

~~B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]~~

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

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

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

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

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

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

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

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

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

- ~~(1) — That this permit contains a material mistake.~~
- ~~(2) — That inaccurate statements were made in establishing the emissions standards or other terms or conditions.~~
- ~~(3) — That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]~~

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

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

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

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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 2-8-3.~~

~~Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~Request for renewal shall be submitted to:~~

~~Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

~~(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

~~B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]~~

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

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

~~Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

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

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

- (1) ~~The changes are not modifications under any provision of Title I of the Clean Air Act;~~
- (2) ~~Any approval required by 326 IAC 2-8-11.1 has been obtained;~~
- (3) ~~The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);~~
- (4) ~~The Permittee notifies the:~~

~~Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

~~and~~

~~United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

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

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

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

- (b) ~~Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).~~
- (c) ~~Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.~~
- (d) ~~Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

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

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

~~B.21 — Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]~~

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

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

~~B.22 — Transfer of Ownership or Operational Control [326 IAC 2-8-10]~~

- ~~(a) — The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~
- ~~(b) — Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~

~~Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

- ~~(c) — The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

~~B.23 — Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]~~

- ~~(a) — The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.~~
- ~~(b) — Failure to pay may result in administrative enforcement action or revocation of this permit.~~

- (c) ~~The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

~~B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]~~

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

~~...~~

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

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

~~C.2 Overall Source Limit [326 IAC 2-8]~~

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

- ~~(a) Pursuant to 326 IAC 2-8:~~

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

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

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

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

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

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

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

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

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

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

~~The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.~~

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

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

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

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

~~C.7 — Stack Height [326 IAC 1-7]~~

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

~~C.8 — Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

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

- ~~(d) — The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

- ~~(e) — Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~(f) — Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~
- ~~(g) — Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.~~

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

~~C.9 — Performance Testing [326 IAC 3-6]~~

- 
- ~~(a) — All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

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

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

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

~~Compliance Requirements [326 IAC 2-1.1-11]~~

~~C.10 Compliance Requirements [326 IAC 2-1.1-11]~~

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

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

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

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

~~Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~(1) initial inspection and evaluation;~~

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

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

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

~~(1) monitoring results;~~

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

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

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

(e) — The Permittee shall maintain the following records:

- (1) — monitoring data;
- (2) — monitor performance data, if applicable; and
- (3) — corrective actions taken.

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

- ~~(a) — When the results of a stack test performed in conformance with Section C – Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~
- ~~(b) — A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~
- ~~(c) — IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.~~

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

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

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

- ~~(a) — Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- ~~(b) — Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

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

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

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality~~

~~100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

- ~~(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- ~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~

#### Stratospheric Ozone Protection

##### ~~G.19 Compliance with 40 CFR 82 and 326 IAC 22-1~~

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

- ~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- ~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- ~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

~~...~~

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

**Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.**

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

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

##### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]**

**This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:**

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin**

operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

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- (a) This permit, F071-23743-00013, 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.5 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.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

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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.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]**

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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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

**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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.**
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:**
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;**
  - (2) The permitted facility was at the time being properly operated;**
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;**
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;**

**Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.**

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

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

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

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

- (A) A description of the emergency;**
- (B) Any steps taken to mitigate the emissions; and**
- (C) Corrective actions taken.**

**The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

- (6) The Permittee immediately took all reasonable steps to correct the emergency.**
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.**
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.**
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.**
- (g) Operations may continue during an emergency only if the following conditions are met:**
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.**
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:**

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F071-23743-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (4) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of

**this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]**

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

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and**
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.**
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.**

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.**
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**

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

**Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]**

**B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;**
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;**
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);**
- (4) The Permittee notifies the:**

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

**and**

**United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590**

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

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

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

- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

**B.21 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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.

...

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

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

**C.2 Overall Source Limit [326 IAC 2-8]**

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

- (a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
  - (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
  - (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
  - (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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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]**

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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]**

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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 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.8 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. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

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

##### C.9 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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### Compliance Requirements [326 IAC 2-1.1-11]

##### C.10 Compliance Requirements [326 IAC 2-1.1-11]

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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 2-8-4][326 IAC 2-8-5(a)(1)]**

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

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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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**  
**[326 IAC 2-8-4][326 IAC 2-8-5]**

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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.**

**The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

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

### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
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) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided

**for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.**

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

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Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the allowable PM emission rate from the one (1) granulator, identified as EU-01, the one (1) dryer, identified as EU-02, and the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05 shall not exceed 40.04 pounds per hour, each, when operating at a process weight rate of 30 tons per hour, **each**.

...

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

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A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ 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.**

...

D.1.5 Visible Emissions Notations

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- (a) Visible emission notations of ~~each scrubber and baghouse~~ **the Stack S1, Stack S2, and general ventilation system** stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.1.6 Wet Scrubber Parametric Monitoring

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

- (a) When for any one reading, the flow rate of the scrubber is less than the normal minimum of 175 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps ~~in accordance with Section C - Response to Excursions or Exceedances.~~
- (b) When for any one reading, the flow rate of the make-up water is less than the normal minimum of 6.0 gallons per minute, or a minimum established during the latest stack test,

~~the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.~~

- (c) When for any one reading, the pressure drop across the scrubber, identified as WS1, is outside the normal range of 0.5 to 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps ~~in accordance with Section C – Response to Excursions or Exceedances.~~
- (d) When for any one reading, the pressure drop across the scrubber, identified as WS2, is outside the normal range of 7.0 to 13.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps ~~in accordance with Section C – Response to Excursions or Exceedances.~~

A pressure reading that is outside the above mentioned range or a flow rate that is below the above mentioned minimum is not a deviation from this permit. Failure to take response steps in ~~accordance with Section C – Response to Excursions or Exceedances~~ shall be considered a deviation from this permit. **Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition.**

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

#### D.1.7 **Scrubber** Failure Detection

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In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). ~~Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

#### D.1.8 **Baghouse** Parametric Monitoring

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- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05, at least once per day when the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05 is in operation. When for any one reading, the pressure drop across the baghouse identified as BH1 is outside the normal range of 7.0 and 14.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps ~~in accordance with Section C – Response to Excursions or Exceedances.~~ A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C – Response to Excursions or Exceedances~~ shall be considered a deviation from this permit. **Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition.**
- (b) **The Permittee shall record the pressure drop across the baghouse used in conjunction with the dryer, identified as EU-02. When for any one reading, the pressure drop across the baghouse identified as BH2 is outside the normal range of 4.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C –**

**Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.**

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.1.9 Broken or Failed Bag Detection**

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~~In the event that bag failure has been observed:~~

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

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

**D.1.10 Cyclone Failure Detection**

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~~In the event that cyclone failure has been observed:~~

~~Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C -~~

~~Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

#### D.1.11 Record Keeping Requirements

- (a) To document **the compliance status** with Conditions D.1.1(a) and D.1.1(b), the Permittee shall maintain records of the throughput of granulated lime to the fertilizer production line.
- (b) To document **the compliance status** with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of each scrubber and baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (c) To document **the compliance status** with Conditions D.1.6, the Permittee shall maintain a daily record of the liquid flow rate and the pressure drop as well as the flow rate of scrubbant and make-up water across the two (2) scrubbers, identified as WS1 and WS2 used in conjunction with the one (1) fertilizer production line. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not operate that day).
- (d) To document **the compliance status** with Conditions D.1.8(a), the Permittee shall maintain a daily record of the pressure drop across the baghouse used in conjunction with the one (1) screen and classifying process of granulated lime, consisting of product sizing and transfer, identified as EU-05. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not operate that day).
- (e) **To document the compliance status with Conditions D.1.8(b), the Permittee shall maintain a daily record of the pressure drop across the baghouse used in conjunction with the dryer, identified as EU-02. The Permittee shall include in its daily record when a reading is not taken and the reason for the lack of a reading, (i.e. the process did not operate that day).**
- (e)(f) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **contains the Permittee's obligations with regard to the records required by this condition.**

...

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

...

Attach a signed certification to complete this report.

#### Conclusion and Recommendation

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 September 23, 2011.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 071-30961-00013. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**SUMMARY OF EMISSIONS**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Address City IN Zip:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Pit ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

Uncontrolled / Unlimited Emissions (Tons/Yr)									
Pollutant	Granulator EU 01	Dryer EU-02	Burner EU-04	Screen and Classifying EU-05	Crushing Operation	Insignificant Boiler	Unpaved Roads (Fugitive)	Paved Roads (Fugitive)	Total
PM	199.73	328.50	0.21	7.88	0.74	0.01	79.71	2.13	537.07
PM10	199.73	328.50	0.83	7.88	0.74	0.03	20.32	0.43	537.72
PM2.5	199.73	328.50	0.83	7.88	0.74	0.03	2.03	0.10	537.72
VOC	-	-	0.60	-	-	0.02	-	-	0.63
NOx	-	-	10.95	-	-	0.41	-	-	11.36
SO2	-	-	0.07	-	-	2.48E-03	-	-	0.07
CO	-	-	9.20	-	-	0.35	-	-	9.55
GHGs as CO2e	-	-	13,220	-	-	500	-	-	13,720
Single HAP (Hexane)	-	-	0.20	-	-	0.01	-	-	0.20
Combined HAPs	-	-	0.21	-	-	0.01	-	-	0.21

Controlled / Unlimited Emissions (Tons/Yr)									
Pollutant	Granulator EU 01	Dryer EU-02	Burner EU-04	Screen and Classifying EU-05	Crushing Operation	Insignificant Boiler	Unpaved Roads (Fugitive)	Paved Roads (Fugitive)	Total
PM	12.98	21.35	0.21	0.51	0.74	0.01	39.86	1.07	35.81
PM10	12.98	21.35	0.83	0.51	0.74	0.03	10.16	0.21	36.46
PM2.5	12.98	21.35	0.83	0.51	0.74	0.03	1.02	0.05	36.46
VOC	-	-	0.60	-	-	0.02	-	-	0.63
NOx	-	-	10.95	-	-	0.41	-	-	11.36
SO2	-	-	0.07	-	-	2.48E-03	-	-	0.07
CO	-	-	9.20	-	-	0.35	-	-	9.55
GHGs as CO2e	-	-	13,220	-	-	500	-	-	13,720
Single HAP (Hexane)	-	-	0.20	-	-	0.01	-	-	0.20
Combined HAPs	-	-	0.21	-	-	0.01	-	-	0.21

Limited / Uncontrolled Emissions (Tons/Yr)									
Pollutant	Granulator EU 01	Dryer EU-02	Burner EU-04	Screen and Classifying EU-05	Crushing Operation	Insignificant Boiler	Unpaved Roads (Fugitive)	Paved Roads (Fugitive)	Total
PM	60.58	29.70	0.21	7.88	0.74	0.01	39.86	1.07	99.12
PM10	60.58	29.70	0.83	7.88	0.74	0.03	10.16	0.21	99.76
PM2.5	60.58	29.70	0.83	7.88	0.74	0.03	1.02	0.05	99.76
VOC	-	-	0.60	-	-	0.02	-	-	0.63
NOx	-	-	10.95	-	-	0.41	-	-	11.36
SO2	-	-	0.07	-	-	2.48E-03	-	-	0.07
CO	-	-	9.20	-	-	0.35	-	-	9.55
GHGs as CO2e	-	-	13,220	-	-	500	-	-	13,720
Single HAP (Hexane)	-	-	0.20	-	-	0.01	-	-	0.20
Combined HAPs	-	-	0.21	-	-	0.01	-	-	0.21

**Appendix A: Emissions Calculations  
Particulate Emissions from EU-01 Granulator**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Address City IN Zip:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Plt ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

Emission Unit	Particulate Emission Factor (lbs/ton)	Process Weight (tons/hr)	Control Efficiency (%)	Potential to Emit Before Controls		Potential to Emit After Controls	
				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
EU-01	1.52	30	93.5%	45.6	199.73	2.96	12.98

**Notes:**

Emission Factor is from AP-42 section 8.5.3.3, Table 8.5.3-1 (Ammonium Phosphate)  
 Assumed PM = PM10 = PM2.5

**Methodology:**

Potential to Emit Before Controls (lbs/hr) = Particulate Emission Factor (lbs/ton) \* Process Weight (tons/hr)  
 Potential to Emit After Controls (lbs/hr) = Potential to Emit Before Control (lbs/hr) \* (1 - Control Efficiency (%))  
 Potential to Emit (tons/hr) = Potential to Emit (lbs/hr) \* 8,760 hrs / 2,000 lbs

**Appendix A: Emissions Calculations  
Process Particulate Emissions from EU-02 Dryer**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Address City IN Zip:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Plt ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

Emission Unit	Particulate Emission Factor (lbs/ton)	Process Weight (tons/hr)	Control Efficiency (%)	Potential to Emit Before Controls		Potential to Emit After Controls	
				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
EU-02	1.50	50	93.5%	75	328.50	4.88	21.35

**Notes:**

Emission Factor is from AP-42 section 8.5.3.3, Table 8.5.3-1 (Ammonium Phosphate)

Assumed PM = PM10 = PM2.5

Control Efficiency = Overall Efficiency from BH2, Cycl1 / Cycl1A, and WS2.

**Methodology:**

Potential to Emit Before Controls (lbs/hr) = Particulate Emission Factor (lbs/ton) \* Process Weight (tons/hr)

Potential to Emit After Controls (lbs/hr) = Potential to Emit Before Control (lbs/hr) \* (1 - Control Efficiency (%))

Potential to Emit (tons/hr) = Potential to Emit (lbs/hr) \* 8,760 hrs / 2,000 lbs

**Appendix A: Emissions Calculations**  
**EU-04 Burner Natural Gas Combustion**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Address City IN Zip:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Pit ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

25.00

219.00

**Criteria Pollutant Emissions**

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.21	0.83	0.83	0.07	10.95	0.60	9.20

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology:**

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

**Hazardous Air Pollutant Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.300E-04	1.314E-04	8.213E-03	0.20	3.723E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.475E-05	1.205E-04	1.533E-04	4.161E-05	2.300E-04

Combined HAPs: 0.21

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

**Greenhouse Gas Emissions**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	13,140	0.3	0.2
Summed Potential Emissions in tons/yr	13,140		
CO2e Total in tons/yr	13,220		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations**  
**Particulate Emissions from EU-05 Screen and Classifying Process**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Address City IN Zip:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Plt ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

Emission Unit	Particulate Emission Factor (lbs/ton)	Process Weight (tons/hr)	Control Efficiency (%)	Potential to Emit Before Controls		Potential to Emit After Controls	
				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
EU-05	0.06	30	93.5%	1.80	7.88	0.12	0.51

**Notes:**

Emission Factor is from AP-42 section 8.5.3.3, Table 8.5.3-1 (Ammonium Phosphate)

Assumed PM = PM10 = PM2.5

**Methodology:**

Potential to Emit Before Controls (lbs/hr) = Particulate Emission Factor (lbs/ton) \* Process Weight (tons/hr)

Potential to Emit After Controls (lbs/hr) = Potential to Emit Before Control (lbs/hr) \* (1 - Control Efficiency (%))

Potential to Emit (tons/hr) = Potential to Emit (lbs/hr) \* 8,760 hrs / 2,000 lbs

**Appendix A: Emissions Calculations**  
**Particulate Emissions from the Crushing Operation**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Address City IN Zip:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Plt ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

Emission Unit	Process Weight (tons/hr)	Emission Factor (lbs/ton)	Control Efficiency (%)	Potential Emissions	
				(lbs/hr)	(tons/yr)
Crushing Operation	10	0.017	0.00%	0.17	0.74

**Note:**

Emission factor used is for Lime Crushing, from AP-42 Chapter 11.17, Table 11.17-4

**Methodology:**

Potential Emissions (lbs/hr) = Process Weight Rate (tons/hr) \* Emission Factor (lbs/ton)

Potential Emissions (tons/yr) = Potential Emissions (lbs/hr) \* 8,760 hrs / 2,000 lbs

**Appendix A: Emissions Calculations**  
**EU-02 Dryer Natural Gas Combustion**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Address City IN Zip:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Pit ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.95

8.28

**Criteria Pollutant Emissions**

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.03	0.03	0.00	0.41	0.02	0.35

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

**Hazardous Air Pollutant Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	8.692E-06	4.967E-06	3.104E-04	7.45E-03	1.407E-05

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

Combined HAPs: 0.01

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Emissions**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	497	0.0	0.0
Summed Potential Emissions in tons/yr	497		
CO2e Total in tons/yr	500		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Unpaved Roads**

Company Name: The Andersons, Inc. Seymour Wholesale Terminal  
Address City IN Zip: 101 Agrico Lane, Seymour, Indiana 47274  
Permit Number: 071-30961-00013  
Pit ID: 071-00013  
Reviewer: Jason R. Krawczyk  
Date: November 1, 2011

**Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	125.0	1.0	125.0	15.0	1875.0	2006	0.380	47.5	17337.5
Vehicle (leaving plant) (one-way trip)	125.0	1.0	125.0	40.0	5000.0	2006	0.380	47.5	17337.5
<b>Total</b>			<b>250.0</b>		<b>6875.0</b>			<b>95.0</b>	<b>34675.0</b>

Average Vehicle Weight Per Trip =  $\frac{27.5}{0.38}$  tons/trip  
Average Miles Per Trip =  $\frac{0.38}{0.38}$  miles/trip

Unmitigated Emission Factor,  $E_f = K \cdot [(s/12)^a] \cdot [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	27.5	27.5	27.5	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$  (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor,  $E_{ext} = \frac{E \cdot [(365 - P)/365]}{125}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	6.99	1.78	0.18	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	4.60	1.17	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	60.62	15.45	1.54	39.86	10.16	1.02	19.93	5.08	0.51
Vehicle (leaving plant) (one-way trip)	60.62	15.45	1.54	39.86	10.16	1.02	19.93	5.08	0.51
	<b>121.23</b>	<b>30.90</b>	<b>3.09</b>	<b>79.71</b>	<b>20.32</b>	<b>2.03</b>	<b>39.86</b>	<b>10.16</b>	<b>1.02</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particulate Matter (<2.5 um)  
PTE = Potential to Emit

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name:** The Andersons, Inc. Seymour Wholesale Terminal  
**Source Address:** 101 Agrico Lane, Seymour, Indiana 47274  
**Permit Number:** 071-30961-00013  
**Source ID:** 071-00013  
**Reviewer:** Jason R. Krawczyk  
**Date:** November 1, 2011

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	125.0	1.0	125.0	15.0	1875.0	106	0.020	2.5	912.5
Vehicle (leaving plant) (one-way trip)	125.0	1.0	125.0	40.0	5000.0	106	0.020	2.5	912.5
<b>Total</b>			<b>250.0</b>		<b>6875.0</b>			<b>5.0</b>	<b>1825.0</b>

Average Vehicle Weight Per Trip =  $\frac{27.5}{0.02}$  tons/trip  
 Average Miles Per Trip =  $\frac{27.5}{0.02}$  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	27.5	27.5	27.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = mean silt loading value for iron and steel production facilities- (Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = \frac{E_f * [1 - (p/4N)]}{N}$   
 where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	2.555	0.511	0.1255	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	2.337	0.467	0.1147	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.17	0.23	0.06	1.07	0.21	0.05	0.53	0.11	0.03
Vehicle (leaving plant) (one-way trip)	1.17	0.23	0.06	1.07	0.21	0.05	0.53	0.11	0.03
	<b>2.33</b>	<b>0.47</b>	<b>0.11</b>	<b>2.13</b>	<b>0.43</b>	<b>0.10</b>	<b>1.07</b>	<b>0.21</b>	<b>0.05</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particle Matter (<2.5 um)  
 PTE = Potential to Emit



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

**TO:** Melissa Farrington  
The Andersons, Inc. Seymour Wholesale Terminal  
PO Box 119  
Maumee, OH 43537

**DATE:** January 13, 2012

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

**SUBJECT:** Final Decision  
Significant Permit Revision  
071-30961-00013

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:  
Stacy Schmidt – Director Hazard Management  
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

*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)

January 13, 2012

TO: Jackson County 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. Seymour Wholesale Terminal**  
**Permit Number: 071-30961-00013**

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 1/13/2012 The Andersons, Inc. - Seymour Wholesale Terminal 071-30961-00013 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>	

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1		Melissa Farrington The Andersons, Inc. - Seymour Wholesale Terminal PO Box 119 Maumee OH 43537 (Source CAATS) via confirmed delivery										
2		Stacy Schmidt Dir - Hazard Mgmt The Andersons, Inc. - Seymour Wholesale Terminal PO Box 119 Maumee OH 43537 (RO CAATS)										
3		Jackson County Commissioner Jackson County Courthouse Brownstown IN 47220 (Local Official)										
4		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
5		Mr. Tome Earnhart 3960 N. CR 300 W. North Vernon IN 47265 (Affected Party)										
6		Mr. Rodney Farrow Farrow & Thompson P.O. Box 644 Seymour IN 47274-0644 (Affected Party)										
7		Seymour District Employees Indiana Dept. of Trans., Seymour District Office P.O. Box 550 Seymour IN 47274 (Affected Party)										
8		Seymour City Council and Mayors Office 301 North Chestnut Street Seymour IN 47274 (Local Official)										
9		Jackson County Health Department 801 West 2nd Street Seymour IN 47274-2711 (Health Department)										
10		Jackson Co Public Library 303 W 2nd Street Seymour IN 47274-2184 (Library)										
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