

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

4/7/2014

Certified Mail

Mr. Maynard "William" Beam  
MWB, Family Limited Partnership  
P.O. Box 78  
Port William, OH 45164

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0514005006  
Permit Number: P0116476  
Permit Type: Initial Installation  
County: Clinton

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](http://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](http://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](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357 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: Ohio EPA-SWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
MWB, Family Limited Partnership**

Facility ID:	0514005006
Permit Number:	P0116476
Permit Type:	Initial Installation
Issued:	4/7/2014
Effective:	4/7/2014
Expiration:	4/7/2024





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
MWB, Family Limited Partnership

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. F001, F001 .....	11
2. F002, F002 .....	14
3. F003, F003 .....	18
4. F004, F004 .....	23
5. F005, F005 .....	26





**Final Permit-to-Install and Operate**  
MWB, Family Limited Partnership  
**Permit Number:** P0116476  
**Facility ID:** 0514005006  
**Effective Date:** 4/7/2014

## Authorization

Facility ID: 0514005006  
Application Number(s): A0050286  
Permit Number: P0116476  
Permit Description: Grain terminal.  
Permit Type: Initial Installation  
Permit Fee: \$5,000.00  
Issue Date: 4/7/2014  
Effective Date: 4/7/2014  
Expiration Date: 4/7/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MWB, Family Limited Partnership  
208 Main Street  
Port William, OH 45164

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

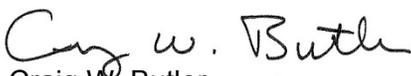
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402  
(937)285-6357

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  
Director



## Authorization (continued)

Permit Number: P0116476  
Permit Description: Grain terminal.

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	F001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	F002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	F003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F004</b>
Company Equipment ID:	F004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F005</b>
Company Equipment ID:	F005
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
MWB, Family Limited Partnership  
**Permit Number:** P0116476  
**Facility ID:** 0514005006  
**Effective Date:** 4/7/2014

## **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**  
MWB, Family Limited Partnership  
**Permit Number:** P0116476  
**Facility ID:** 0514005006  
**Effective Date:** 4/7/2014

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

MWB, Family Limited Partnership

**Permit Number:** P0116476

**Facility ID:** 0514005006

**Effective Date:** 4/7/2014

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
MWB, Family Limited Partnership  
**Permit Number:** P0116476  
**Facility ID:** 0514005006  
**Effective Date:** 4/7/2014

## **C. Emissions Unit Terms and Conditions**



**1. F001, F001**

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

Grain Receiving

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 3745-31-05(A)(3) as effective 11/30/01	Use of Hopper Trucks See b)(2)a
b.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/01/06	See b)(2)b
c.	OAC rule 3745-31-05(D) (in order to minimize potential emissions)	Particulate emissions shall not exceed 1.26 tons per rolling 12 month period. PM10 shall not exceed 0.28 tons per rolling 12 month period.
d.	OAC rule 3745-17-07(B)	exempt
e.	OAC rule 3745-17-08(B)	See b)(2)c

(2) Additional Terms and Conditions

a. 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 yet 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 will exist as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the uncontrolled potential to emit for PE emissions is less than 10 tons/year.

- c. The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The maximum annual grain throughput rate for this emissions unit shall not exceed 72,000 tons, as based upon a rolling 12-month average.
- (2) The emissions unit shall only receive grain from hopper trucks.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of (tons per month and total tons, to date for the calendar year) grain throughput for this emissions unit.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

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:

Fugitive PE shall not exceed 1.26 ton per year from grain receiving



Applicable Compliance Method:

The annual fugitive PE limitation was developed by multiplying the maximum annual grain throughput of 72,000 tons by an emission factor of 0.035 lb PE/ton grain from AP-42, Table 9.9.1-1 (revised 03/03) then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

Fugitive PM<sub>10</sub> shall not exceed 0.28 ton per year from grain receiving

Applicable Compliance Method:

The annual fugitive PM<sub>10</sub> limitation was developed by multiplying the maximum annual grain throughput of 72,000 tons by an emission factor of 0.0078 lb PE/ton grain from AP-42, Table 9.9.1-1 (revised 03/03) then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput, compliance with the annual emission limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.



**2. F002, F002**

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

Grain Handling, Transfer and Storage Operations

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 3745-31-05(A)(3) as effective 11/30/01	Use of enclosures See b)(2)a
b.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/01/06	See b)(2)b
c.	OAC rule 3745-31-05(D) (in order to minimize potential emissions)	Particulate emissions shall not exceed 0.56 tons per rolling 12 month period. PM10 shall not exceed 0.28 tons per rolling 12 month period.
d.	OAC rule 3745-17-07(B)	exempt
e.	OAC rule 3745-17-08(B)	See b)(2)c

(2) Additional Terms and Conditions

a. 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 yet 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 will exist as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the uncontrolled potential to emit for PE emissions is less than 10 tons/year.

- c. The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The maximum annual grain throughput rate for this emissions unit shall not exceed 72,000 tons, as based upon a rolling 12-month average.
- (2) The emissions unit shall be equipped with such equipment that will adequately enclose, contain, capture, vent and control the fugitive dust.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of (tons per month and total tons, to date for the calendar year) grain throughput for this emissions unit.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

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:

Fugitive PE shall not exceed 0.56 ton per year from grain handling and storage



The above emission limitation is based upon the following equation:

$$AER = [(GT \times EF1) + (GT \times EF2) + (DT \times EF1)](1 - Ce) / 2000$$

Where:

AER= annual emission rate in tons/year

GT= grain through put in tons/year (72,000 tons)

DT= grain conveyed to dryer (8,850 tons)

EF1= lbs/ton grain conveyed, (0.061)

EF2= lbs/ton grain stored, (0.025)

Ce= control efficiency, (enclosure 90%)

Applicable Compliance Method:

The annual fugitive PE limitation was developed by multiplying the maximum annual grain throughput of 72,000 tons by an emission factor of 0.061 lb PE/ton grain from AP-42, Table 9.9.1-1 (revised 03/03)(grain handling) and 0.025 lb PE/ton grain from AP-42, Table 9.9.1-1 for grain storage then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

Fugitive PM<sub>10</sub> shall not exceed 0.28 ton per year from grain handling and storage

The above emission limitation is based upon the following equation:

$$AER = [(GT \times EF1) + (GT \times EF2) + (DT \times EF1)](1 - Ce) / 2000$$

Where:

AER= annual emission rate in tons/year

GT= grain thru put in tons/year (72,000 tons)

DT= grain conveyed to dryer (8,850 tons)

EF1= lbs/ton grain conveyed, (0.034)

EF2= lbs/ton grain stored, (0.0063)

Ce= control efficiency, (enclosure 90%)



**Final Permit-to-Install and Operate**

MWB, Family Limited Partnership

**Permit Number:** P0116476

**Facility ID:** 0514005006

**Effective Date:** 4/7/2014

Applicable Compliance Method:

The annual fugitive PM<sub>10</sub> limitation was developed by multiplying the maximum annual grain throughput of 72,000 tons by an emission factor of 0.0078 lb PE/ton grain from AP-42, Table 9.9.1-1 (revised 03/03) then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput, compliance with the annual emission limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.



**3. F003, F003**

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

Grain Dryer

- 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 3745-31-05(A)(3)	<u>Grain Dryer Emissions</u> 0.99 tons fugitive particulate emissions (PE)/yr  <u>Natural Gas Combustion Emissions</u> 1.10 lbs nitrogen oxides (NOx)/hr; 5.15 tons of NOx/yr 0.99 lbs carbon monoxide (CO)/hr; 4.34 tons of CO/yr 0.09 lbs carbon monoxide (CO)/hr; 0.39 tons of CO/yr 0.06 lbs carbon monoxide (CO)/hr; 0.04 tons of CO/yr  See b)(2)a.
b.	OAC rule 3745-17-10	Particulate emissions shall not exceed 0.02 lb/MMBTU



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a six-minute average
d.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirements for this emissions unit have been determined to be:
  - i. the use of mineral oil; and
  - ii. the use of column plate perforation with a diameter equal to or less than 0.094 inches.

BAT requirements also include compliance with the terms and conditions of this permit.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 9,000 tons of grain.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of material throughput for this emissions unit, in tons per month and total tons, to date, for the calendar year.

e) Reporting Requirements

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



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:

0.99 tons fugitive PE/yr from the grain dryer

Applicable Compliance Method:

The annual emission limitation was established by multiplying an AP-42 emission factor of 0.22 lb PE/ton grain (Section 9.9.1 (3/2003)) by the maximum annual grain throughput of 9,000 tons, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the maximum annual grain throughput and the use of mineral oil, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitations:

1.10 lbsNO<sub>x</sub>/hr; 5.15 tons NO<sub>x</sub>/yr from combustion emissions

Applicable Compliance Method:

Compliance with the hourly NO<sub>x</sub> limitation was determined by multiplying a maximum heat input of 12 MMBtu/hr by a conversion factor of 1 ft<sup>3</sup>/1020 Btu and an AP-42 emission factor of 100 lbsNO<sub>x</sub>/mmft<sup>3</sup> of grain [Section 1.4 3/98)].

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7.

c. Emission Limitations:

0.99 lbs CO/hr; 4.34 tons CO/yr from combustion emissions

Applicable Compliance Method:

Compliance with the hourly CO limitation was determined by multiplying a maximum heat input of 12 MMBtu/hr by a conversion factor of 1 ft<sup>3</sup>/1020 Btu and an AP-42 emission factor of 84 lbs CO/mmft<sup>3</sup> of grain [Section 1.4 (3/98)].

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.



d. Emission Limitations:

0.09 lbs PM/hr; 0.39 tons PM/yr from combustion emissions

Applicable Compliance Method:

Compliance with the hourly PM limitation was determined by multiplying a maximum heat input of 12 MMBtu/hr by a conversion factor of 1 ft<sup>3</sup>/1020 Btu and an AP-42 emission factor of 7.6 lbs PM/mmft<sup>3</sup> of grain [Section 1.4 (3/98)].

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

e. Emission Limitations:

0.06 lbs VOC/hr; 0.28 tons VOC/yr from combustion emissions

Applicable Compliance Method:

Compliance with the hourly VOC limitation was determined by multiplying a maximum heat input of 12 MMBtu/hr by a conversion factor of 1 ft<sup>3</sup>/1020 Btu and an AP-42 emission factor of 5.5 lbs VOC/mmft<sup>3</sup> of grain [Section 1.4 (3/98)].

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

f. Emission Limitations:

0.01 lbs SO<sub>2</sub>/hr; 0.04 tons SO<sub>2</sub>/yr from combustion emissions

Applicable Compliance Method:

Compliance with the hourly SO<sub>2</sub> limitation was determined by multiplying a maximum heat input of 12 MMBtu/hr by a conversion factor of 1 ft<sup>3</sup>/1020 Btu and an AP-42 emission factor of 0.6 lbs SO<sub>2</sub>/mmft<sup>3</sup> of grain [Section 1.4 (3/98)].

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

g. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A.



**Final Permit-to-Install and Operate**

MWB, Family Limited Partnership

**Permit Number:** P0116476

**Facility ID:** 0514005006

**Effective Date:** 4/7/2014

g) Miscellaneous Requirements

(1) None.



**4. F004, F004**

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

Grain Load Out/Shipping

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 3745-31-05(A)(3) as effective 11/30/01	Use of a control system See b)(2)a
b.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/01/06	See b)(2)b
	OAC rule 3745-31-05(D) (in order to minimize potential emissions)	Particulate emissions shall not exceed 0.31 tons per rolling 12 month period. PM10 shall not exceed 0.1 tons per rolling 12 month period.
	OAC rule 3745-17-07(B)	exempt
	OAC rule 3745-17-08(B)	See b)(2)c

(2) Additional Terms and Conditions

a. 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 yet 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 will exist as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the uncontrolled potential to emit for PE emissions is less than 10 tons/year.

- c. The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08..

c) Operational Restrictions

- (1) The maximum annual grain throughput rate for this emissions unit shall not exceed 72,000 tons, as based upon a rolling 12month average.
- (2) The emissions unit shall be equipped with such equipment that will adequately enclose, contain, capture, vent and control the fugitive dust (e.g., socks or adjustable chute).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of (tons per month and total tons, to date for the calendar year) grain throughput for this emissions unit.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

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:

Fugitive PE shall not exceed 0.31 ton per year from grain shipping



Applicable Compliance Method:

The annual fugitive PE limitation was developed by multiplying the maximum annual grain throughput of 72,000 tons by an emission factor of 0.086 lb PE/ton grain from AP-42, Table 9.9.1-1 (revised 03/03) and by control efficiency of at least 90% then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

Fugitive PM<sub>10</sub> shall not exceed 0.10 ton per year from grain shipping

Applicable Compliance Method:

The annual fugitive PM<sub>10</sub> limitation was developed by multiplying the maximum annual grain throughput of 72,000 tons by an emission factor of 0.029 lb PE/ton grain from AP-42, Table 9.9.1-1 (revised 03/03) and by control efficiency of at least 90% then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput, compliance with the annual emission limitation shall also be demonstrated.

g) Miscellaneous Requirements

a. None.



**5. F005, F005**

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

Unpaved roadways and parking area

- 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 operations(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. 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)	7.4 tons/ year of fugitive particulate matter of 10 microns or less (PM10) 25.2 tons/year of fugitive particulate emissions (PE) no visible PE except for 3 minutes during any 60-minute period best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See b)(2)a. through b)(2)f.)
b.	OAC rule 3745-17-07(B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	(See b)(2)a. through b)(2)f.)

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all 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 treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking areas that are 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, 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.
- d. Any unpaved roadway or parking area that is subsequently paved, will require a General Permit for paved roadways and parking areas.
- 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 best available technology requirements of OAC rule 3745-31-05.

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>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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all roads and parking areas	daily
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- (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. 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;
- 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.

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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.



f) Testing Requirements

(1) Compliance with the emission limitations in Term b)(1) shall be determined in accordance with the following methods:

a. Emission Limitations:

7.4 tons/year of fugitive PM10

25.2 tons/year of fugitive PE

Applicable Compliance Method:

Compliance with fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used. These emission limits in the General Permit were based on a maximum of 120,000 vehicle miles traveled per year, and a 95% control efficiency for PE and PM10.

b. Emission Limitation:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 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").

g) Miscellaneous Requirements

(1) None.