



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for The Andersons, Inc. Delphi Cob Operations in Carroll County

Significant Permit Revision No.: 015-43101-00035

The Indiana Department of Environmental Management (IDEM) has received an application from The Andersons, Inc. Delphi Cob Operations, located at 3902 North Anderson Drive, Delphi, IN 46923, for a significant revision of its FESOP issued on May 22, 2019. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow The Andersons, Inc. Delphi Cob Operations to make certain changes at its existing source. The Andersons, Inc. Delphi Cob Operations has applied to add new emission units.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Delphi Public Library
222 E Main St
Delphi, IN 46923

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM's website (<https://www.in.gov/idem/5474.htm>) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 015-43101-00035 in all correspondence.

Comments should be sent to:

Luda Lang
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Luda Lang or (317) 233-0863
Or dial directly: (317) 233-0863
Fax: (317) 232-6749 attn: Luda Lang
E-mail: LLang@idem.IN.gov

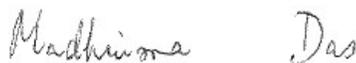
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Luda Lang or my staff at the above address.



Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

Mr. Adam Smith
The Andersons, Inc. Delphi Cob Operations
3902 North Anderson Drive,
Delphi, IN 46923

Re: 015-43101-00035
Significant Revision to
F015-41040-00035

Dear Mr. Smith:

The Andersons, Inc. Delphi Cob Operations was issued a Federally Enforceable State Operating Permit (FESOP) No. F015-41040-00035, on May 22, 2019, for a stationary corn cob processing facility, located at 3902 North Anderson Drive, Delphi, IN 46923. On July 31, 2020, the Office of Air Quality (OAQ) received an application from the source requesting approval to construct and operate new emission units. 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).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction at the source:

- (a) One (1) pellet mill and cooler, identified as PMC2, approved in 2020 for construction, with a maximum capacity of 7 tons per hour, with emissions controlled by a cyclone, identified as Cyclone #3A, and exhausting to stack CYC3A.
- (b) One (1) material handling system, consisting of totally enclosed conveyors, process lift fan and process cyclones/airlock in the pelletizing processing area, identified as CH-PELL, approved in 2020 for construction, with a maximum capacity of 7 tons per hour, with emissions controlled by baghouse, identified as Kice #1, and exhausting to stack BGH2.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this permit revision 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.

Effective Date of the Permit

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

DRAFT

Commenced Construction

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. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Luda Lang, 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) 233-0863 or (800) 451-6027, and ask for Luda Lang or (317) 233-0863.

Sincerely,

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Carroll County
Carroll County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

DRAFT

Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

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

(herein known as the Permittee) is hereby authorized to construct and 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.: F015-41040-00035	
Master Agency Interest ID: 6288	
Issued by: Original Signed By: Madhurima D. Moulik, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: May 22, 2019 Expiration Date: May 22, 2024

First Administrative Amendment No.: 015-42260-00035, issued on January 3, 2020;
Second Administrative Amendment No.: 015-42970-00035, issued on July 9, 2020;

Significant Permit Revision No.: 015-43101-00035	
Issued by: Madhurima D. Moulik, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: May 22, 2024

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15	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]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Source Modification Requirement [326 IAC 2-8-11.1]	
B.20	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]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	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]	
B.23	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	17
C.1	Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	19
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	20
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]	20
C.10	Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	
C.11	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]	
	Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]	20
C.12	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]	

C.13	Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.14	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	
	Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	22
C.15	General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]	
C.16	General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]	
	Stratospheric Ozone Protection	23
C.17	Compliance with 40 CFR 82 and 326 IAC 22-1	
	SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS	24
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	25
D.1.1	FESOP Limits [326 IAC 2-8-4]	
D.1.2	Particulate [326 IAC 6-3-2]	
D.1.3	Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
	Compliance Determination Requirements [326 IAC 2-8-4(1)]	26
D.1.4	Particulate control	
	Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]	26
D.1.5	Visible Emissions Notations	
D.1.6	Cyclone Failure Detection	
D.1.7	Cyclone Inspection	
	Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	27
D.1.8	Record Keeping Requirement	
	CERTIFICATION	28
	EMERGENCY OCCURRENCE REPORT	29
	QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT	31

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 corn cob processing facility.

Source Address:	3902 North Anderson Drive, Delphi, IN 46923
General Source Phone Number:	419-891-2951
SIC Code:	2041 (Flour and Other Grain Mill Products)
County Location:	Carroll
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) cob receiving station (truck), identified as CR1, constructed prior to 1987, permitted in 2007, and modified in 2017, with a maximum capacity of 20 tons of cobs per hour, with emissions controlled by a cyclone, identified as Cyclone #1, and exhausting to stack CYC1.
- (b) Bulk material outdoor storage, identified as SP1, consisting of five (5) temporary outdoor cob storage piles, identified as SP1, constructed prior to 1987, permitted in 2007, and modified in 2017, with a maximum capacity of 40 tons of cobs per hour, using no control.
- (c) One (1) natural gas-fired cob dryer, identified as CD1, constructed prior to 1987, permitted in 2007, and modified in 2017, with a maximum capacity of 20 tons of cobs per hour, with dryer burners having a maximum heat input capacity of 10.0 MMBtu/hour of natural gas, using a cyclone, identified as Cyclone #4 for particulate control and exhausting to stack CYC4.
- (d) Two (2) fully enclosed cob hammermills, identified as HM1 (RIP) and HM2 (RIP), constructed prior to 1987, permitted in 2007, and modified in 2017 with the ground corn cobs pneumatically conveyed to a storage silo (Silo1), with a maximum capacity of 20 tons of cobs per hour each, with emissions controlled by a baghouse, identified as RIP Baghouse, and exhausting to stack BGH1.
- (e) One (1) fully enclosed cob hammermill, identified as HM3 (GRIT), constructed prior to 1987, permitted in 2007, modified in 2017, and approved in 2019 for modification, with a maximum capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BGH3.
- (f) Two (2) fully enclosed cob hammermills, identified HM4 (GRIT) and HM9 (GRIT), approved in 2019 for construction, with a maximum capacity of 6 tons of cobs per hour each, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BGH3.

- (g) One (1) cob handling system, consisting of totally enclosed legs, totally enclosed sifters, process cyclones, process lift fans, conveyors and cleaners, in the RIP processing area, identified as CH-RIP, constructed prior to 1987, permitted in 2007, and modified in 2019, as a unit CH1, modified in 2020, with a maximum capacity of 20 tons of cobs per hour, with emissions controlled by a cyclone, identified as a Cyclone #2 and a baghouse, identified as RIP Baghouse, and exhausting to stack BGH1.
- (h) One (1) cob handling system, consisting of totally enclosed legs, totally enclosed sifters, process cyclones, conveyors and cleaners, in the GRIT processing area, identified as CH-GRIT, constructed prior to 1987, permitted in 2007, and modified in 2019, as a unit CH1, with a maximum capacity of 20 tons of cobs per hour, with emissions controlled by two (2) baghouses, identified as Kice #1 and Kice #2 Baghouses, and exhausting to stacks BGH2 and BGH3.
- (i) Seventeen (17) dry storage bins for storing ground corn cobs, identified as Storage Bins 1, constructed prior to 1987, permitted in 2007, and modified in 2017, as unit Storage 1, with a maximum capacity of 20 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #1 Baghouse, and exhausting to stack BGH2.
- (j) Six (6) packing bins for storing ground corn cobs just prior to packaging or bagging, identified as Packing Bins 1, constructed prior to 1987, permitted in 2007, and modified in 2017 as unit Storage 1, with a maximum capacity of 15 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BGH3.
- (k) One (1) cob packaging system including a gross bagger, identified as CP_Bagger, constructed prior to 1987, permitted in 2007, and modified in 2017 as unit CS1, with a maximum capacity of 30 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #1 Baghouse, and exhausting to stack BGH2.
- (l) One (1) cob shipping station(truck and rail), identified as S1, constructed prior to 1987, permitted in 2007, and modified in 2017 as unit CS1, with a maximum capacity of 30 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #1 Baghouse, and exhausting to stack BGH2.
- (m) One (1) fully enclosed cob hammermill, identified as RB HM (RIP), constructed prior to 1987, permitted in 2019, with a maximum capacity of 10 tons of cobs per hour, with emissions controlled by a baghouse, identified as RIP Baghouse, and exhausting to stack BGH1.
- (n) Four (4) fully enclosed cob hammermills, identified as HM Bliss (4's)), HM6 (GRIT), HM7 (4's), HM8 (4's), constructed prior to 1987, permitted in 2019, with a maximum capacity of 6 tons of cobs per hour each, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BGH3.
- (o) Six (6) dry storage bins, identified as Storage Bins 2, consisting of the following:
 - (1) Two (2) storage bins, identified as bin 1 and bin 2, constructed in 2020, with a maximum capacity of 20 tons of cobs per hour, each, using bin vent filters as control and exhausting to bin vents SB2-1 and SB2-2, respectively;
 - (2) One (1) storage bin, identified as bin 3, constructed in 2020, with a maximum capacity of 3.5 tons of cobs per hour, using bin vent filters as control, and exhausting to bin vent SB2-3 ;

- (3) One (1) storage bin, identified as bin 4, constructed in 2020, with a maximum capacity of 3.5 tons of cobs per hour, using no control. Bin 4 is a closed loop system and has no exhaust.
- (4) Two (2) storage bins, identified as Bin 8 and Bin 11, constructed in 2019 and 2010, with a total maximum capacity of 20 tons of cobs per hour, Bins 8 and 11 are closed loop systems and have no exhaust.
- (p) Five (5) wet storage bins, identified as Storage Bins 3, constructed prior to 1987, permitted in 2019, with a maximum capacity of 20 tons of cobs per hour, using no control, and exhausting to stacks SB3-1 through SB3-5.
- (q) One (1) pellet mill and cooler, identified as PMC2, approved in 2020 for construction, with a maximum capacity of 7 tons of cobs per hour, with emissions controlled by a cyclone, identified as Cyclone #3A, and exhausting to stack CYC3A.
- (r) One (1) material handling system, consisting of totally enclosed conveyors, process lift fan and process cyclones/airlock in the pelletizing processing area, identified as CH-PELL, approved in 2020 for construction, with a maximum capacity of 7 tons per hour, with emissions controlled by baghouse, identified as Kice #1, and exhausting to stack BGH2.
- (s) One (1) shipping - whole cob truck loading system, identified as S2, constructed prior to 1987, permitted in 2019, with a maximum capacity of 30 tons of cobs per hour, using no control, and exhausting to stack S2-V.
- (t) One (1) shipping - reed tank loading system, identified as S3, constructed prior to 1987, permitted in 2019, with a maximum capacity of 30 tons of cobs per hour, using no control, and exhausting to stack S3-V.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) cat litter bin, identified as CL Bin, constructed prior to 1987, with a maximum capacity of 0.5 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BH3.
- (b) One (1) cat litter bulk bag, identified as CL Bagger, constructed prior to 1987, with a maximum capacity of 0.5 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BH3.
- (c) One (1) diesel storage tank for fuel dispensing, identified as DT1, constructed prior to 1987, with a maximum capacity of 1000 gallons, using no control, and exhausting to stack DT1-V.
- (d) One (1) mineral oil storage tank, identified as MT1, constructed prior to 1987, with a maximum capacity of 2000 gallons, using no control, and exhausting to stack MT1-V.
- (e) One (1) mineral oil storage tank, identified as MT2, constructed in 2019, with a maximum capacity of 8000 gallons, using no control, and exhausting to stack MT2-V.
- (f) Paved and unpaved roads and parking lots with public access

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F015-41040-00035, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5 (f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [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.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. 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) 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.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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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.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)]

- (a) If required by specific condition(s) in Section D of this permit, 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.

- (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. 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).
- (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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
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 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F015-41040-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require 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.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). 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.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
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.18 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) and (c) 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 5
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)(1) and (c). 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)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
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(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 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.21 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.22 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.23 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), 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) 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]

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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.8 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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).

C.11 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. The analog instrument shall be capable of measuring values outside of the normal range.
- (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.12 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.13 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.14 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 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.15 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. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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.16 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. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 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:

- (a) One (1) cob receiving station (truck), identified as CR1, constructed prior to 1987, permitted in 2007, and modified in 2017, with a maximum capacity of 20 tons of cobs per hour, with emissions controlled by a cyclone, identified as Cyclone #1, and exhausting to stack CYC1.
- (c) One (1) natural gas-fired cob dryer, identified as CD1, constructed prior to 1987, permitted in 2007, and modified in 2017, with a maximum capacity of 20 tons of cobs per hour, with dryer burners having a maximum heat input capacity of 10.0 MMBtu/hour of natural gas, using a cyclone, identified as Cyclone #4 for particulate control and exhausting to stack CYC4.
- (d) Two (2) fully enclosed cob hammermills, identified as HM1 (RIP) and HM2 (RIP), constructed prior to 1987, permitted in 2007, and modified in 2017 with the ground corn cobs pneumatically conveyed to a storage silo (Silo1), with a maximum capacity of 20 tons of cobs per hour each, with emissions controlled by a baghouse, identified as RIP Baghouse, and exhausting to stack BGH1.
- (e) One (1) fully enclosed cob hammermill, identified as HM3 (GRIT), constructed prior to 1987, permitted in 2007, modified in 2017, and approved in 2019 for modification, with a maximum capacity of 6 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BGH3.
- (f) Two (2) fully enclosed cob hammermills, identified HM4 (GRIT) and HM9 (GRIT), approved in 2019 for construction, with a maximum capacity of 6 tons of cobs per hour each, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BGH3.
- (g) One (1) cob handling system, consisting of totally enclosed legs, totally enclosed sifters, process cyclones, conveyors and cleaners, in the RIP processing area, identified as CH-RIP, constructed prior to 1987, permitted in 2007, and modified in 2019, as a unit CH1, with a maximum capacity of 20 tons of cobs per hour, with emissions controlled by a cyclone, identified as a Cyclone #2 and a baghouse, identified as RIP Baghouse, and exhausting to stack BGH1.
- (h) One (1) cob handling system, consisting of totally enclosed legs, totally enclosed sifters, process cyclones, conveyors and cleaners, in the GRIT processing area, identified as CH-GRIT, constructed prior to 1987, permitted in 2007, and modified in 2019, as a unit CH1, with a maximum capacity of 20 tons of cobs per hour, with emissions controlled by two (2) baghouses, identified as Kice #1 and Kice #2 Baghouses, and exhausting to stacks BGH2 and BGH3.
- (k) One (1) cob packaging system including a gross bagger, identified as CP_Bagger, constructed prior to 1987, permitted in 200, and modified in 2017 as unit CS1, with a maximum capacity of 30 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #1 Baghouse, and exhausting to stack BGH2.
- (l) One (1) cob shipping station(truck and rail), identified as S1, constructed prior to 1987, permitted in 2007, and modified in 2017 as unit CS1, with a maximum capacity of 30 tons of cobs per hour, with emissions controlled by a baghouse, identified as Kice #1 Baghouse, and exhausting to stack BGH2.
- (m) One (1) fully enclosed cob hammermill, identified as RB HM (RIP), constructed prior to 1987, permitted in 2019, with a maximum capacity of 10 tons of cobs per hour, with emissions controlled by a baghouse, identified as RIP Baghouse, and exhausting to stack BGH1.

- (n) Four (4) fully enclosed cob hammermills, identified as HM Bliss (4's), HM6 (GRIT), HM7 (4's), HM8 (4's), constructed prior to 1987, permitted in 2019, with a maximum capacity of 6 tons of cobs per hour each, with emissions controlled by a baghouse, identified as Kice #2 Baghouse, and exhausting to stack BGH3.
- (q) One (1) pellet mill and cooler, identified as PMC2, approved in 2020 for construction, with a maximum capacity of 7 tons of cobs per hour, with emissions controlled by a cyclone, identified as Cyclone #3A, and exhausting to stack CYC3A.
- (s) One (1) shipping - whole cob truck loading system, identified as S2, constructed prior to 1987, permitted in 2019, with a maximum capacity of 30 tons of cobs per hour, using no control, and exhausting to stack S2-V.
- (t) One (1) shipping - reed tank loading system, identified as S3, constructed prior to 1987, permitted in 2019, with a maximum capacity of 30 tons of cobs per hour, using no control, and exhausting to stack S3-V.

(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 Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the PM, PM10, and PM2.5 emissions from Pellet mill, cooler (PMC2) shall not exceed the emissions limits listed in the table below:

Facility / Control Device(s)	PM Limit (lbs/hr)	PM10 Limit (lbs/hr)	PM2.5 Limit (lbs/hr)
Pellet mill, cooler (PMC2) / Cyclone #3A	2.52	2.52	2.52

Compliance with these limits, combined with the potential to emit PM, PM10, 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 one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the facilities listed in the following table shall not exceed the pound per hour value when operating at the specified process weight rate:

Summary of Process Weight Rate Limits				
Process / Emission Unit	P (ton/hr)	326 IAC 6-3-2 Allowable PM Emission Rate, E (lb/hr)	Uncontrolled PM Emissions, (lb/hr)	Controlled PM Emissions (lb/hr)
Receiving Truck / CR1	20	30.51	3.60	0.54
Cob Handling System / CH-RIP	20	30.51	1.22	0.12
Cob Handling System /CH-GRIT	20	30.51	1.22	0.12
Hammer Milling / HM1 (RIP)	20	30.51	2.40	0.24
Hammer Milling / HM2 (RIP)	20	30.51	2.40	0.24

Summary of Process Weight Rate Limits				
Process / Emission Unit	P (ton/hr)	326 IAC 6-3-2 Allowable PM Emission Rate, E (lb/hr)	Uncontrolled PM Emissions, (lb/hr)	Controlled PM Emissions (lb/hr)
Hammer Milling / RB HM (RIP)	10	19.18	1.20	0.12
Hammer Milling / HM3 (GRIT)	6	13.62	0.72	0.07
Hammer Milling / HM4 (GRIT)	6	13.62	0.72	0.07
Hammer Milling / HMBLiss (4's)	6	13.62	0.72	0.07
Hammer Milling / HM6 (GRIT)	6	13.62	0.72	0.07
Hammer Milling / HM7 (4's)	6	13.62	0.72	0.07
Hammer Milling / HM8 (4's)	6	13.62	0.72	0.07
Hammer Milling / HM9 (GRIT)	6	13.62	0.72	0.07
Pellet Mill, Cooler / (PMC2)	7	15.10	16.80	2.52
Cob Dryer / CD1	20	30.51	4.40	0.66
Cob Packaging / CP_Bagger	30	40.04	2.58	0.26
Shipping / S1	30	40.04	2.58	0.26
Shipping / S2	30	40.04	2.58	2.58
Shipping / S3	30	40.04	2.58	2.58

These limitations are based on the following equation:

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

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

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 [326 IAC 2-8-4(1)]

D.1.4 Particulate control

- (a) In order to assure compliance with Conditions D.1.1 and D.1.2, one (1) cyclone (Cyclone #3A) for particulate control shall be in operation and control emissions from the Pellet mill, cooler (PMC2) at all times that the Pellet mill, cooler (PMC2) is in operation.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of one (1) cyclone (Cyclone #3A) stack exhausts 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 a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process will be shut down immediately until the failed unit has 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).
- (b) For a cyclone 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).

D.1.7 Cyclone Inspection

The Permittee shall perform semi-quarterly inspection of the of one (1) cyclone (Cyclone #3A) controlling particulate from the Pellet mill, cooler (PMC) to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.1.8 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the cyclone(s) 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 (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: The Andersons, Inc. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
FESOP Permit No.: F015-41040-00035

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. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
FESOP Permit No.: F015-41040-00035

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime 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 2-8-12 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**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. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
FESOP Permit No.: F015-41040-00035

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**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. Delphi Cob Operations
Source Location:	3902 North Anderson Drive, Delphi, IN 46923
County:	Carroll
SIC Code:	2041 (Flour and Other Grain Mill Products)
Operation Permit No.:	F 015-41040-00035
Operation Permit Issuance Date:	May 22, 2019
Significant Permit Revision No.:	015-43101-00035
Permit Reviewer:	Luda Lang

Existing Approvals

The source was issued FESOP No. 015-41040-00035 on May 22, 2019. The source has since received the following approvals:

- (a) FESOP Administrative Amendment No. 015-42260-00035, issued on January 3, 2020; and
- (b) FESOP Administrative Amendment No. 015-42970-00035, issued on July 9, 2020.

County Attainment Status

The source is located in Carroll County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Carroll County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Carroll County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
 Carroll County has been classified as attainment or unclassifiable in Indiana for all the other 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 (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - 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. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions After Issuance (ton/year)								Total HAPs
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	
Total PTE of Entire Source Excluding Fugitives*	160.88	93.56	65.47	0.03	4.29	0.24	3.61	0.08 (Hexane)	0.08

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP
 *Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (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(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions 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.
- (c) These emissions are based on the TSD of FESOP AA No. 015-42970-00035, issued on July 9, 2020.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by The Andersons, Inc. Delphi Cob Operations on July 31, 2020, relating to the construction and operation of new emission units.

The following is a list of the new emission units and pollution control device(s):

- (a) One (1) pellet mill and cooler, identified as PMC2, approved in 2020 for construction, with a maximum capacity of 7 tons per hour, with emissions controlled by a cyclone, identified as Cyclone #3A, and exhausting to stack CYC3A;
- (b) One (1) material handling system, consisting of totally enclosed conveyors, process lift fan and process cyclones/airlock in the pelletizing processing area, identified as CH-PELL, approved in 2020 for construction, with a maximum capacity of 7 tons per hour, with emissions controlled by baghouse, identified as Kice #1, and exhausting to stack BGH2.

As part of this permitting action, the following emission units are being removed the permit:

- (a) One (1) pellet mill and cooler, identified as PMC, constructed prior to 1987, permitted in 2019, with a maximum capacity of 7 tons of cobs per hour, with emissions controlled by a cyclone, identified as Cyclone #3, and exhausting to stack CYC3.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – FESOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
Pelletizing Handling System (CH-PELL)	1.87	1.04	0.18	-	-	-	-	-	-
Pellet Mill/Cooler (PMC2)	73.58	73.58	73.58	-	-	-	-	-	-
Total PTE Before Controls of the New Emission Units:	75.45	74.63	73.76	-	-	-	-	-	-

¹PM_{2.5} listed is direct PM_{2.5}.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:

- (i) PM, PM₁₀, or direct PM_{2.5}.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	162.75	94.60	65.65	0.03	4.29	0.24	3.61	0.08 (Hexane)	0.08

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP *Fugitive HAP emissions are always included in the source-wide emissions.									

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take PM₁₀, PM_{2.5} limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

- (a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).
- (b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD and 326 IAC 12, are still not included in the permit for this source, since although this source was constructed after August 3, 1978, it is not a grain terminal elevator or grain storage elevator, since the source is processing corncob, nut shells (peanut, walnut etc.) and hemp, which are not considered a grain, as defined by §60.301 (a).
- (b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD are still not included in the permit for this source, since this source is not considered a prepared feeds manufacturing facility as defined by §63.11627 and does not use a material containing chromium or manganese.

- (d) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited 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.

State Rule Applicability - Entire Source

Due to this revision, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

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

The new emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

FESOP PM/ PM10/ PM2.5 Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

Facility / Control Device(s)	PM Limit (lbs/hr)	PM10 Limit (lbs/hr)	PM2.5 Limit (lbs/hr)
Pellet mill, cooler (PMC2) / Cyclone #3A	2.52	2.52	2.52

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM 2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Carroll County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Carroll County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Due to the proposed revision, state rule applicability has been reviewed as follows:

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

Pursuant to 326 IAC 6-3-2(b), the new pelletizing handling system (CH-PELL) is not subject to the requirements of 326 IAC 6-3-2 since it has particulate emissions of less than 0.551 pounds per hour.

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the units listed in the table below, since each is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the units listed below shall not exceed the allowable emissions rate specified in the table below. The pound per hour limitation was calculated with the following equation:

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

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

Summary of Process Weight Rate Limits				
Process / Emission Unit	P (ton/hr)	326 IAC 6-3-2 Allowable PM Emission Rate, E (lb/hr)	Uncontrolled PM Emissions, (lb/hr)	Controlled PM Emissions (lb/hr)
Pellet Mill, Cooler / (PMC2)	7	15.10	16.80	2.52

Based on calculations, the control equipment, associated with pellet mill and cooler PMC2 shall be in operation at all times the PMC2 is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

- (a) The Compliance Determination Requirements applicable to this revision are as follows:

Pellet mill, cooler (PMC2) have applicable compliance determination conditions as specified below:

- (1) In order to comply with the limits in the permit, the control equipment for particulate control shall be in operation at all times that the facilities are in operation.

There are no compliance determination requirements for other emission units.

Testing Requirements:

- (1) IDEM OAQ has determined that testing of the pellet mill and cooler (PMC2), controlled by cyclone, identified as Cyclone #3A is not required at this time to determine compliance with the PM10/PM2.5 emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.
- (2) Testing of the material handling operation CH-PELL, controlled by a baghouse, identified as Kice#1 for PM/PM10/PM2.5 is not required, because the baghouse Kice #1 is not required to comply with any applicable requirements.

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

Control Device / Stack ID	Type of Parametric Monitoring	Frequency	Range or Specification
Cyclone #3A / CYC3A	Visible Emissions Notations	Daily	Normal or Abnormal
Cyclone #3A / CYC3A	Cyclone Inspection	Semi-quarterly	Operated and maintained per manufacturer's specifications

These monitoring conditions are necessary because the Cyclone #3A for the pellet mill and cooler (PMC2) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes), 326 IAC 2-8 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70) not applicable.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) Sections A.2 and D.1 of the Permit have been revised to incorporate the new emission units and control device.

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:

- (q) One (1) pellet mill and cooler, identified as PMC2, ~~constructed prior to 1987, permitted in 2019~~ **approved in 2020 for construction**, with a maximum capacity of 7 tons of cobs per hour, with emissions controlled by a cyclone, identified as Cyclone #3A, and exhausting to stack CYC3A.
- (r) **One (1) material handling system, consisting of totally enclosed conveyors, process lift fan and process cyclones/airlock in the pelletizing processing area, identified as CH-PELL, approved in 2020 for construction, with a maximum capacity of 7 tons per hour, with emissions controlled by baghouse, identified as Kice #1, and exhausting to stack BGH2.**

(f)(s) ..
 (s)(t) ...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(q) One (1) pellet mill and cooler, identified as **PMC2**, ~~constructed prior to 1987, permitted in 2019~~ **approved in 2020 for construction**, with a maximum capacity of 7 tons of cobs per hour, with emissions controlled by a cyclone, identified as **Cyclone #3A**, and exhausting to stack **CYC3A**.

(f)(s) ..

(s)(t) ...

(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 Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the PM, PM10, and PM2.5 emissions from Pellet mill, cooler (PMC2) shall not exceed the emissions limits listed in the table below:

Facility / Control Device(s)	PM Limit (lbs/hr)	PM10 Limit (lbs/hr)	PM2.5 Limit (lbs/hr)
Pellet mill, cooler (PMC2) / Cyclone #3A	2.52	2.52	2.52

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the facilities listed in the following table shall not exceed the pound per hour value when operating at the specified process weight rate:

Summary of Process Weight Rate Limits				
Process / Emission Unit	P (ton/hr)	326 IAC 6-3-2 Allowable PM Emission Rate, E (lb/hr)	Uncontrolled PM Emissions, (lb/hr)	Controlled PM Emissions (lb/hr)
Pellet Mill, Cooler / (PMC2)	7	15.10	16.80	2.52

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.4 Particulate control

- (a) In order to assure compliance with Conditions D.1.1 and D.1.2, one (1) cyclone (Cyclone #3A) for particulate control shall be in operation and control emissions from the Pellet mill, cooler (PMC2) at all times that the Pellet mill, cooler (PMC2) is in operation.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of one (1) cyclone (Cyclone #3A) stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

D.1.7 Cyclone Inspection

The Permittee shall perform semi-quarterly inspection of the of one (1) cyclone (Cyclone #3A) controlling particulate from the Pellet mill, cooler (PMC2) to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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 July 31, 2020.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 015-43101-0863. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Luda Lang, 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) 233-0863 or (800) 451-6027, and ask for Luda Lang or (317) 233-0863.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emission Calculations
PTE Summary

Company Name: The Andersons, Inc. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
Permit Number: F015-41040-00035
SPR Number: 015-43101-00035
Reviewer: Luda Lang

Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Single HAP Hexane)	Total HAPs
Receiving Station (Truck) (CR1)	15.77	5.17	0.88	-	-	-	-	-	-
Cob Handling System(RIP)	5.34	2.98	0.51	-	-	-	-	-	-
Cob Handling System (GRIT)	5.34	2.98	0.51	-	-	-	-	-	-
Pelletizing Handling System (CH-PELL)	1.87	1.04	0.18	-	-	-	-	-	-
Hammer Milling HM1 (RIP)	10.51	10.51	10.51	-	-	-	-	-	-
Hammer Milling HM2 (RIP)	10.51	10.51	10.51	-	-	-	-	-	-
Hammer Milling RB HM (RIP)	5.26	5.26	5.26	-	-	-	-	-	-
Hammer Milling HM3 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM4 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HMBliss (4's)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM6 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM7 (4's)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM8 (4's)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM9 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
17 Dry Storage Bins	1.64	0.41	0.07	-	-	-	-	-	-
6 Dry Storage Bins	4.76	1.20	0.21	-	-	-	-	-	-
5 Wet Storage Bins	2.19	0.55	0.10	-	-	-	-	-	-
Pellet Mill and Cooler (PMC2)	73.58	73.58	73.58	-	-	-	-	-	-
Cob Dryer (CD1)	19.35	5.14	1.15	0.03	4.29	0.24	3.61	0.08	0.08
Cat Litter Bin	0.05	0.01	0.00	-	-	-	-	-	-
Cat Litter Bulk Bag Filling	0.19	0.06	0.01	-	-	-	-	-	-
6 Packing Bins	1.64	0.41	0.07	-	-	-	-	-	-
Cob Packaging including Gross Bagger	11.30	3.81	0.64	-	-	-	-	-	-
Shipping - truck/rail	11.30	3.81	0.64	-	-	-	-	-	-
Shipping - whole cob truck loading	11.30	3.81	0.64	-	-	-	-	-	-
Shipping - Reed tank truck loading	11.30	3.81	0.64	-	-	-	-	-	-
Total PTE	225.30	157.15	128.20	0.03	4.29	0.24	3.61	0.08	0.08
Fugitive									
Paved Roads	2.61	0.52	0.13	-	-	-	-	-	-
Unpaved Roads	7.26	1.85	0.19	-	-	-	-	-	-
Bulk Material Outdoor Storage (SP1)	2.27	2.22	2.20	-	-	-	-	-	-
Storage tanks	-	-	-	-	-	1.01E-03	-	-	-
Total (Fugitive)	12.14	4.60	2.52	-	-	1.01E-03	-	-	-

*PM_{2.5} listed is direct PM_{2.5}.

Potential to Emit After Control (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Single HAP Hexane)	Total HAPs
Receiving - Straight Truck	2.37	0.78	0.13	-	-	-	-	-	-
Cob Handling System(RIP)	0.53	0.30	0.05	-	-	-	-	-	-
Cob Handling System (GRIT)	0.53	0.30	0.05	-	-	-	-	-	-
Pelletizing Handling System (CH-PELL)	0.19	0.10	0.02	-	-	-	-	-	-
Hammer Milling HM1 (RIP)	1.05	1.05	1.05	-	-	-	-	-	-
Hammer Milling HM2 (RIP)	1.05	1.05	1.05	-	-	-	-	-	-
Hammer Milling RB HM (RIP)	0.53	0.53	0.53	-	-	-	-	-	-
Hammer Milling HM3 (GRIT)	0.32	0.32	0.32	-	-	-	-	-	-
Hammer Milling HM4 (GRIT)	0.32	0.32	0.32	-	-	-	-	-	-
Hammer Milling HMBliss (4's)	0.32	0.32	0.32	-	-	-	-	-	-
Hammer Milling HM6 (GRIT)	0.32	0.32	0.32	-	-	-	-	-	-
Hammer Milling HM7 (4's)	0.32	0.32	0.32	-	-	-	-	-	-
Hammer Milling HM8 (4's)	0.32	0.32	0.32	-	-	-	-	-	-
Hammer Milling HM9 (GRIT)	0.32	0.32	0.32	-	-	-	-	-	-
17 Dry Storage Bins (controlled)	0.16	0.04	0.01	-	-	-	-	-	-
6 Dry Storage Bins	0.10	0.02	0.00	-	-	-	-	-	-
5 Wet Storage Bins	1.64	0.41	0.07	-	-	-	-	-	-
Pellet Mill and Cooler (PMC2)	11.04	11.04	11.04	-	-	-	-	-	-
Cob Dryer (CD1)	2.97	1.05	0.45	0.03	4.29	0.24	3.61	0.08	0.08
Cat Litter Bin	0.01	0.00	0.00	-	-	-	-	-	-
Cat Litter Bulk Bag Filling	0.02	0.01	0.00	-	-	-	-	-	-
6 Packing Bins	0.16	0.04	0.01	-	-	-	-	-	-
Cob Packaging including Gross Bagger	1.13	0.38	0.06	-	-	-	-	-	-
Shipping - truck/rail	1.13	0.38	0.06	-	-	-	-	-	-
Shipping - whole cob truck loading	11.30	3.81	0.64	-	-	-	-	-	-
Shipping - Reed tank truck loading	11.30	3.81	0.64	-	-	-	-	-	-
Total PTE	49.42	27.31	18.08	0.03	4.29	0.24	3.61	0.08	0.08
Total (Fugitive)	12.14	4.60	2.52	-	-	1.01E-03	-	-	-

*PM_{2.5} listed is direct PM_{2.5}.

Potential to Emit After Issuance (Limited) (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Single HAP Hexane)	Total HAPs
Receiving - Straight Truck	15.77	5.17	0.88	-	-	-	-	-	-
Cob Handling System(RIP)	5.34	2.98	0.51	-	-	-	-	-	-
Cob Handling System (GRIT)	5.34	2.98	0.51	-	-	-	-	-	-
Pelletizing Handling System (CH-PELL)	1.87	1.04	0.18	-	-	-	-	-	-
Hammer Milling HM1 (RIP)	10.51	10.51	10.51	-	-	-	-	-	-
Hammer Milling HM2 (RIP)	10.51	10.51	10.51	-	-	-	-	-	-
Hammer Milling RB HM (RIP)	5.26	5.26	5.26	-	-	-	-	-	-
Hammer Milling HM3 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM4 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HMBliss (4's)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM6 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM7 (4's)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM8 (4's)	3.15	3.15	3.15	-	-	-	-	-	-
Hammer Milling HM9 (GRIT)	3.15	3.15	3.15	-	-	-	-	-	-
17 Dry Storage Bins (controlled)	1.64	0.41	0.07	-	-	-	-	-	-
11 Dry Storage Bins	4.76	1.20	0.21	-	-	-	-	-	-
5 Wet Storage Bins	2.19	0.55	0.10	-	-	-	-	-	-
Pellet Mill and Cooler (PMC2)**	11.04	11.04	11.04	-	-	-	-	-	-
Cob Dryer (CD1)	19.35	5.14	1.15	0.03	4.29	0.24	3.61	0.08	0.08
Cat Litter Bin	0.05	0.01	0.00	-	-	-	-	-	-
Cat Litter Bulk Bag Filling	0.19	0.06	0.01	-	-	-	-	-	-
6 Packing Bins	1.64	0.41	0.07	-	-	-	-	-	-
Cob Packaging including Gross Bagger	11.30	3.81	0.64	-	-	-	-	-	-
Shipping - truck/rail	11.30	3.81	0.64	-	-	-	-	-	-
Shipping - whole cob truck loading	11.30	3.81	0.64	-	-	-	-	-	-
Shipping - Reed tank truck loading	11.30	3.81	0.64	-	-	-	-	-	-
Total PTE	162.76	94.61	65.65	0.03	4.29	0.24	3.61	0.08	0.08
Total (Fugitive)	12.14	4.60	2.52	-	-	1.01E-03	-	-	-
Title V Major Source Thresholds:**	-	100	100	100	100	100	100	-	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

*PM_{2.5} listed is direct PM_{2.5}. **Unit PMC2 includes enforceable FESOP limits in permit (2.52 lb/hr)

(1) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward PSD and TV applicability.

(2) The source-wide total potential to emit of PM10 and PM2.5 are limited to less than one-hundred (100) tons per twelve (12) consecutive month period, in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

**Appendix A: Emission Calculations
SPR Summary**

Company Name: The Andersons, Inc. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
Permit Number: F015-41040-00035
SPR Number: 015-43101-00035
Reviewer: Luda Lang

Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
PTE of the New Emissions Units (tons/yr)									
Pelletizing Handling System (CH-PELL)	1.87	1.04	0.18	-	-	-	-	-	-
Pellet Mill and Cooler (PMC2)	73.58	73.58	73.58	-	-	-	-	-	-
Total PTE of the Revision:	75.45	74.63	73.76	-	-	-	-	-	-

*PM_{2.5} listed is direct PM_{2.5}.

Appendix A: Emission Calculations
Particulate Emissions for Cob Handling and Drying Process

Company Name: The Andersons, Inc. Delphi Cob Operations
 Source Address: 3902 North Anderson Drive, Delphi, IN 46923
 Permit Number: F015-41040-00035
 SPR Number: 015-43101-00035
 Reviewer: Luda Lang

Emissions unit Description	Unit ID	Maximum Capacity (tons/hour)	Emissions Factor (lb/ton)			Control Device(s)	Control Efficiency (%)	Stack/Vent ID	PTE Emissions Before Control (lb/hr)			PTE Emissions After Control (lb/hr)			PTE Emissions Before Control (tons/yr)			PTE Emissions After Control (tons/yr)		
			PM	PM10	PM2.5				PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5
Receiving station (Truck)	CR1	20	0.18	0.059	0.01	Cyclone #1	85%	CYC1	3.60	1.18	0.20	0.54	0.18	0.03	15.77	5.17	0.88	2.37	0.78	0.13
Cob Handling System(RIP)	CH-RIP	20	0.061	0.034	0.0058	Cyclone #2, RIP Baghouse	90%	BGH1	1.22	0.68	0.12	0.12	0.07	0.01	5.34	2.98	0.51	0.53	0.30	0.05
Cob Handling System (GRIT)	CH-GRIT	20	0.061	0.034	0.0058	Kice #1, Kice #2 Baghouses	90%	BGH2, BGH3	1.22	0.68	0.12	0.12	0.07	0.01	5.34	2.98	0.51	0.53	0.30	0.05
Pelletizing Handling System	CH-PELL	7	0.061	0.034	0.0058	Kice #1 Baghouse	90%	BGH2	0.43	0.24	0.04	0.04	0.02	0.00	1.87	1.04	0.18	0.19	0.10	0.02
Hammer Milling	HM1 (RIP)	20	0.12	0.12	0.12	RIP Baghouse	90%	BGH1	2.40	2.40	2.40	0.24	0.24	0.24	10.51	10.51	10.51	1.05	1.05	1.05
Hammer Milling	HM2 (RIP)	20	0.12	0.12	0.12	RIP Baghouse	90%	BGH1	2.40	2.40	2.40	0.24	0.24	0.24	10.51	10.51	10.51	1.05	1.05	1.05
Hammer Milling	RB HM (RIP)	10	0.12	0.12	0.12	RIP Baghouse	90%	BGH1	1.20	1.20	1.20	0.12	0.12	0.12	5.26	5.26	5.26	0.53	0.53	0.53
Hammer Milling	HM3 (GRIT)	6	0.12	0.12	0.12	Kice #2 Baghouse	90%	BGH3	0.72	0.72	0.72	0.07	0.07	0.07	3.15	3.15	3.15	0.32	0.32	0.32
Hammer Milling	HM4 (GRIT)	6	0.12	0.12	0.12	Kice #2 Baghouse	90%	BGH3	0.72	0.72	0.72	0.07	0.07	0.07	3.15	3.15	3.15	0.32	0.32	0.32
Hammer Milling	HM Bliss (4's)	6	0.12	0.12	0.12	Kice #2 Baghouse	90%	BGH3	0.72	0.72	0.72	0.07	0.07	0.07	3.15	3.15	3.15	0.32	0.32	0.32
Hammer Milling	HM6 (GRIT)	6	0.12	0.12	0.12	Kice #2 Baghouse	90%	BGH3	0.72	0.72	0.72	0.07	0.07	0.07	3.15	3.15	3.15	0.32	0.32	0.32
Hammer Milling	HM7 (4's)	6	0.12	0.12	0.12	Kice #2 Baghouse	90%	BGH3	0.72	0.72	0.72	0.07	0.07	0.07	3.15	3.15	3.15	0.32	0.32	0.32
Hammer Milling	HM8 (4's)	6	0.12	0.12	0.12	Kice #2 Baghouse	90%	BGH3	0.72	0.72	0.72	0.07	0.07	0.07	3.15	3.15	3.15	0.32	0.32	0.32
Hammer Milling	HM9 (GRIT)	6	0.12	0.12	0.12	Kice #2 Baghouse	90%	BGH3	0.72	0.72	0.72	0.07	0.07	0.07	3.15	3.15	3.15	0.32	0.32	0.32
17 Dry Storage Bins	Storage Bins 1	15	0.025	0.0063	0.0011	Kice #1 Baghouse	90%	BGH2	0.38	0.09	0.02	3.75E-02	9.45E-03	1.65E-03	1.64	0.41	0.07	0.16	4.14E-02	7.23E-03
6 Dry Storage Bins	Storage Bins 2	43.5	0.025	0.0063	0.0011	Bin Vent filters	98%	SB2-1-SB2-3	1.09	0.27	0.05	0.02	0.01	9.57E-04	4.76	1.20	0.21	0.10	0.02	4.19E-03
5 Wet Storage Bins	Storage Bins 3	20	0.025	0.0063	0.0011	None	25%	SB3-1-SB3-5	0.50	0.13	0.02	3.75E-01	9.45E-02	1.65E-02	2.19	0.55	9.64E-02	1.64E+00	4.14E-01	7.23E-02
Pellet Mill and Cooler	PMC2	7	2.40	2.40	2.40	Cyclone #3A	85%	CYC3A	16.80	16.80	16.80	2.52	2.52	2.52	73.58	73.58	73.58	11.04	11.04	11.04
Cob Dryer	CD1	20	0.22	0.055	0.0094	Cyclone #4	85%	CYC4	4.40	1.10	0.19	0.66	0.17	0.03	19.27	4.82	0.82	2.89	0.72	0.12
Cat Litter Bin	CL Bin	0.5	0.025	0.0063	0.0011	Kice #2 Baghouse	90%	BGH3	0.01	3.15E-03	5.50E-04	0.00	3.15E-04	5.50E-05	0.05	0.01	2.41E-03	0.01	0.00	2.41E-04
Cat Litter Bulk Bag Filling	CL Bagger	0.5	0.086	0.029	0.0049	Kice #2 Baghouse	90%	BGH3	0.04	0.01	2.45E-03	4.30E-03	1.45E-03	2.45E-04	0.19	0.06	0.01	1.88E-02	6.35E-03	1.07E-03
6 Packing Bins	Packing Bins 1	15	0.025	0.0063	0.0011	Kice #2 Baghouse	90%	BGH3	0.38	0.09	0.02	3.75E-02	9.45E-03	1.65E-03	1.64	0.41	0.07	0.16	4.14E-02	7.23E-03
Cob Packaging, including Gross Bagger	CP_Bagger	30	0.086	0.029	0.0049	Kice #1 Baghouse	90%	BGH2	2.58	0.87	0.15	0.26	0.09	1.47E-02	11.30	3.81	0.64	1.13	0.38	0.06
Shipping - truck/rail	S1	30	0.086	0.029	0.0049	Kice #1 Baghouse	90%	BGH2	2.58	0.87	0.15	0.26	0.09	1.47E-02	11.30	3.81	0.64	1.13	0.38	0.06
Shipping - whole cob truck loading	S2	30	0.086	0.029	0.0049	None		S2-V	2.58	0.87	0.15	2.58	0.87	0.15	11.30	3.81	0.64	11.30	3.81	0.64
Shipping - reed tank truck loading	S3	30	0.086	0.029	0.0049	None		S3-V	2.58	0.87	0.15	2.58	0.87	0.15	11.30	3.81	0.64	11.30	3.81	0.64
Total PTE															225.22	156.82	127.87	49.34	26.98	17.76

Notes
 (1) Source: AP-42 Section 9.9.1, Table 9.9.1-1 for Grain Receiving, Grain Handling, Storage Bin, and Grain Shipping; Table 9.9.1-2, Animal Feed Mills for Hammermill and Pellet Cooler. Note that the emission factor for hammermill and pellet cooler are back-calculated values. A baghouse is assumed to be 90% efficient, and Cyclone - 85%.
 (2) Emission controlled for wet storage is assigned 25% based on engineering judgment because of moisture content of corn cob is 25%
 Bins #4, #8 and #11 at Storage Bins 2 are, each, closed loop system and has no exhaust, therefore not considered an emission point.
 PTE of PM/PM10 Before Control (tons/year) = Maximum throughput (tons/hour) x Emission Factor (lbs/ton) x 8760 hours/year x 1 ton/2000 lbs
 PTE of PM/PM10 After Control (tons/year) = PTE of PM/PM10 Before Control (tons/year) x (1- Control Efficiency)

Appendix A: Emissions Calculations
Bulk Material Outdoor Storage (SP1)

Company Name: The Andersons, Inc. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
Permit Number: F015-41040-00035
SPR Number: 015-43101-00035
Reviewer: Luda Lang

Emission Activity	Material Throughput Restriction		Storage Pile Surface Area		Emission Factor				PTE Emissions					
					lbs/ton			lb/day-acre	PM _{2.5}		PM ₁₀		PM	
	tons/hr	tons/yr	ft ²	acres	PM	PM ₁₀	PM _{2.5}	PM/PM ₁₀ /PM _{2.5}	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Load-in (Pneumatic Transfer) ⁽¹⁾	40	100,000	N/A	N/A	0.03	0.03	0.03	N/A	1.17	1.46	1.17	1.46	1.17	1.46
Load-out (Payload Reclaim) ⁽²⁾	40	100,000	N/A	N/A	1.43E-03	5.02E-04	7.60E-05	N/A	0.003	0.004	0.02	0.03	0.06	0.07
Wind Erosion ⁽³⁾	N/A	N/A	28,000	0.64	N/A	N/A	N/A	6.30	0.17	0.74	0.17	0.74	0.17	0.74
Total Emissions									1.34	2.20	1.36	2.22	1.39	2.27

Notes:

(1) There is no AP-42 factor for pneumatic unloading of corncobs; therefore the AP-42 for pneumatic unloading of cement is used with adjustments as further described. The emission factor from pneumatic unloading of cement to elevated storage (AP-42, Table 11.12-2) is 0.73 lb PM/ton of cement unloaded. Because the emission factor is for fine material (i.e., cement) and the corncobs contain about 4% fines, the Load-in emission factor for the corncob delivery is estimated as follows:

0.73 lb PM/1.0 ton fines x 0.04 ton fines/ton corncob = 0.029 lb PM/ton corncob

(2) Emission factor is based on the drop operation provided in Sec. 13.2.4 - Agg. Hand. & Storage Piles, USEPA AP-42, 5th Ed., 11/06 (Rating A).

$$E = K (0.0032) [(U/5)^{1.3}/(M/2)^{1.4}]$$

K (particle size multiplier) = 1 for PM >30 um, 0.74 for PM <30 um, 0.35 for PM <10 um, and 0.053 for PM <2.5 um

U (Average wind speed)

M (material moisture content (%))

(3) Emission factor based on "Control of Fugitive and Hazardous Dusts" by C. Cowherd and Others (Also USEPA document, "Identification, Assessment and Control of Fugitive Particulate Emissions, - Section 8: Fugitive Emissions Control Strategy Development," EPA-600/8-86-023

$$E = 1.7 \left(\frac{s}{1.5} \right) \left(\frac{365-p}{235} \right) \left(\frac{f}{15} \right)$$

s = silt content (%)

p = number of days with ≥ 0.01 inches of precipitation per year

= 120 rainy days (AP-42), Figure 13.2.2-1 Mean number of days with 0.01 inch or more of precipitation in United States(9/98). Value for Indiana)

f = percentage of time that the unobstructed wind speed exceeds 12 mph at the mean pile height

= 20 (Cowherd default value)

U (Wind Speed) miles/hr	M (Moisture Content) %	silt content
12	8	4

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

Company Name: The Andersons, Inc. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
Permit Number: F015-41040-00035
SPR Number: 015-43101-00035
Reviewer: Luda Lang

Heat Input Capacity MMBtu/hr	10.0	HHV mmBtu mmscf		Potential Throughput MMCF/yr						
		1020	85.9							
		Pollutant								
Emission Factor in lb/MMCF	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO			
	1.9	7.6	7.6	0.6	100	5.5	84			
					**see below					
Potential Emission in tons/yr	0.08	0.33	0.33	0.03	4.29	0.24	3.61			

*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/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.0E-05	5.2E-05	3.2E-03	0.08	1.5E-04	0.08

	HAPs - Metals					Total - Metals	
	Lead	Cadmium	Chromium	Manganese	Nickel		
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03		
Potential Emission in tons/yr	2.1E-05	4.7E-05	6.0E-05	1.6E-05	9.0E-05	2.4E-04	
						Total HAPs	0.08
						Worst HAP	0.08

Methodology is the same as above.

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

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

**Appendix A: Emissions Calculations
Storage Tanks**

Company Name: The Andersons, Inc. Delphi Cob Operations
Source Address: 3902 North Anderson Drive, Delphi, IN 46923
Permit Number: F015-41040-00035
SPR Number: 015-43101-00035
Reviewer: Luda Lang

Item	Emissions Unit ID	Source Description	Tank Capacity (gals)	Tank Dimensions		Maximum Throughput (gals/yr)	Annual Tank Turnovers	VOC Emissions	
				Diameter (ft)	Height/Length (ft)			lbs/yr ⁽¹⁾	tons/yr
1	DT1	1000-Gallon Diesel Storage Tank	1,000	4	11	500,000	500	2	1.00E-03
2	MT1	2000-Gallon Mineral Oil Storage Tank	2,000	6	18	500,000	250	0.01	5.0E-06
3	MT2	8000-Gallon Mineral Oil Storage Tank	8,000	11	14	500,000	59	0.01	5.0E-06
Total									1.01E-03

Notes:

(1) Based on USEPA's Tank 4.09d emission calculations (attached)

The SDS for mineral oil (attached) indicates that it is a mixture of hydrocarbons, C13 - C23 Alkanes. Tank 4.09d emissions are quantified based on the median Alkane: C18 (n-octadecane)

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: The Andersons, Inc. Delphi Cob Operations
 Source Address: 3902 North Anderson Drive, Delphi, IN 46923
 Permit Number: F015-41040-00035
 SPR Number: 015-43101-00035
 Reviewer: Luda Lang

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 vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (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)	50.0	1.0	50.0	25.0	1250.0	600	0.114	5.7	2073.9
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	5.0	250.0	600	0.114	5.7	2073.9
Totals			100.0		1500.0			11.4	4147.7

Average Vehicle Weight Per Trip = 15.0 tons/trip
 Average Miles Per Trip = 0.11 miles/trip

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

where k =	PM	PM10	PM2.5	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	0.011	0.0022	0.00054	tons = average vehicle weight
sL =	15.0	15.0	15.0	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)
	9.7	9.7	9.7	

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

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

Unmitigated Emission Factor, Ef =	PM	PM10	PM2.5	lb/mile
Mitigated Emission Factor, Eext =	1.377	0.275	0.0676	lb/mile
	1.259	0.252	0.0618	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	1.31	0.26	0.06
Vehicle (leaving plant) (one-way trip)	1.31	0.26	0.06
Totals	2.61	0.52	0.13

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (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 (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (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 - Unpaved Roads

Company Name: The Andersons, Inc. Delphi Cob Operations
 Source Address: 3902 North Anderson Drive, Delphi, IN 46923
 Permit Number: F015-41040-00035
 SPR Number: 015-43101-00035
 Reviewer: Luda Lang

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 of Loaded Vehicle (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)	50.0	1.0	50.0	25.0	1250.0	600	0.114	5.7	2073.9
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	5.0	250.0	600	0.114	5.7	2073.9
Totals			100.0		1500.0			11.4	4147.7

Average Vehicle Weight Per Trip = 15.0 tons/trip
 Average Miles Per Trip = 0.11 miles/trip

Unmitigated Emission Factor, Ef = $k[(s/12)^a][(W/3)^b]$ (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 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	15.0	15.0	15.0	tons = average vehicle weight
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, Eext = $E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E * [(365 - P)/365]$
 where P = 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, Ef =	5.32	1.36	0.14	lb/mile
Mitigated Emission Factor, Eext =	3.50	0.89	0.09	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	3.63	0.93	0.09
Vehicle (leaving plant) (one-way trip)	3.63	0.93	0.09
Totals	7.26	1.85	0.19

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (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)]
 Mitigated PTE (Before Control) (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (After Control) (tons/yr) = (Mitigated PTE (Before Control) (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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 16, 2020

Mr. Adam Smith
The Andersons, Inc. Delphi Cob Operations
3902 North Anderson Drive
Delphi, Indiana 46923

Re: Public Notice
The Andersons, Inc. Delphi Cob Operations
Permit Level: FESOP Significant Permit Revision
(Minor PSD)
Permit Number: 015-43101-00035

Dear Mr. Smith:

Enclosed is a copy of the preliminary findings for your draft air permit, including the draft permit, Technical Support Document, emission calculations, and the Notice of 30-Day Period for Public Comment.

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. The Notice of 30-Day Period for Public Comment (without supporting documents) has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <https://www.in.gov/idem/5474.htm>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Delphi Public Library, 222 East Main Street in Delphi, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Mrs. Luda Lang, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0863 or dial (317) 233-0863.

Sincerely,
John F. Jackson

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 8/10/2020



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 16, 2020

To: Delphi Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: The Andersons, Inc. Delphi Cob Operations
Permit Number: 015-43101-00035

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

September 16, 2020
The Andersons, Inc. Delphi Cob Operations
015-43101-00035

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <https://www.in.gov/idem/5474.htm>.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 16, 2020

A 30-day public comment period has been initiated for:

Permit Number: 015-43101-00035
Applicant Name: The Andersons, Inc. Delphi Cob Operations
Location: Delphi, Carroll County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

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

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	JJACKSON September 16, 2020 The Andersons Inc Delphi Cob Operations 015-43101-00035 (DRAFT)		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: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Adam Smith The Andersons Inc Delphi Cob Operations 3902 N. Anderson Dr Delphi IN 46923 (Source CAATS)									
2		Scott Tatro Director The Andersons Inc Delphi Cob Operations 515 Illinois Avenue Maumee OH 43537 (RO CAATS)									
3		Delphi City Council and Mayors Office 201 S. Union St Delphi IN 46923 (Local Official)									
4		Carroll County Commissioners 101 West Main Street Delphi IN 46923 (Local Official)									
5		Carroll County Health Department 101 W. Main St, Courthouse Delphi IN 46923-1566 (Health Department)									
6		Delphi Public Library 222 E Main St Delphi IN 46923-1593 (Library)									
7		Ebenezer Sada T&M Associates 4675 Lakehurst Court, Suite 250 Columbus OH 43016 (Consultant)									
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--