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

Brian C. Rockensuess
Commissioner

November 25, 2024

VIA ELECTRONIC MAIL
Matthew Vanfossan
The Andersons, Inc. – Oakville Grain Elevator
430 W Oakville Road
Oakville, IN 47367
Matthew_vanhofassan@andersonsinc.com

Re: Inspection Summary/Violation Letter
The Andersons, Inc. – Oakville Grain Elevator
Source ID 035-00031
Oakville, Delaware County

Dear Matthew Vanfossan:

On November 19, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of The Andersons, Inc. – Oakville Grain Elevator, located at 430 W Oakville Road in Oakville, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: Violations were observed

At the time of the inspection, the following violations were noted:

1) Pursuant to Permit No. 42303 Condition B.8 an annual notification shall be submitted no later than March 1st of each year.

   The source had submitted an annual notification for the reporting year 2022 after the March 1st deadline.

The Office of Air Quality will not take legal action at this time. However, any such violation(s) in the future may result in legal action being pursued. Please direct any questions to Melanie Raplee, Compliance Inspector, at (317)741-7636 or by email at MRaplee@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Patrick Austin, Chief
Compliance Section 3
Office of Air Quality

ACES ID: 303676
cc: Melanie Raplee, Compliance and Enforcement Branch, Office of Air Quality
Natalie Ruiz, Compliance and Enforcement Branch, Office of Air Quality
Delaware County Health Department

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT

SOURCE INFORMATION	
SOURCE NAME	The Andersons, Inc. – Oakville Grain Elevator
SOURCE LOCATION	430 W Oakville Road, Oakville, Indiana Delaware County
MAILING ADDRESS	430 W Oakville Road, Oakville, IN 47367
PLANT ID	035-00031
PERMIT INFORMATION	Permit Type: MSOP Permit Number: 47864 Permit Expiration Date: 03/18/2030 VFC Document No.(hyperlink): 83656431
ATTAINMENT STATUS	☒ Attainment for all criteria pollutants ☐ Nonattainment for ☐SO_2 ☐CO ☐O_3 ☐NO_2 ☐Pb ☐PM_{10} ☐$PM_{2.5}$
SOURCE STATUS	☐ PSD Major (326 IAC 2-2) ☐ Major Source of HAPs ☐ Emission Offset (326 IAC 2-3) ☒ Area Source of HAPs ☐ Acid Rain (326 IAC 21)
SOURCE DESCRIPTION	The Permittee owns and operates a stationary grain elevator (corn, wheat, soybeans).

INSPECTION INFORMATION			
INSPECTED BY	Melanie Raplee & Natalie Ruiz		
INSPECTION DATE AND TIME	November 19, 2024	TIME IN: 11:15A	TIME OUT: 11:40A
REPORTED BY	Melanie Raplee	REPORT DATE: 11/19/2024	
COMPLIANCE PERIOD REVIEWED	09/03/2020 to 11/19/2024		
INSPECTION NOTIFICATION	☒ Unannounced ☐ Announced:		
INSPECTION OBJECTIVE(S)	☐ Compliance Monitoring Strategy (CMS) ☒ Commitment ☐ Mega-Site: ☐ FCE ☐ PCE ☐ Complaint ☐ Other: ☐ Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 303676	Complaint: N/A	Violation/Warning: 303726
RM TRACKING NUMBER(S)	Complaint: N/A		
INSPECTION BACKGROUND	This source was last inspected in 2020 as a complaint inspection for fugitive dust with no violations found. This source had first obtained a permit by rule (30752) on 10/21/2011. Since the issuance of that first permit the source has transitioned into having a MSOP (35299) which has had one renewal and one administrative amendment. When speaking with the operations manager of this facility this source's peak season for shipping out grain is November through January with January typically having the highest traffic shipped out.		

SOURCE PERSONNEL INTERVIEWED			
Name	*Title*	*Phone Number*	*Email Address*
Matthew Vanfossan	Operations Manager	765-282-0169	Matthew_vanfossan@andersonsinc.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	*Inspection/Complaint Type*	*Result*	*Comments*
09/03/2020	Complaint	No Violations Noted	N/A

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
11/19/2015	Commitment/Complaint	Violations Noted	Construction without a permit had occurred.

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	*Action Taken*	*Describe Violation(s)*	
N/A			
Formal Enforcement Actions			
Case Number	*Enforcement Type*	Civil Penalty	Describe Violation(s)
N/A		$	
Other Relevant Actions			
Action Taken	*Comments*		
N/A			

PERMIT SECTION D.1

Emission Units and Control Devices:

Emissions Unit Description:

(a) One (1) Grain Unloading Station, identified as EU001, constructed prior to 2004, with a maximum capacity of 15,000,000 bushels per year (420,000 tons) and including the following equipment:

(1) Dry Beans Pit, identified as Pit #2, with a maximum capacity of 3,500 BPH, using no control and exhausting outdoors;

(2) Receiving Pit 5W, identified as Pit #5W, constructed in 2015, with a maximum capacity of 25,000 BPH, using dust filter as control and exhausting through stack EP1;

(3) Receiving Pit 5E, identified as Pit #5E, constructed in 2015, with a maximum capacity of 25,000 BPH, using dust filter as control and exhausting through stack EP2.

(b) One (1) Grain Handling Operation, identified as EU002, with a maximum capacity of 15,000,000 bushels per year (420,000 tons), using no control, exhausting outdoors and including the following equipment:

(1) Grain Handling Operations Associated with Grain Unloading (Straight Truck)
- (A) # 2 Receiving Leg, identified as EL2, constructed prior to 2004;
- (B) North Receiving Drag Conveyor, identified as D1, constructed in 2015;
- (C) South Receiving Drag Conveyor, identified as D2, constructed in 2015;
- (D) East Receiving Leg/elevator, identified as L1, constructed in 2015;
- (E) West Receiving Leg, identified as L2, constructed in 2015;

(2) Grain Handling Operations Associated with Temporary Storage Facility
- (A) Belt Conveyor, identified as B12, constructed in 2015;
- (B) Belt Conveyor, identified as B13, constructed in 2015;
- (C) Drag Conveyor, identified as D14, constructed prior to 2004;
- (D) Drag Conveyor, identified as D15, constructed prior to 2004;
- (E) Drag Conveyor, identified as D16, constructed prior to 2004;
- (F) Grain Screener, identified as S1 constructed in 2015;
- (G) Tank 51, identified as T51, with a storage capacity of 2,500 bushels, constructed in 2015;
- (H) Screening Transfer, identified as D29, constructed in 2015;
- (I) Pile Leg/elevator, identified as L3, constructed in 2015;

(3) Grain Handling Operations Associated with Permanent Grain Storage
- (A) North Crossover Fill Drag Conveyor, identified as D5, constructed in 2015;
- (B) North Fill Drag Conveyor (Tanks 43 & 44), identified as D6, constructed in 2015;
- (C) North Fill Belt Conveyor (Tanks 46), identified as B7A, constructed in 2015;
- (D) North Fill Belt Conveyor (Tanks 46), identified as B7B, constructed in 2015;
- (E) North Fill Belt Conveyor (Tanks 47), identified as B8, constructed in 2015;
- (F) North Fill Belt Conveyor (Tanks 48), identified as B9, constructed in 2015;
- (G) North Fill Belt Conveyor (Tanks 49), identified as B10 constructed in 2015;
- (H) North Fill Belt Conveyor (Tanks 50), identified as B11, constructed in 2015;
- (I) 20 x 17 Drag Conveyor, identified as EC3, constructed prior to 2004;

PERMIT SECTION D.1

(J) 24" Drag Conveyor, identified as EC2, constructed prior to 2004;
(K) South Crossover Fill Drag Conveyor, identified as D17, constructed in 2015;
(L) South Fill Drag Conveyor (Tanks 38 & 39), identified as D18, constructed in 2015;
(M) South Fill Drag Conveyor (Tank 35), identified as D19, constructed in 2015;
(N) South Fill Drag Conveyor (Tanks 33 & 34), identified as D20, constructed in 2015;
(O) South Fill Drag Conveyor (Tanks 31 & 32), identified as D21, constructed in 2015;
(P) South Fill Drag Conveyor (Tanks 40 & 41), identified as D22, constructed in 2015;
(Q) South Fill Drag Conveyor (Tanks 36 & 37), identified as D23, constructed in 2015;
(R) Reversible Drag Conveyor (Tanks 36 & 37), identified as D24, constructed in 2015;
(S) Reversible Drag Conveyor (Tanks 40 & 41), identified as D25, constructed in 2015;
(T) One (1) Drag Conveyor, identified as EC1-R, permitted in 2024;
(U) Twelve (12) Reclaim Drag Conveyors, identified as EC5-EC17, constructed prior to 2004;
(V) # 1 Receiving Leg, identified as EL1, constructed prior to 2004;

(4) Grain Handling Operations Associated with Grain Drying
(A) One (1) 12x6 Wet Leg (Brock Dryer), identified as EL6a, constructed prior to 2004;
(B) 14x7 Wet Leg/ (Tanks 40 and 41), identified as EL5, constructed prior to 2004;
(C) One (1) 12x6 Dry Leg (Brock Dryer), identified as EL6b, constructed prior to 2004;
(D) Wet Leg/Bucket Elevator (Zimmerman Dryer), identified as L4, constructed in 2015;
(E) # 3 Receiving Leg, identified as EL3, constructed prior to 2004;
(F) One (1) Drag Conveyor (Zimmerman Dryer), identified as D27, constructed in 2015;
(G) One (1) Drag Conveyor (Zimmerman Dryer), identified as D28, constructed in 2015.

(5) Grain Handling Operations Associated with Grain Loading
(A) One (1) 16 x 8 Shipping Leg/Bucket Elevator, identified as EL7, constructed prior to 2004;
(B) One (1) Cleaner unit, constructed prior to 2004;
(C) One (1) Scale, constructed prior to 2004;
(D) Two (2) Garners, constructed prior to 2004;
(E) One (1) Sampler, constructed prior to 2004.
(F) # 4 Receiving Leg, identified as EL4, constructed prior to 2004;

(c) One (1) Temporary Storage Facility (Exterior Flat/Pile Storage), identified as EU003, constructed prior to 2004 using no control and exhausting outdoors;

(d) One (1) Permanent Grain Storage Area, identified as EU004, constructed prior to 2004, with a maximum capacity of 15,000,000 bushels per year (420,000 tons), using no control, exhausting outdoors and including the following equipment:
(1) Twenty-two (22) storage tanks, identified as; T29, T30, T31, T32, T33, T34, T35, T36, T37, T38, T39, T40, T41, T42, T43, T44, T45, T46, T47, T48, T49, T50.

(e) One (1) Grain Drying Operation, identified as EU005, with a maximum allowable capacity of 15,000,000 bushels per year (420,000 tons), using no control, exhausting outdoors and including the following equipment:
(1) One (1) Brock Dryer, identified as EU005a, constructed in 2011, with a maximum heat input capacity of 37.7 MMBtu/hr;
(2) One (1) GSI Zimmerman Dryer, identified as EU005b, constructed in 2015, with a maximum heat input capacity of 42 MMBtu/hr;

(f) One (1) Grain Loading Operation (Straight Truck and Rail), identified as EU006, constructed prior to 2004, with a maximum allowable capacity of 15,000,000 bushels per year (420,000 tons), consisting of one (1) loadout spout, equipped with a telescoping spout and the grain loaded out has oil applied to control particulate emissions and exhausting outdoors.

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

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 6-3-2

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No

PERMIT SECTION D.1		
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☒ No
Recordkeeping Requirements	☐ Yes ☒ No	☐ Yes ☒ No
Types of Records Reviewed: N/A		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☒ No

Observations and Comments:

At the time of the inspection, the Anderson's Oakville Grain Elevator was in operation loading the Grain onto semi-trucks. Mr. Vanfossan informed us that the telescoping spout for the mineral oil when loading grain into the trucks as a part of the routine when training the operators on how to properly offload the grain onto trucks and railcars. When I asked as to the process of training these individuals Mr. Vanfossan stated that the operator who was currently implementing the onloading process was one of the company's newer operators but still had over two (2) years of experience. After the truck loading process was observed Ms. Ruiz and I noted that the opacity of the particulate matter released by the grain was below the 10% opacity requirement. Once the truck loading process was observed we started walking back and stopped at the truck unloading process station, where no visible emissions were observed.

After the process was completed, I inquired as to what the company uses to suppress fugitive dust throughout the year, whether that be a water truck to water the gravel or a chemical dust suppressant that is occasionally sprayed on the ground. Mr. Vanfossan informed me that they use a dust suppressant on the ground and normally spray the gravel in the spring and in the fall. Before the start of the inspection Ms. Ruiz and I observed the facility and noted no fugitive dust was leaving the boundaries of the property from either the gravel roads or the grain loading systems. After this was completed, I then inquired about the source's preventative maintenance plan and how often the operators conduct PM's on the equipment, to which MR. Vanfossan stated that full facility wide PM's are conducted quarterly however if they have the knowledge that a large shipment is due to arrive or be shipped out the team will perform cursory checks on the conveyor equipment and the mineral oil spout to make sure that everything is working properly. This explanation was found to be acceptable.

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.1

Emission Units and Control Devices:

Emissions Unit Description:

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- (1) Dry Beans Pit, identified as Pit #2, with a maximum capacity of 3,500 BPH, using no control and exhausting outdoors;
- (2) Receiving Pit 5W, identified as Pit #5W, constructed in 2015, with a maximum capacity of 25,000 BPH, using dust filter as control and exhausting through stack EP1;
- (3) Receiving Pit 5E, identified as Pit #5E, constructed in 2015, with a maximum capacity of 25,000 BPH, using dust filter as control and exhausting through stack EP2.

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- (1) Grain Handling Operations Associated with Grain Unloading (Straight Truck)
  - (A) # 2 Receiving Leg, identified as EL2, constructed prior to 2004;
  - (B) North Receiving Drag Conveyor, identified as D1, constructed in 2015;
  - (C) South Receiving Drag Conveyor, identified as D2, constructed in 2015;
  - (D) East Receiving Leg/elevator, identified as L1, constructed in 2015;
  - (E) West Receiving Leg, identified as L2, constructed in 2015;
- (2) Grain Handling Operations Associated with Temporary Storage Facility
  - (A) Belt Conveyor, identified as B12, constructed in 2015;

PERMIT SECTION E.1

(B) Belt Conveyor, identified as B13, constructed in 2015;
(C) Drag Conveyor, identified as D14, constructed prior to 2004;
(D) Drag Conveyor, identified as D15, constructed prior to 2004;
(E) Drag Conveyor, identified as D16, constructed prior to 2004;
(F) Grain Screener, identified as S1 constructed in 2015;
(G) Tank 51, identified as T51, with a storage capacity of 2,500 bushels, constructed in 2015;
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PERMIT SECTION E.1

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(f) One (1) Grain Loading Operation (Straight Truck and Rail), identified as EU006, constructed prior to 2004, with a maximum allowable capacity of 15,000,000 bushels per year (420,000 tons), consisting of one (1) loadout spout, equipped with a telescoping spout and the grain loaded out has oil applied to control particulate emissions and exhausting outdoors.

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

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rule:

40 CFR 60 Subpart DD

Applicability Information:

This NSPS is applicable as the facility in made up of grain terminal elevator or any grain storage elevator, except as provided under § 60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations that was constructed after August 3, 1978.

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☒ No
Testing Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: annual throughput in bushels		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☒ No

Observations and Comments:

At the time of the inspection, the Anderson's Oakville Grain Elevator was in operation loading the Grain onto semi-trucks. Mr. Vanfossan informed us that the telescoping spout for the mineral oil when loading grain into the trucks as a part of the routine when training the operators on how to properly offload the grain onto trucks and railcars. When I asked as to the process of training these individuals Mr. Vanfossan stated that the operator who was currently implementing the onloading process was one of the company's newer operators but still had over two (2) years of experience. After the truck loading process was observed Ms. Ruiz and I noted that the opacity of the particulate matter released by the grain was below the 10% opacity requirement. Once the truck loading process was observed we started walking back and stopped at the truck unloading process station, where no visible emissions were observed.

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The table below has the annual throughput of the source in bushels per year of grain for the compliance period.

PERMIT SECTION E.1

Oakville

		2015	2016	2017	2018	2019	2020	2021	2022	2023
Receiving										
	Straight Truck	702,330	764,775	704,625	900,550	907,454	1,110,189	996,875	1,007,897	1,297,244
	Hopper Truck	8,076,796	8,794,922	8,103,189	10,544,352	10,435,719	12,765,928	11,464,065	11,590,815	11,675,195
	Railcar	0	0	0	0	0	0	0	0	0
	Ship	0	0	0	0	0	0	0	0	0
Shipping										
	Truck	1,088,989	1,378,626	1,861,708	2,622,954	2,235,334	7,038,754	4,731,532	3,873,584	5,275,813
	Railcar	3,745,315	7,189,195	6,782,586	8,489,215	7,670,494	7,810,488	6,796,084	10,465,133	6,326,394
	Ship	0	0	0	0	0	0	0		

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

ADDITIONAL SOURCE COMPLIANCE REVIEW:

The following reports are required and were reviewed:

☐ Annual Compliance Certification(s) ☐ Deviation & Compliance Monitoring Report(s)
☒ Annual Notification(s) ☐ Emission Statement(s)

The reports are consistent with inspection observations.	☒ Yes ☐ No ☐ N/A
The permit accurately represents emission units observed on site.	☒ Yes ☐ No ☐ N/A
Compliance assistance was provided during the inspection.	☒ Yes ☐ No ☐ N/A
The source is required to have a Risk Management Plan [40 CFR 68].	☐ Yes ☒ No
If yes, the source has a plan.	☐ Yes ☐ No ☒ N/A
If yes, the employees have been trained.	☐ Yes ☐ No ☒ N/A

Additional Information and Comments:

The annual notifications have been reported on time over the course of the most recent compliance period aside from Annual Notification 2022 which was submitted after the March 1st (3/01) deadline for submittal.

Additional Source Compliance Review Status:

☐ No violations were observed or determined for this permit section at the time of the inspection.
☒ The following violations were determined for this permit section at the time of the inspection:
The late submittal of the 2022 annual notification.

INSPECTION FINDINGS

☐ No violations were observed or determined at the time of the inspection.
☒ The following violations were determined at the time of the inspection:
The annual notification for the reporting year 2022 was submitted after the required date.

RECOMMENDED ACTION	Issue inspection summary/violation letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Matthew Vanfossan prior to exiting the facility.

ATTACHMENTS

N/A

SUPPORTING DOCUMENTATION

Photo No. 1

Source Name:	The Andersons, Inc. – Oakville Grain Elevator
Photographer:	Melanie Raplee, IDEM, Office of Air Quality
Date and Time:	November 19, 2024, 11:29AM
Others Present:	Natalie Ruiz – IDEM, Office of Air Quality Matthew Vanfossan – The Andersons Oakville Grain Elevator
Description:	The Semi-truck grain loading process at Andersons Oakville Grain Elevator as depicted here.