



State of Ohio Environmental Protection Agency

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

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: 13-04584
Fac ID: 1318000397**

DATE: 2/14/2006

Cargill, Incorporated -- Salt Division
Russ Givens
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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 2/14/2006
Effective Date: 2/14/2006**

FINAL PERMIT TO INSTALL 13-04584

Application Number: 13-04584
Facility ID: 1318000397
Permit Fee: **\$1250**
Name of Facility: Cargill, Incorporated -- Salt Division
Person to Contact: Russ Givens
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):
42-Inch belt conveyor with two conveyor-to-conveyor transfer points -- F010.

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 record keeping 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 record keeping 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

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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)

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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.

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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.

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>
PE	2.72
PM ₁₀	0.92

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.

OAC rule 3745-17-08(B)(3)

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

F010 - a new 42 inch wide, 357 feet long covered belt conveyor #1A (including two transfer points totally enclosed inside existing buildings and with closed man-doors on the belt covers for maintenance) for transferring mined rock salt from conveyor 1 (Production Headframe structure) to the bin area shuttle conveyor (Vacuum Warehouse Building).

OAC rule 3745-31-05(A)(3)

40 CFR Part 60, Subpart 000

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

Applicable Emissions
Limitations/Control Measures

Fugitive dust emissions (PM) from this emissions unit shall not exceed 0.62 lb/hour and 2.72 tons per year (TPY).

Fugitive particulate matter emissions less than 10 microns in diameter (PM₁₀) from this emissions unit shall not exceed 0.21 lb/hour and 0.92 TPY.

The permittee shall not cause to be discharged into the atmosphere any visible fugitive emissions from any non-stack egress point(s) on the belt covers or on any buildings enclosing the transfer points of the conveyor belt. No vents are provided on any of the enclosed buildings at this emissions unit.

The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust. See A.1.2.b below.

The visible fugitive emission limitation specified by this rule is less stringent than the visible 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).

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

2. Additional Terms and Conditions

- 2.a** The operation covered by this permit and subject to the above Ohio Administrative Code (OAC) rules and 40 CFR 60 Subpart OOO is the operation of the new 42 inch wide, 357 foot long covered belt conveyor #1A (including two transfer points totally enclosed inside existing buildings and closed man-doors on the belt covers for maintenance) for transferring mined rock salt from conveyor 1 (Production Headframe structure) to the bin area shuttle conveyor (Vacuum Warehouse Building).
- 2.b** The permittee shall employ the best available control measures for the prevention of fugitive emissions from the operation of the belt conveyor and the transfer points totally enclosed in the buildings for the purpose of ensuring compliance with the above mentioned applicable requirements. Best available control measures shall include but shall not be limited to not overloading the conveyor belt, keeping the drop heights at the transfer points to a minimum and maintaining the building enclosures in a condition conducive to the prevention of fugitive emissions. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The pound/hour and ton(s)/year emission limits have been established at potential to emit; therefore, monitoring, recordkeeping, and reporting are not needed for these limits.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

- 1.** The permittee shall perform weekly checks, when the emissions unit is processing materials and when the weather conditions allow, for any visible emissions of fugitive dust (excluding uncombined water vapor) from the non-stack egress points (e.g., points of exit and entry of conveyor out of and into buildings, windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be recorded electronically or in an operations log. If visible emissions are observed, the permittee shall also record the following:
- a.** The location and color of the emissions;

- b. The total duration of any visible emission incident; and
- c. Any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, modify the above-mentioned inspection frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

D. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that:
 - a. Identify all days during which any visible emissions of fugitive dust were observed from the non-stack egress points serving this emissions unit; and
 - b. Describe any corrective actions taken to eliminate the visible emissions.

These reports shall be submitted to the Cleveland Division of Air Quality by January 31 and July 31 of each year and shall cover the previous 6-month calendar period.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Fugitive PM emissions from this emissions unit shall not exceed 0.62 lb/hour.

Applicable Compliance Method:

The pound per hour limit was established from the AP-42, Compilation of Air Pollutant Emission Factors, Volume 1, Fifth Edition, (August 2004), Table 11.19.2-2, Section 11.19.2-8 emission factor in accordance with the following calculation:

$$= 0.00014 \text{ (lb PM/ton)} * 2200 \text{ (tons/hr)} * 2 \text{ transfer points} = 0.616 \text{ lb/hr} = 0.62 \text{ lb/hr}$$

Multiply the actual salt conveyance rate in tons/hour by the emission factor 0.00014 lb PE/ton of salt conveyed and the two (2) transfer points to get the actual PM rate/hour.

- b. Emission Limitation:
Fugitive PM emissions from this emissions unit shall not exceed 2.72 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

- c. Emission Limitation:
Fugitive PM₁₀ emissions from this emissions unit shall not exceed 0.21 lb/hour.

Applicable Compliance Method:

The pound per hour limit was established from the AP-42, Compilation of Air Pollutant Emission Factors, Volume 1, Fifth Edition, (August 2004), Table 11.19.2-2, Section 11.19.2-8 emission factor in accordance with the following calculation:

$$= 0.000046 \text{ (lb PM}_{10}\text{/ton)} * 2200 \text{ (tons/hr)} * 2 \text{ transfer points} = 0.2024 \text{ lb/hr} = 0.21 \text{ lb/hr}$$

Multiply the actual salt conveyance rate in tons/hour by the emission factor 0.000046 lb PM₁₀/ton of salt conveyed and the two (2) transfer points to get the actual PE rate/hour.

- d. Emission Limitation:
Fugitive PM₁₀ emissions from this emissions unit shall not exceed 0.92 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

- e. **Emission Limitation:**
There shall be no visible fugitive emissions from any non-stack egress point(s) on the conveyor belt covers or on the buildings enclosing the transfer points of the conveyor belt.

Applicable Compliance Method:

Compliance with the visible fugitive particulate emission limitation for non-stack egress points on the conveyor belt covers or on the buildings enclosing the transfer points identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months after beginning full-time operation of the emissions unit

Subsequent performance tests to demonstrate compliance with the fugitive opacity limits shall be conducted no less frequently than once every 6 months.

The emission testing shall be conducted to demonstrate compliance with the allowable fugitive emission opacity limitation.

The following test method shall be employed to demonstrate compliance with the allowable fugitive emission opacity limitation:

opacity: Method 22 of 40 CFR Part 60, Appendix A;

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

F. Miscellaneous Requirements

None