

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **08-04319**

- A. Source Description: FX Precoat Bag Dumping Station
- B. Facility Emissions and Attainment Status: Cargill is located in Montgomery County which is currently in attainment for all pollutants. Currently, Cargill is above 250 TPY for SO<sub>2</sub>, CO, and NO<sub>x</sub>.
- C. Source Emissions: The source has a before control PTE of 11.27 TPY PE, using a facility derived emission factor of 0.429 lb PE/ton material and the maximum capacity rate of 12000 lbs material processed per hour.
- D. Conclusion: By limiting the source to 160 tons material process per year and requiring the use of a baghouse, the emissions are negligible (< 0.01 TPY PE) and do not significantly add to the increments allowed before triggering a federal NSR review.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
MONTGOMERY COUNTY  
Application No: 08-04319**

**CERTIFIED MAIL**

**DATE:** 10/2/2001

Cargill Inc - Dayton  
Angie Duvall  
PO Box 1400A 3201 Needmore Rd  
Dayton, OH 454140000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA RAPCA Miami Valley Reg Plan Com KY IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 08-04319**

Application Number: 08-04319  
APS Premise Number: 0857041124  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Cargill Inc - Dayton  
Person to Contact: Angie Duvall  
Address: PO Box 1400A 3201 Needmore Rd  
Dayton, OH 454140000

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**3201 Needmore Rd  
Dayton, Ohio**

Description of proposed emissions unit(s):  
**increase allowable production throughput for P580; chapter 31 replacing 08-03290 issued 9-2-98.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

Cargill Inc - Dayton

Facility ID: 0857041124

PTI Application: 08-04319

Issued: To be entered upon final issuance

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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**PTI Application: 08-04319**

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### **15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

#### **B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

<b>SUMMARY (for informational purposes only)</b>	
<b>TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS</b>	
<u><b>Pollutant</b></u>	<u><b>Tons Per Year</b></u>
Particulate	<b>&lt; 0.01</b>

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P580 - FX Precoat Bag Dumping Station with Baghouse	OAC rule 3745-31-05 (A)(3)	0.013 lb particulate emissions (PE)/hr  10 % opacity, as a 6-minute average  The requirements of this rule include compliance with the requirements established of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	< 0.01 TPY PE  See Section B.1.
	OAC rule 3745-17-07(A)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The hourly limitation was established for PTI purpose to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

## B. Operational Restrictions

1. The maximum annual throughput of all precoat shall not exceed 160 TPY, as a rolling, 12-month summation.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following throughput:

<u>Months</u>	<u>Maximum Throughput of Precoat, in tons</u>
0-6	80
6-7	93.3
7-8	106.6
8-9	119.9
9-10	133.2
10-11	146.5
11-12	160

After the first 12 calendar months of operation following the effective date of this permit, the permittee shall comply with the annual throughput precoat limitation based upon rolling, 12-month summations.

3. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the purpose of determining annual compliance:
  - a. The name and identification of each precoat material processed;
  - b. The amount, in tons, of precoat material processed; and
  - c. The rolling, 12-month summation of precoat material processed.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with Section B.1. of the General Terms and Conditions of this permit which shall include the following information:
  - a. Each month during which the initial precoat process rate, for the first 12 calendar months of operation following the issuance of this permit, exceeded the maximum precoat throughput limitations specified above in Section B.2. and the actual combined precoat process rate;
  - b. Each month during which the total 12-month rolling, precoat process rate exceeded the 160 TPY, 12-month rolling summation and the actual 12-month rolling summation of precoat process rate; and
  - c. Each day during which the pressure drop across the baghouse did not comply with the allowable range specified above, and the corrective actions taken for each such day.

#### E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation -  
0.013 lb PE/hr  
  
Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly process rate, in tons, multiplied by the facility derived controlled emission factor of 0.002143 lb PE/ton precoat processed.
  - b. Emission Limitation -  
10 % opacity, as a 6-minute average  
  
Applicable Compliance Method -  
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
  - c. Emission Limitation -  
< 0.01 TPY PE

**Cargil****PTI A**Emissions Unit ID: **P580****Issued: To be entered upon final issuance**

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements as specified in Section C. and shall be multiplied by the facility derived controlled emission factor of 0.002143 lb PE/ton precoat processed and divided by 2000 lbs/ton.

- d. Throughput Limitation -  
160 TPY precoat, as a rolling 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements as specified in Section C.

**F. Miscellaneous Requirements**

None