



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: 13-04688**

**Fac ID: 1318000397**

**DATE: 12/7/2006**

Cargill, Incorporated -- Salt Division  
Bryce Ormiston  
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 of the Director is final 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 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  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

CLAA



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**Permit To Install  
Terms and Conditions**

**Issue Date: 12/7/2006  
Effective Date: 12/7/2006**

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**FINAL PERMIT TO INSTALL 13-04688**

Application Number: 13-04688  
Facility ID: 1318000397  
Permit Fee: **\$400**  
Name of Facility: Cargill, Incorporated -- Salt Division  
Person to Contact: Bryce Ormiston  
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):  
**Installation of conveyor belt system for two rock salt storage buildings**

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 (i.e., postmarked) quarterly 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>
PM	10.0
PM <sub>10</sub>	10.0

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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 - (F011) - Enclosed Rock Salt Conveyor System serving the south storage building 2 - One 128 ft x 36 inch load-in belt (belt 13); and one 222 ft x 54 inch load-out belt (belt 14)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	<p>Fugitive dust emissions (PM) from this emissions unit shall be less than 10.0 tons per year.</p> <p>Fugitive particulate matter emissions less than 10 microns in diameter (PM<sub>10</sub>) from this emissions unit shall be less than 10.0 tons per year.</p> <p>See A.2.a below.</p>
OAC rule 3745-17-07(B)(1)	The emission limitations and opacity restrictions specified by this rule are less stringent than the emission limitations established pursuant to 40 CFR Part 60, Subpart OOO.
OAC rule 3745-17-08(B)(3)	The emission limitations and opacity restrictions specified by this rule are less stringent than the emission limitations established pursuant to 40 CFR Part 60, Subpart OOO.
40 CFR Part 60, Subpart OOO	See A.2.b below.
ORC 3704.03(T)(4)	See A.2.c below.

**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 enclosed rock salt conveyor system serving the south storage building 2 consisting of one 128 ft x 36 inch load-in belt (belt 13); and one 222 ft x 54 inch load-out belt (belt 14).

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- 2.b** 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.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM and PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit for PM and PM<sub>10</sub> emissions are less than 10.0 tons per year.
- 2.d** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping 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

Emissions Unit ID: F011

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 dust emissions (PM) from this emissions unit shall be less than 10.0 tons per year.

Applicable Compliance Method:

Emissions shall be calculated and compliance determined by using the following equations:

$$\text{lbs PM/hr} = [(A)*(B)*(C)] + [(A)*(D)*(E)]$$

where,

A = Particulate emissions factor for controlled conveyer transfer point, pounds per ton of material throughput, from AP-42, Section 11.19.2, (August, 2004).

B = Total hourly throughput for Belt #13, in tons.

C = Total number of transfer points on Belt #13.

D = Total hourly throughput for Belt #14, in tons.

E = Total number of transfer points on Belt #14.

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The annual emissions shall be determined by multiplying the hourly emissions rate by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

- b. Emission Limitation:  
Fugitive PM<sub>10</sub> emissions from this emissions unit shall be less than 10.0 tons per year.

Applicable Compliance Method:

Emissions shall be calculated and compliance determined by using the following equations:

$$\text{lbs PM}_{10}/\text{hr} = [(A)*(B)*(C)] + [(A)*(D)*(E)]$$

where,

A = PM<sub>10</sub> emissions factor for controlled conveyer transfer point, pounds per ton of material throughput, from AP-42, Section 11.19.2, (August, 2004).

B = Total hourly throughput for Belt #13, in tons.

C = Total number of transfer points on Belt #13.

D = Total hourly throughput for Belt #14, in tons.

E = Total number of transfer points on Belt #14.

The annual emissions shall be determined by multiplying the hourly emissions rate by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

- c. 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

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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:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
  - b. Subsequent performance tests to demonstrate compliance with the fugitive opacity limits shall be conducted no less frequently than once every 6 months.
  - c. The emission testing shall be conducted to demonstrate compliance with the allowable fugitive emission opacity limitation.

Emissions Unit ID: **F011**

- d. 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.

- e. 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.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland Division of Air Quality. 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 Division of Air Quality's refusal to accept the results of the emission test(s).
- g. Personnel from the Cleveland Division of Air Quality 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.
- h. 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 Division of Air Quality 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 Division of Air Quality.

## **F. Miscellaneous Requirements**

None

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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 - (F012) - Enclosed Rock Salt Conveyor System serving the north storage building 1 - One 128 ft x 36 inch load-in belt (belt 15); one 188 ft x 54 inch load-out belt (belt 17); and one 140 ft x 54 inch transfer belt conveyor (belt 18)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	<p>Fugitive dust emissions (PM) from this emissions unit shall be less than 10.0 tons per year.</p> <p>Fugitive particulate matter emissions less than 10 microns in diameter (PM<sub>10</sub>) from this emissions unit shall be less than 10.0 tons per year.</p> <p>See A.2.a below.</p>
OAC rule 3745-17-07(B)(1)	The emission limitations and opacity restrictions specified by this rule are less stringent than the emission limitations established pursuant to 40 CFR Part 60, Subpart OOO.
OAC rule 3745-17-08(B)(3)	The emission limitations and opacity restrictions specified by this rule are less stringent than the emission limitations established pursuant to 40 CFR Part 60, Subpart OOO.
40 CFR Part 60, Subpart OOO	See A.2.b below.
ORC 3704.03(T)(4)	See A.2.c below.

**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 enclosed rock salt conveyor system serving the north storage building 1 - One 128 ft x 36 inch load-in belt (belt 15); one 188 ft x 54 inch load-out belt (belt 17); and one 140 ft x 54 inch transfer belt conveyor (belt 18).

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DTI Application: 12 04699

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**Emissions Unit ID: F012**

Emissions Unit ID: **F012**

- 2.b** 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.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM and PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit for PM and PM<sub>10</sub> emissions are less than 10.0 tons per year.
- 2.d** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping 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:
- The location and color of the emissions;
  - The total duration of any visible emission incident; and
  - 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.

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**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 dust emissions (PM) from this emissions unit shall be less than 10.0 tons per year.

Applicable Compliance Method:

Emissions shall be calculated and compliance determined by using the following equations:

$$\text{lbs PM/hr} = [(A)*(B)*(C)] + [(A)*(D)*(E)] + [(A)*(F)*(G)]$$

where,

- A = Particulate emissions factor for controlled conveyer transfer point, pounds per ton of material throughput, from AP-42, Section 11.19.2, (August, 2004).
- B = Total hourly throughput for Belt #15, in tons.
- C = Total number of transfer points on Belt #15.
- D = Total hourly throughput for Belt #17, in tons.
- E = Total number of transfer points on Belt #17.

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F = Total hourly throughput for Belt #18, in tons.

G = Total number of transfer points on Belt #18.

The annual emissions shall be determined by multiplying the hourly emissions rate by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

b. Emission Limitation:

Fugitive PM<sub>10</sub> emissions from this emissions unit shall be less than 10.0 tons per year.

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Applicable Compliance Method:

Emissions shall be calculated and compliance determined by using the following equations:

$$\text{lbs PM}_{10}/\text{hr} = [(A)*(B)*(C)] + [(A)*(D)*(E)] + [(A)*(F)*(G)]$$

where,

A = PM<sub>10</sub> emissions factor for controlled conveyer transfer point, pounds per ton of material throughput, from AP-42, Section 11.19.2, (August, 2004).

B = Total hourly throughput for Belt #15, in tons.

C = Total number of transfer points on Belt #15.

D = Total hourly throughput for Belt #17, in tons.

E = Total number of transfer points on Belt #17.

F = Total hourly throughput for Belt #18, in tons.

G = Total number of transfer points on Belt #18.

The annual emissions shall be determined by multiplying the hourly emissions rate by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

## c. 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:

Emissions Unit ID: **F012**

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. Subsequent performance tests to demonstrate compliance with the fugitive opacity limits shall be conducted no less frequently than once every 6 months.
- c. The emission testing shall be conducted to demonstrate compliance with the allowable fugitive emission opacity limitation.
- d. 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.

- e. 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.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland Division of Air Quality. 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 Division of Air Quality's refusal to accept the results of the emission test(s).
- g. Personnel from the Cleveland Division of Air Quality 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.
- h. 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 Division of Air Quality within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written

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report, where warranted, with prior approval from the Cleveland Division of Air Quality.

**F. Miscellaneous Requirements**

None

Emissions Unit ID: **F012**

SIC CODE 1476 SCC CODE 3-05-020-06 EMISSIONS UNIT ID F011

EMISSIONS UNIT DESCRIPTION Enclosed Rock Salt Conveyor System serving the south storage building 2 - One 128 ft x 36 inch load-in belt (belt 13); and one 222 ft x 54 inch load-out belt (belt 14)

DATE INSTALLED Construction begins January 2008 (est.)

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.73 lbs/hr	3.19	0.73 lbs/hr	10
PM <sub>10</sub>	Non-Attainment	0.24 lbs/hr	1.05	0.24 lbs/hr	10
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 000 NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT Exempt since emissions unit has a potential to emit less than 10 tons per year. However, containment of conveyors and associated transfer points with enclosure shall be used to minimize fugitive PM emissions.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**Cargill, Incorporated -- Salt Division**  
**PTI Application: 13-04688**  
**Issued: 12/7/2006**

**Facility ID: 1318000397**

Emissions Unit ID: **F012**

SIC CODE 1476 SCC CODE 3-05-020-06 EMISSIONS UNIT ID F012  
 EMISSIONS UNIT DESCRIPTION Enclosed Rock Salt Conveyor System serving the north storage building 1 - One 128 ft x 36 inch load-in belt (belt 15); one 188 ft x 54 inch load-out belt (belt 17); and one 140 ft x 54 inch transfer belt conveyor (belt 18)  
 DATE INSTALLED Construction begins June 2007

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	1.35 lbs/hr	2.97	32.26 lbs/hr	10
PM <sub>10</sub>	Non-Attainment	0.45 lbs/hr	1.45	10.60 lbs/hr	10
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 000

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**BAT Exempt since emissions unit has a potential to emit less than 10 tons per year. However, containment of conveyors and associated transfer points with enclosure shall be used to minimize fugitive PM emissions.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_