



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04145

DATE: 6/10/2003

Cargill, Incorporated -- Salt Division
Mike Nevlon
Post Office Box 6920
Cleveland, OH 441016920

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 6/10/2003
Effective Date: 6/10/2003**

FINAL PERMIT TO INSTALL 13-04145

Application Number: 13-04145
APS Premise Number: 1318000397
Permit Fee: **\$1000**
Name of Facility: Cargill, Incorporated -- Salt Division
Person to Contact: Mike Nevlon
Address: Post Office Box 6920
Cleveland, OH 441016920

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2400 Ship Channel
Cleveland, Ohio**

Description of proposed emissions unit(s):
Mix and fines crushing operation -- P001.

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

Director

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

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 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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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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.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	0.5

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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.

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

P001 - Salt processing operation OAC rule 3745-31-05 (A)(3)
for mix and fines

OAC rule 3745-17-08 (B)

40 CFR Part 60 Subpart OOO

OAC rule 3745-17-07 (B)(1)

Applicable Emissions
Limitations/Control Measures

0.11 lb/hour of PE emissions
0.5 ton/year of PE emissions

Visible fugitive particulate emissions shall not exceed ten percent opacity as a three-minute average for conveyors and screeners located outside of the buildings, and shall not exceed a seven percent opacity as a three-minute average for vents exhausting from buildings (also see A.2.c and A.2.d below).

Best available control measures (see A.2.b below) that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust from any fugitive dust emission point listed below in A.2.a..

The visible particulate emission limitations specified by this rule are equivalent to or less stringent than the visible particulate emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

The visible fugitive particulate emission limitation specified by this rule is less stringent than the visible fugitive particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** This emissions unit system consists of the following equipment and fugitive dust emission points:
- (1) Gundlach Crusher
 - (1) Megatex screener
 - (1) Rotex screener
 - (31) Transfer Points
- 2.b** The permittee shall employ best available control measures for the mix and fines operation for the purpose of ensuring compliance with the applicable requirements. In accordance with the permittee's permit application, the permittee has committed to enclosing all the conveyor belts and installing enclosed shoots between transfer points along the conveyors and elevators within the process to ensure compliance. A dust collector shall be installed to capture fugitive emissions from transfer points in the operation process located in the Vacuum Warehouse. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions except emissions from a vent. Per 40 CFR Part 60 Subpart OOO, vent means an opening through which there is mechanically induced air flow for the purpose of exhausting from a building air carrying particulate matter emissions from one or more affected facilities.
- 2.d** No owner or operator shall cause to be discharged into the atmosphere from any vent of any building enclosing any transfer point on a conveyor belt or any other affected facility visible particulate emissions which exceed 7 percent opacity as a six-minute average.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the vent(s) serving this emissions unit, and for any visible fugitive particulate emissions from the screens and conveyors located outside of buildings. 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. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these Terms and Conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
10% opacity as a three-minute average (for conveyors and screeners located outside building)

Applicable Compliance Method

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(3) in addition to the following:

- i. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
- ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer

position relative to the sun (Method 9, Section 2.1) must be followed.

- b. Emission Limitation
7% opacity as a three-minute average (for vents exhausting from buildings)

Applicable Compliance Method

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

- c. Emission Limitation
0.11 lb/hr of PM emissions

Applicable Compliance Method

Compliance with the hourly PM emission limitation shall be determined using the emission factors for crushing, screening, and material handling operations in AP-42 "Compilation of Air Pollutant Emission Factors", Chapter 11.19.2 (Crushed Stone Processing), Fifth Edition, dated 1/1995. Materials from transfer points shall use 0.0014 as the emission factor, materials from the screening operation shall use 0.0150, and materials from the crushing operation shall use 0.007. The emission factors, in lbs PE/ton of material processed, shall be multiplied by the maximum process weight rate, in tons/hr, for each operation and then multiply by the capture and control efficiencies noted below. Then sum the results for all operations to determine the total amount of emissions.

From the permittee's application, with the following exceptions all of the conveyors, screens, and transfer points have 100% enclosure and do not contribute to the fugitive emissions. The only emission points are the following: Gundlach Crusher which has 100% capture and 99% control for the cartridge filter; transfer point AL and BD to AK has 100% capture and 99% control for the cartridge filter; and transfer points BI to BJ and BJ to BL which has 85% capture and 99% control for the cartridge filter. These capture and control efficiencies should be applied to the emission calculations using the AP-42 emission factors noted above. All emissions are fugitive since the dust collectors are vented inside the buildings.

- d. Emission Limitation
0.5 TPY of PM emissions

Applicable Compliance Method

The TPY limitation was developed by multiplying the lb/hr by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

F. Miscellaneous Requirements

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1. This source is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60 Subpart OOO.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 Subpart OOO are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. actual start up date (within 15 days after such date); and both the home office and the current address or location of the portable plant and;
- c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
CDAQ; Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

and

The Cleveland Division of Air Quality
Department of Public Health
1925 St. Clair Avenue
Cleveland, Ohio 44114-

2. When determining compliance with the fugitive emissions standard for any crusher at which a capture system is not used as described under 60.672(c) of 40 CFR Part 60, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6 minute averages) to 1 hour (ten 6 minute averages) only if the following conditions apply:
 - a. There are no individual readings greater than 15 percent opacity; and
 - b. There are no more than 3 readings of 15 percent for the 1 hour period.

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