**John R. Kasich**, Governor
**Mary Taylor**, Lt. Governor
**Scott J. Nally**, Director

8/27/2013

Certified Mail

Scott Millikan
Pioneer Hi-Bred International, Inc.
15180 Henry Wood County Road
Grand Rapids, OH 43522

| | |
|---|---|
| No | TOXIC REVIEW |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MODELING SUBMITTED |
| No | SYNTHETIC MINOR TO AVOID TITLE V |
| No | FEDERALLY ENFORCABLE PTIO (FEPTIO) |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0387002013
Permit Number: P0115156
Permit Type: OAC Chapter 3745-31 Modification
County: Wood

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

**How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

**How to give us feedback on your permitting experience**

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

**How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO

# FINAL

# Division of Air Pollution Control
# Permit-to-Install and Operate
for
Pioneer Hi-Bred International, Inc.

| | |
|---|---|
| Facility ID: | 0387002013 |
| Permit Number: | P0115156 |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Issued: | 8/27/2013 |
| Effective: | 8/27/2013 |
| Expiration: | 8/8/2017 |

**Division of Air Pollution Control**
**Permit-to-Install and Operate**
for
Pioneer Hi-Bred International, Inc.

**Table of Contents**


Authorization ..... 1

A. Standard Terms and Conditions ..... 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? ..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them? ..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ..... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator? ..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
15. What happens if a portion of this permit is determined to be invalid? ..... 7

B. Facility-Wide Terms and Conditions ..... 8

C. Emissions Unit Terms and Conditions ..... 10

1. P002, Treating and Packaging of Soybean and Wheat ..... 11

# Authorization

| | |
|---|---|
| Facility ID: | 0387002013 |
| Application Number(s): | A0048053 |
| Permit Number: | P0115156 |
| Permit Description: | Chapter 31 modification to the existing soybean and wheat seed conditioning operations to remodel portions of the facility's existing seed treatment and packaging system via installation of new process and control equipment and the replacement of existing process and control equipment. |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Permit Fee: | $900.00 |
| Issue Date: | 8/27/2013 |
| Effective Date: | 8/27/2013 |
| Expiration Date: | 8/8/2017 |
| Permit Evaluation Report (PER) Annual Date: | July 1 - June 30, Due Aug 15 |

This document constitutes issuance to:

Pioneer Hi-Bred International, Inc.
15180 Henry Wood Rd
Grand Rapids, OH 43522

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# Authorization (continued)

Permit Number: P0115156
Permit Description: Chapter 31 modification to the existing soybean and wheat seed conditioning operations to remodel portions of the facility's existing seed treatment and packaging system via installation of new process and control equipment and the replacement of existing process and control equipment.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

| | |
|---|---|
| **Emissions Unit ID:** | **P002** |
| Company Equipment ID: | Treating and Packaging |
| Superseded Permit Number: | P0109474 |
| General Permit Category and Type: | Not Applicable |

# A. Standard Terms and Conditions

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

# B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

# C. Emissions Unit Terms and Conditions

**1. P002, Treating and Packagingof Soybean and Wheat**

**Operations, Property and/or Equipment Description:**

This emissions unit is comprised of the following equipment: Treater Surge Bin, Treater, Treated/Untreated Seed Aspirators and Seed Bins, Treated/Untreated Bagging Scale Surge Bins, Treated/Untreated Bag Packaging and Jumbo Bag Packaging, Treated/Untreated ProBox Fill Surge Bins and ProBox Filling, Treated/Untreated Rebagging Surge Hopper/Dump Stations, Treated/Untreated Bag Splitters

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)(f). and d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(F) | <u>TreaterSurge Bin,Treater,Treated Seed Aspirator, Treated Seed Bins' Surge Hopper, Treated Seed Bins 1-4, Bag Splitter (Treated):</u><br><br>0.30 lb particulate emissions (PE)/hour, 1.32 tons PE/year<br><br>0.09 lb particulate matter 10 microns or less in diameter ($PM_{10}$)/hour, 0.41 ton $PM_{10}$/year<br><br>Visible PE from each stack serving this process shall not exceed 5% opacity, as a six-minute average |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | 5.91 lbs volatile organic compounds (VOC)/hour and 25.88 tons VOC/year<br><br>0.97 ton of any single hazardous air pollutant (HAP)/year and 1.01 tons of total HAPs/year<br><br><u>Untreated/Treated: Jumbo Bag Packaging, ProBox Fill Surge Bins, ProBox Filling, Rebagging Surge Hopper/Dump Stations, Bag Splitters:</u><br><br>0.40 lb PE/hour and 1.74 tons PE/year<br><br>0.20 lb $PM_{10}$/hour and 0.89 ton $PM_{10}$/year<br><br>Visible PE from each stack serving this process shall not exceed 0% opacity, as a six-minute average<br><br><u>Untreated Seed Aspirator, Untreated Seed Bins 1-4, Bagging Scale Surge Bins (Treated, Untreated), Bag Packaging (Treated, Untreated), Bag Splitter (Untreated):</u><br><br>0.44 lb PE/hour and 1.95 tons PE/year<br><br>0.16 lb $PM_{10}$/hour and 0.72 ton $PM_{10}$/year<br><br>Visible PE from each stack serving this process shall not exceed 5% opacity, as a six-minute average<br><br><u>Fluidized Bed Dryer/Conveyor:</u><br><br>0.04 lb PE/hour and 0.16 ton PE/year<br><br>0.02 lb $PM_{10}$/hour and 0.09 ton $PM_{10}$/year<br><br>Visible PE from each stack serving this process shall not exceed 0% opacity, as a six-minute average<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(A)(3), as | See b)(2)b. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | effective 11/30/01 | |
| c. | OAC rule 3745-31-05(A)(3), as effective 12/01/06 | See b)(2)c. |
| d. | OAC rule 3745-17-11(B) | See b)(2)d. |
| e. | OAC rule 3745-17-07(A) | See b)(2)e. |
| f. | OAC rule 3745-114-01 and ORC 3704.03(F) | See d)(3) |
| g. | ORC 3704.03(T) | See b)(2)f. |

(2) Additional Terms and Conditions

a. This permit establishes legally and practically enforceable emission limitations under OAC rule 3745-31-05(F) for the purpose of establishing potential to emit (PTE). The legally and practically enforceable emission limitations are based on operational restrictions contained in c)(1).

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/2001 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

It should be noted that the voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/2006 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that does not involve an established NAAQS.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the $PM_{10}$ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

d. The emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).

e. The visible emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).

f. The Best Available Technology (BAT) requirements for VOC emissions under this rule have been determined to be in compliance with OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:

a. the use of a baghouse system, dust filtration system or comparable control equipment, whenever this air contaminant source is in operation, with a minimum control efficiency of 98%, by weight for PE.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the amount of throughput from the equipment (in tons per month and total tons, to date for the calendar year).

(2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

(3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year based on the information provided in the application. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO. In lieu of an application, the permittee may submit air toxics modeling which demonstrates compliance with the "Toxic Air Contaminant Statute".

(4) The permittee shall collect and record the following information each month for the treatments applied by the treater:

a. the company identification for each VOC- and/or HAP-containing material;

b. the total and individual VOC and HAP content of each VOC- or HAP-containing material;

c. the amount of each VOC- or HAP-containing material applied during the previous calendar month;

d. the total emissions from each individual HAP from all HAP-containing materials applied during the previous calendar month, recorded in pounds or tons per month;

e. the total VOC and total HAP emissions from all VOC- or HAP-containing materials applied during the previous calendar month, recorded in pounds or tons per month;

f. the annual summation of total HAP and each individual HAP from all HAP-containing materials applied, recorded in tons per year; and

g. the annual summation of VOC emissions from all VOC-containing materials applied, recorded in tons per year.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

(2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term d)(2) above:

a. all events during which any visible particulate emissions were observed from the stacks serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

(3) The above information shall be provided as an attachment to the PER. If there were no event(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:
0.30 lb/hr, 1.32 tons/yr PE; 0.09 lb/hr, 0.41 ton/yr $PM_{10}$ from treater surge bin, treater, treated seed aspirator, treated seed bins' surge hopper, treated seed bins 1-4, treated bag splitter 0.40 lb/hr, 1.74 tons/yr PE; 0.20 lb/hr, 0.89 tons/yr $PM_{10}$ from the treated/untreated jumbo bag packaging, ProBox fill surge bins, ProBox filling, rebagging surge hopper/dump stations and bag splitters 0.44 lb/hr, 1.95 tons/yr PE; 0.16 lb/hr, 0.72 ton/yr $PM_{10}$ from the untreated seed aspirator, untreated seed bins 1-4, bagging scale surge bins (treated/untreated), bag packaging (treated/untreated), bag splitter (untreated) 0.04 lb/hr, 0.16 ton/yr PE; 0.02 lb/hr, 0.09 ton/yr $PM_{10}$ from the fluidized bed dryer/conveyor

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* of the emission unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with the emissions limitations.

*The potential to emit is based on multiplying the corresponding AP-42 emission factor (Section 9.9.1 (3/2003)) by the corresponding maximum hourly and annual throughputs of seed and (1 - 0.98) as the control efficiency for the control system:

| Equipment | PE Emission Factor<br>$PM_{10}$ Emission Factor | Hourly Process Rate (tons) | Annual Process Rate (tons) |
|---|---|---|---|
| Treater Surge Bin | 0.025 lb/ton<br>0.0063 lb/ton | 30 | 262,800 |
| Treater | 0.061 lb/ton<br>0.034 lb/ton | 30 | 262,800 |
| Fluidized Bed Dryer/Conveyor | 0.061 lb/ton<br>0.034 lb/ton | 30 | 262,800 |
| | | | |

| Equipment | PE Emission Factor<br>$PM_{10}$ Emission Factor | Hourly Process Rate (tons) | Annual Process Rate (tons) |
|---|---|---|---|
| Untreated Seed Aspirator | 0.500 lb/ton<br>0.127 lb/ton | 18 | 157,680 |
| Treated Seed Aspirator | 0.500 lb/ton<br>0.127 lb/ton | 18 | 157,680 |
| Untreated Seed Bins 1-4 | 0.025 lb/ton<br>0.0063 lb/ton | 72 | 630,720 |
| Treated Seed Bins' Surge Hopper | 0.025 lb/ton<br>0.0063 lb/ton | 48 | 420,480 |
| Treated Seed Bins 1-4 | 0.025 lb/ton<br>0.0063 lb/ton | 48 | 420,480 |
| Bagging Scale Surge Bins (Treated/Untreated) | 0.025 lb/ton<br>0.0063 lb/ton | 120 | 1,051,200 |
| Bag Packaging (Treated/Untreated) | 0.061 lb/ton<br>0.034 lb/ton | 120 | 1,051,200 |
| Jumbo Bag Packaging (Treated/Untreated) | 0.061 lb/ton<br>0.034 lb/ton | 120 | 1,051,200 |
| ProBox Fill Surge Bins (Treated/Untreated) | 0.025 lb/ton<br>0.0063 lb/ton | 120 | 1,051,200 |
| ProBox Filling (Treated/Untreated) | 0.061 lb/ton<br>0.034 lb/ton | 120 | 1,051,200 |
| Rebagging Surge Hopper/Dump Station (Treated/Untreated) | 0.061 lb/ton<br>0.034 lb/ton | 36 | 315,360 |
| Bag Splitters (Untreated) | 0.061 lb/ton<br>0.034 lb/ton | 18 | 157,680 |
| Bag Splitters (Treated) | 0.061 lb/ton<br>0.034 lb/ton | 18 | 157,680 |

If required, compliance with the PE hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Method 5 of 40 CFR, Part 60, Appendix A. If required, compliance with the $PM_{10}$ hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

Compliance with the annual emissions limitation shall be demonstrated provided compliance is shown with the annual process rate.

b. Emission Limitation: 5.91 lbs of VOC per hour and 25.88 tons of VOC per year from the treater

Applicable Compliance Method:
The hourly emission rate represents the potential to emit* of the emission unit.

*The potential to emit is based on the maximum hourly throughput of 30 tons of grain.

Compliance with the annual limit shall be based on the recordkeeping requirements established in section d)(4) of this permit.

c. Emission Limitation: 0.97 ton of any single hazardous air pollutant (HAP) per year; 1.01 tons of all HAPs per year from the treater

Applicable Compliance Method:
Compliance with the annual limits shall be based on the recordkeeping requirements established in section d)(4) of this permit.

d. Emission Limitation: Visible particulate emissions from any stack serving the Jumbo Bag Packaging, ProBox Fill Surge Bins, ProBox Filling, Rebagging Surge Hopper/Dump Stations, Bag Splitter (Untreated) and Fluidized Bed Dryer/Conveyor shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method:
If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

e. Emission Limitation: Visible particulate emissions from any stack serving the Treater Surge Bin, Treater, Seed Bins, Seed Aspirators, Bagging Scale Surge Bins, Bag Packaging and Bag Splitter (Untreated) shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:
If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) The permittee has committed to using a control system that has at least 98% control efficiency of PE. Any control system can be replaced with another control system that is as efficient provided that prior notification is made to the Director (the Northwest District Office). The following table details the existing control equipment:

| **Equipment** | **Control Equipment ID(s)** |
|---|---|
| Treater Surge Bin | Treater System Dust Filter |
| Treater | Treater System Dust Filter |
| Fluidized Bed Dryer/Conveyor | Fluidized Bed Dryer Filter |
| Untreated Seed Aspirator | Red Dust Filter 76700 |
| Treated Seed Aspirator | Treater System Dust Filter |
| Untreated Seed Bins 1-4 | Red Dust Filter 76700 |
| Treated Seed Bins' Surge Hopper | Treater System Dust Filter |
| Treated Seed Bins 1-4 | Treater System Dust Filter |
| Bagging Scale Surge Bins (Treated/Untreated) | Red Dust Filter 76700 |
| Bag Packaging (Treated/Untreated) | Red Dust Filter 76700 |
| Jumbo Bag Packaging (Treated/Untreated) | Packaging ToritBaghouse |
| ProBox Fill Surge Bins (Treated/Untreated) | Packaging ToritBaghouse |
| ProBox Filling (Treated/Untreated) | Packaging ToritBaghouse |
| Rebagging Surge Hopper/Dump Stations (Treated/Untreated) | Packaging ToritBaghouse |
| Bag Splitter (Untreated) | Red Dust Filter 76700 |

| **Equipment** | **Control Equipment ID(s)** |
|---|---|
| Bag Splitter (Treated) | Treater System Dust Filter |