



2/10/2014

Certified Mail

Mr. Justin Tazzi
Mondelez Global LLC - Toledo Flour Mill
2221 Front Street
Toledo, OH 43605

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448010023
Permit Number: P0114669
Permit Type: Renewal
County: Lucas

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/survey.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 Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: TDES



Response to Comments

Facility ID:	0448010023
Facility Name:	Mondelez Global LLC - Toledo Flour Mill
Facility Description:	Toledo Flour Mill
Facility Address:	2221 Front Street Toledo, OH 43605 Lucas County
Permit:	P0114669, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 01/08/2014. The comment period ended on 02/07/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: No Comments Received

- a. Comment: None
- b. Response: None



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Mondelez Global LLC - Toledo Flour Mill**

Facility ID:	0448010023
Permit Number:	P0114669
Permit Type:	Renewal
Issued:	2/10/2014
Effective:	2/10/2014
Expiration:	10/19/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
Mondelez Global LLC - Toledo Flour Mill

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Final Permit-to-Install and Operate
Mondelez Global LLC - Toledo Flour Mill
Permit Number: P0114669
Facility ID: 0448010023
Effective Date: 2/10/2014

Authorization

Facility ID: 0448010023
Application Number(s): A0047478, A0048849
Permit Number: P0114669
Permit Description: Renewal of federally enforceable operating permit for a grain terminal elevator and flour mill.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 2/10/2014
Effective Date: 2/10/2014
Expiration Date: 10/19/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Mondelez Global LLC - Toledo Flour Mill
2221 Front Street
Toledo, OH 43605

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

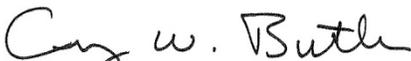
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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


Craig W. Butler
Interim Director



Authorization (continued)

Permit Number: P0114669
 Permit Description: Renewal of federally enforceable operating permit for a grain terminal elevator and flour mill.

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

- | | |
|-----------------------------------|----------------------------|
| Emissions Unit ID: | F008 |
| Company Equipment ID: | Roadways |
| Superseded Permit Number: | P0088071 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F013 |
| Company Equipment ID: | F013 |
| Superseded Permit Number: | 04-01489 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P009 |
| Company Equipment ID: | Grain screening & cleaning |
| Superseded Permit Number: | P0088071 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P013 |
| Company Equipment ID: | Flour mill 'A' |
| Superseded Permit Number: | 04-040 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P014 |
| Company Equipment ID: | Flour mill 'B' |
| Superseded Permit Number: | 04-040 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P016 |
| Company Equipment ID: | Grain handling |
| Superseded Permit Number: | P0088071 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P900 |
| Company Equipment ID: | Truck dump - Wheat |
| Superseded Permit Number: | P0088071 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
Mondelez Global LLC - Toledo Flour Mill
Permit Number: P0114669
Facility ID: 0448010023
Effective Date: 2/10/2014

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 taken by 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 of this permit 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 [DO/LAA] 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 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 emission 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.



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.



Final Permit-to-Install and Operate
Mondelez Global LLC - Toledo Flour Mill
Permit Number: P0114669
Facility ID: 0448010023
Effective Date: 2/10/2014

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) B.2.
2. Facility-wide grain receiving rate restriction
 - a) The combined weight of grain received by emissions units P900, P901, and F013 shall not exceed 1,265,000 tons per rolling, 12-month period.
 - b) The permittee shall maintain monthly records of the following information:
 - (1) the tons of grain received at emissions units P900, P901, and F013 combined for each month; and
 - (2) the rolling, 12-month summation of the tons of grain received at emissions units P900, P901, and F013 combined.
 - c) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - a. the combined amount of grain received by emissions units P900, P901, and F013 shall not exceed 1,265,000 tons per rolling, 12-month period;
 - (i) the probable cause of each deviation (excursion);
 - (ii) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (iii) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.



Final Permit-to-Install and Operate
Mondelez Global LLC - Toledo Flour Mill
Permit Number: P0114669
Facility ID: 0448010023
Effective Date: 2/10/2014

C. Emissions Unit Terms and Conditions



1. F008, Roadways

Operations, Property and/or Equipment Description:

Paved Roadways and Parking Areas

- 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. None.
 - (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 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.
b.	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
c.	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)b. through b)(2)f.



(2) Additional Terms and Conditions

- a. The paved and unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

all paved and unpaved roadways and parking areas.
- b. The permittee shall employ reasonably available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to low speed, good housekeeping, sweeping, and surface improvements at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. Any paved and unpaved roadway or parking area which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to visible emissions limitations for paved roadways.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>roadways and parking areas</u>	<u>minimum inspection frequency</u>
allpaved and unpaved roads and parking areas	daily



- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. No inspection is required on any day that the road is not used. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation, or lack of road use;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
 - (4) The information required in Term d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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. The permittee shall identify any of the following occurrences in the annual permit evaluation report:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



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 Limitation:

No visible particulate emissions from paved roadways and parking areas except for a period of time not to exceed one minute during any 60-minute observation period. No visible particulate emissions from unpaved roadways and parking areas except for a period of time not to exceed three minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed 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") and the modifications specified in OAC rule 3745-17-03(B)(4). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.



2. F013, F013

Operations, Property and/or Equipment Description:

barge and ship unloading

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. None.

(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. b)(1)c., b)(2)e., c)(1), d)(1), d)(2), e)(1), f)(1)e., and f)(1)f.

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(A)(3), as effective 11/30/2001	Particulate emissions (PE) from all stacks serving this emissions unit shall not exceed 1.10 pounds per hour. Particulate matter emissions less than or equal to 10 microns in diameter (PM10) from all stacks serving this emissions unit shall not exceed 0.28 pound per hour. see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)c. and b)(2)d.
c.	OAC rule 3745-31-05(D)	PE from this emissions unit shall not exceed 2.83 tons per rolling, 12-month period. PM10 emissions from this emissions unit shall not exceed 0.72 ton per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see b)(2)e.
d.	OAC rule 3745-17-07(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficiency to minimize or eliminate visible emissions of fugitive dust see b)(2)f.
f.	40 CFR Part 60, Appendix A (40 CFR 60.1 – 60.19)	see b)(2)g.
g.	40 CFR Part 60, Subpart DD (40 CFR 60.300 – 60.304) [In accordance with 40 CFR 60.300 this emissions unit is a barge and ship unloading station installed after August 3, 1978 at a grain terminal elevator with a permanent storage capacity of more than 2.5 million bushels and is subject to the requirements of the rule]	Particulate emissions from any stack serving this emissions unit shall not exceed 0.023 g/dscm(0.01 gr/dscf) and 0% opacity as a 6-minute average. (40 CFR 60.302(b)) The fugitive emission limitation specified by this rule is less stringent than that specified by OAC rule 3745-31-05(D). (40 CFR 60.302(c)(4)) see b)(2)h.

(2) Additional Terms and Conditions

- a. Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 34745-31-05(D).
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not 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 limits/control measures no longer apply.
- 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.



- d. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to controlled PM10 emissions from this air contaminant source since the controlled potential to emit for PM10 when taking in to consideration the federally enforceable restrictions specified under OAC rule 3745-31-05(D) is less than 10 tons per year.
 - e. Permit to Install and Operate P0114669 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. adequate enclosure of the ship unloading process;
 - ii. operation of an integral dust control system with inherent capture efficiency of 98% for PE and PM10;
 - iii. operation of an integral dust control system with a minimum control efficiency of 99% for PE and PM10;
 - iv. visible fugitive particulate emissions from any egress serving this emissions unit shall not exceed 10% opacity as a 6-minute average; and
 - v. the maximum annual grain unloading rate at this emissions unit shall not exceed 1,265,000 tons per rolling, 12-month period.
 - f. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
 - g. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
 - h. In accordance with 40 CFR 60.302(d)(3), the permittee shall use the methods of emission control demonstrated to the Administrator's satisfaction to reduce emissions of particulate matter to the same level as, or less than, the requirements of 40 CFR 60.302(d)(1) and (d)(2). These equivalent methods have been determined to be the use of a self-unloading ship, discharging into a receiving hopper equipped with a dust collection system, utilizing a fabric filter and enclosed conveyors.
- c) Operational Restrictions
- (1) The permittee shall operate the fabric filter whenever this emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily records that document any time periods when the fabric filter was not in service when the emissions unit was in operation.



- (2) The permittee shall maintain monthly records of the following information:
 - a. the tons of grain received for each month; and
 - b. the rolling, 12-month summation of the tons of grain received.
- (3) 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 stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. the permittee shall operate the fabric filter whenever this emissions unit is in operation; and
- ii. the maximum annual grain unloading rate shall not exceed 1,265,000 tons per rolling, 12-month period;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

- (2) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
 - (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
 - (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- 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 Limitation:

PE from any stack serving this emissions unit shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

Visible fugitive PE from any egress point serving this emissions unit shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

PE from any stack serving this emissions unit shall not exceed 0.023 g/dscm(0.01 gr/dscf). PE from all stacks serving this emissions unit shall not exceed 1.10 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with these emissions limitations through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

PM10 emissions from all stacks serving this emissions unit shall not exceed 0.28 pound per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 201 and 202 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. Emission Limitation:

PE from this emissions unit shall not exceed 2.83 ton per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation represents the potential to emit for stack and fugitive emissions for this emissions unit at a throughput of 1,265,000 tons per rolling, 12-month period with an inherent dust collection efficiency of 98% capture and 99% control, utilizing an emission factor specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, of 0.15 pound of PE per ton of grain unloaded.

$$(1,265,000 \text{ tons/yr})(0.15 \text{ lb/ton})(1-(0.98)(0.99))(\text{ton}/2000\text{lbs}) = 2.83 \text{ tons/yr}$$

f. Emission Limitation:

PM10 emissions from this emissions unit shall not exceed 0.72 ton per rolling, 12-month period

This emission limitation reflects the potential to emit for stack and fugitive emissions from this emissions unit operating at a maximum throughput of 1,265,000 tons per rolling, 12-month period with an inherent dust collection efficiency of 98% capture and 99% control, utilizing an emission factor specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, of 0.038 pound of PM10 per ton of grain unloaded.

$$(1,265,000 \text{ tons/yr})(0.038 \text{ lb/ton})(1-(0.98)(0.99))(\text{ton}/2000\text{lbs}) = 0.72 \text{ ton/yr}$$

g) Miscellaneous Requirements

- (1) None.



3. P009, Grain screening & cleaning

Operations, Property and/or Equipment Description:

Grain screening and cleaning with fabric filter control

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. None.

(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. b)(1)a., b)(2)a., c)(1), d)(1), e)(1), and f)(1)b.

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(D)	Particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.12 tons per rolling, 12-month period. see b)(2)a. and c)(1)
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(1)	Stack particulate emissions (PE) shall not exceed 30 pounds per hour.

(2) Additional Terms and Conditions

a. The permittee shall control emissions from this emissions unit by venting emissions from this emissions unit to fabric filters.



c) Operational Restrictions

- (1) The permittee shall operate the fabric filters associated with the active portions of this emissions unit whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process was in operation.
- (2) 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 stack 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. 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the permittee shall operate the fabric filter whenever this emissions unit is in operation;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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 Limitation:

Visible emissions shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR part 60, Appendix A.

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

b. Emission Limitation:

PM10 emissions shall not exceed 0.12 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation was developed by multiplying the maximum grain receiving rate (1,265,000 tons/rolling, 12-month period – made enforceable by Section B.2.) by the uncontrolled emission factor specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03 (0.19 lb PM10/ton) multiplied by one minus the decimal fraction control efficiency provided by the permittee (1-0.999), and divided by 2,000 pounds per ton. The uncontrolled AP-42 emission factor was determined by dividing the controlled AP-42 emission factor (0.019 lb PM10/ton) by (1-0.90), assuming the controlled AP-42 emission factor is based on a 90% efficient cyclone.

If required, the permittee shall determine a site-specific emission factor in lb PM10/ton using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

Stack PE shall not exceed 30 pounds per hour.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum process weight rate (600 tons/hr) by the uncontrolled emission factor specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03 (0.75 lb PE/ton) multiplied by one minus the decimal fraction control efficiency provided by the permittee (1-0.999). The uncontrolled AP-42 emission factor was determined by dividing the controlled AP-42 emission factor (0.075 lb PE/ton) by (1-0.90), assuming the controlled AP-42 emission factor is based on a 90% efficient cyclone.



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If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- g) Miscellaneous Requirements
 - (1) None.



4. P013, Flour mill 'A'

Operations, Property and/or Equipment Description:

Wheat Flour Milling with Controls - 6 Fabric filters inherent to the process

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. None.

(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 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.
b.	OAC rule 3745-17-11(B)(1)	Stack particulate emissions (PE) shall not exceed 43 pounds per hour.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) 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 stack



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. 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.



- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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 Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:

Stack PE shall not exceed 43 pounds per hour.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by multiplying the maximum process weight rate of the emissions unit (41.7 tons/hr) by the uncontrolled particulate emission factor for wheat milling from AP-42 Table 9.9.1-2 dated 3/03 (70 lbs/ton), multiplied by one minus the process fabric filter decimal fraction efficiency (1-0.999). The fabric filter is inherent to the process.

$$(41.7 \text{ tons/hr})(70 \text{ lbs PE/ton})(1-0.999) = 2.92 \text{ lbs PE/hr}$$

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.



5. P014, Flour mill 'B'

Operations, Property and/or Equipment Description:

Wheat Flour Milling with Controls - 6 Fabric filters inherent to the process

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. None.

(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 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.
b.	OAC rule 3745-17-11(B)(1)	Stack particulate emissions (PE) shall not exceed 43 pounds per hour.

(2) **Additional Terms and Conditions**

a. None.

c) **Operational Restrictions**

(1) None.

d) **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 stack



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. 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.



- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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 Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

Stack PE shall not exceed 43 pounds per hour.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by multiplying the maximum process weight rate of the emissions unit (41.7 tons/hr) by the uncontrolled particulate emission factor for wheat milling from AP-42 Table 9.9.1-2 dated 3/03 (70 lbs/ton), multiplied by one minus the process fabric filter decimal fraction efficiency (1-0.999). The fabric filter is inherent to the process.

$$(41.7 \text{ tons/hr})(70 \text{ lbs PE/ton})(1-0.999) = 2.92 \text{ lbs PE/hr}$$

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.



6. P016, Grain handling

Operations, Property and/or Equipment Description:

Grain handling with fabric filter

- 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. None.
 - (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. b)(1)a., b)(2)a., c)(1), d)(1), e)(2), and f)(1)a.
- 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(D)	Particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 7.22 tons per rolling, 12-month period. see b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise provided by the rule.
c.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)(1)	Stack particulate emissions (PE) shall not exceed 50 pounds per hour.

(2) Additional Terms and Conditions

- a. The permittee shall control emissions from this emissions unit through a combination of enclosures and venting to fabric filters.
- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The permittee shall operate the fabric filters associated with the active portions of this emissions unit whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process was in operation.
- (2) 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 stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the permittee shall operate the fabric filter whenever this emissions unit is in operation;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and



- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- 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 Limitation:

PM10 emissions shall not exceed 7.22 tons per rolling, 12-month period.

Applicable Compliance Method:

The ton per rolling, 12-month period emission limitation was developed by multiplying the maximum grain receiving rate (1,265,000 tons/rolling, 12-month period) by the PM10 emission factor from U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, (0.034 lb/ton of grain handled), multiplied by 16, multiplied by one minus the product of the decimal fraction capture efficiency multiplied by the decimal fraction control efficiency (1-(0.98 x 0.999)), and then dividing by 2,000 pounds per ton.
 - b. Emission Limitation:

Visible emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - c. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to Method 9 of 40 CFR Part 60, Appendix A and the modifications specified in OAC rule 3745-17-03(B)(3).



d. Emission Limitation:

Stack PE shall not exceed 50 pounds per hour.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum process weight rate (2,100 tons/hr) by the PM10 emission factor from U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, (0.061 lb/ton of grain handled), multiplied by one minus the product of the decimal fraction capture efficiency multiplied by the decimal fraction control efficiency ($1 - (0.98 \times 0.999)$).

g) Miscellaneous Requirements

(1) None.



7. P900, Truck dump - Wheat

Operations, Property and/or Equipment Description:

Wheat truck dump with fabric filter

- 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. None.
 - (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. b)(1)a., b)(2)a., c)(1), d)(1), e)(2), and f)(1)a.
- 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(D)	Particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.78 ton per rolling, 12-month period. see b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise provided by the rule.
c.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)(1)	Stack particulate emissions (PE) shall not exceed 14 pounds per hour.

(2) Additional Terms and Conditions

- a. The permittee shall control emissions from this emissions unit through a combination of enclosures and venting to fabric filters.
- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The permittee shall operate the fabric filters associated with the active portions of this emissions unit whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process was in operation.
- (2) 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 stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the permittee shall operate the fabric filter whenever this emissions unit is in operation;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and



- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- 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 Limitation:**

PM10 emissions shall not exceed 0.78 ton per rolling, 12-month period.

Applicable Compliance Method:

The ton per rolling, 12-month period emission limitation was developed by multiplying the maximum grain receiving rate (1,265,000 tons/rolling, 12-month period) by the PM10 emission factor from U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, (0.059 lb/ton of grain unloaded), multiplied by one minus the product of the decimal fraction capture efficiency multiplied by the decimal fraction control efficiency (1-(0.98 x 0.999)), and then dividing by 2,000 pounds per ton.
 - b. **Emission Limitation:**

Visible emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - c. **Emission Limitation:**

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to Method 9 of 40 CFR Part 60, Appendix A and the modifications specified in OAC rule 3745-17-03(B)(3).



d. Emission Limitation:

Stack PE shall not exceed 14 pounds per hour.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum process weight rate (750 tons/hr) by the PM10 emission factor from U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, (0.059 lb/ton of grain unloaded), multiplied by one minus the product of the decimal fraction capture efficiency multiplied by the decimal fraction control efficiency (1-(0.98 x 0.999)).

g) Miscellaneous Requirements

(1) None.