

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

February 16, 2024

**PERMIT TO INSTALL
17-24**

ISSUED TO
The Andersons Marathon Holdings LLC

LOCATED AT
26250 B. Drive North
Sheridan Township, Michigan 49224

IN THE COUNTY OF
Calhoun

STATE REGISTRATION NUMBER
B8570

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: November 27, 2023	
DATE PERMIT TO INSTALL APPROVED: February 16, 2024	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS 2
POLLUTANT / MEASUREMENT ABBREVIATIONS..... 3
GENERAL CONDITIONS 4
EMISSION UNIT SPECIAL CONDITIONS..... 6
 EMISSION UNIT SUMMARY TABLE 6
 EU-GRAINRECEIVE 7
APPENDICES 9
 Appendix 3. Monitoring Requirements..... 9
 Appendix 9. Fugitive Dust Control Plan 11

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO _{2e}	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU-GRAINRECEIVE	Grain receiving - one building located at the grain elevator with two truck unloading receiving pits with a capacity of 15,000 bushel/hr. The operation is controlled by baghouse C-201.	10-01-1981, 10-22-2019, TBD	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EU-GRAINRECEIVE EMISSION UNIT CONDITIONS

DESCRIPTION

Grain receiving - one building located at the grain elevator with two truck unloading receiving pits with a capacity of 15,000 bushel/hr. The operation is controlled by baghouse C-201.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse C-201

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Visible Emissions	5 percent opacity	Six-minute average	EU-GRAINRECEIVE	SC VI.1	R 336.1205(1), R 336.1301, R 336.1901

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Grain Received	34 million bushels	12-month rolling time period as determined at the end of each calendar month	EU-GRAINRECEIVE	SC VI.3	R 336.1205(1), 40 CFR 52.21 (c) & (d)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The applicant shall not operate EU-GRAINRECEIVE unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix 9 has been implemented and is maintained. **(R 336.1205(1), R 336.1901, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The applicant shall equip and maintain the open end of the truck unloading enclosure portions of EU-GRAINRECEIVE with a canvas barrier or other such device to close off as much as possible the open doorway while truck unloading occurs. **(R 336.1205(1), R 336.1301, R 336.1901, R 336.1910)**
2. The permittee shall not operate the receiving pit portion of EU-GRAINRECEIVE unless the elevator baghouse C-201 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the elevator baghouse C-201 includes maintaining it according to the malfunction abatement plant (MAP). **(R 336.1205(1), R 336.1331, R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall conduct a monthly one-minute visible emissions observation of the EU-GRAINRECEIVE vents during routine operating conditions. For the purpose of this condition, such observations shall follow the procedures to record the reading, perform maintenance, and eliminate visible emissions outlined in Appendix 3. If an observation reveals any visible emissions from the vent (other than uncombined water vapor), the permittee shall inspect the particulate control system and perform any maintenance required to eliminate visible emissions. **(R 336.1205(1), R 336.1301)**
2. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for EU-GRAINRECEIVE. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1), R 336.1301)**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the bushels of grain received in EU-GRAINRECEIVE. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1), 40 CFR 52.21(c) & (d))**

VII. REPORTING

1. Within 10 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than the increase of the receiving pit size for EU-GRAINRECEIVE. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. S-201A	43	65	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

APPENDICES

Appendix 3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-OXID, FGOXID2, EU-GRAINRECEIVE, EU-GRAINDRY, EU-LOADOUT, FGC-20, FG-CORNBINS, FGC-30, and FG-MILL2.

1. Visible emissions shall be recorded as “observed” or “not observed.”
1. If visible emissions are observed, the maintenance supervisor shall be notified immediately and steps 2 through 6 must be followed.
2. A determination of needed repairs and/or maintenance, if applicable, shall be made within 24 hours and recorded.
3. If necessary, repair and/or maintenance operations shall be performed within 48 hours of discovery.
4. Routine maintenance shall be performed according to the manufacturer’s recommendations.
6. A six-minute average, Method 9 reading shall be performed to confirm compliance with the visible emission limit.

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-OXID and FG-CHP.

NO_x and CO₂/O₂ Monitoring Continuous Emission Monitoring System (CEMS) Requirements

1. The permittee shall maintain a copy of the Monitoring Plan. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CEMS.
2. The permittee shall maintain a copy of the final report demonstrating the CEMS complies with the requirements of the corresponding Performance Specifications (PS) in the following table.

Pollutant	Applicable PS
NO _x	2
CO ₂ / O ₂	3

3. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations.
4. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 and 3 of Appendix B, 40 CFR Part 60.
5. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F)
6. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:

- a) A report of each exceedance above the limits specified in the conditions of this permit. This includes the date, time, magnitude, cause, and corrective actions of all occurrences during the reporting period.
- b) A report of all periods of CEMS downtime and corrective action.
- c) A report of the total operating time of each boiler during the reporting period.
- d) A report of any periods that the CEMS exceeds the instrument range.

If no exceedances or CEMS downtime occurred during the reporting period, the permittee shall report that fact.

All monitoring data shall be kept on file for a period of at least five years and made available to the AQD upon request.

Appendix 9. Fugitive Dust Control Plan

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EU-GRAINRECEIVE, EU-GRAINSHIPPED, EU-INTERNALOP, EU-GRAINDRY, and FGC-20.

Grain Handling, Storage, and Drying - Plant and Roadways

I. Site Roadways/Plant Yard

- a) The dust on the site roadways/plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet all applicable emission limits.
- b) All paved roadways/plant yards shall be swept as needed between applications.
- c) Any material spillage on roads shall be cleaned up immediately.

II. Plant

- a) The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve. All transfer points shall be enclosed.

III. Grain Storage

- a) All outdoor storage of grain shall be covered.

IV. Truck Traffic

- a) On-site: Vehicles shall be loaded to prevent their contents from dropping, leaking, blowing, or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within six inches of the top of any side board, side panel or tail gate, otherwise, the truck shall be tarped.

V. AQD/EGLE Inspection

- a) The provisions and procedures of this plan are subject to adjustment if following an inspection and written notification the AQD finds the fugitive dust requirements and/or permitted emission limits are not being met.