

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

5/6/2014

Certified Mail

Ronald Digby  
Legacy Farmers Cooperative  
501 S COUNTYLINE ST  
Fostoria, OH 44830

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	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: 0332010178  
Permit Number: P0115506  
Permit Type: Administrative Modification  
County: Hancock

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, Northwest District Office at (419)352-8461 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-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Legacy Farmers Cooperative**

Facility ID:	0332010178
Permit Number:	P0115506
Permit Type:	Administrative Modification
Issued:	5/6/2014
Effective:	5/6/2014
Expiration:	4/28/2021





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Legacy Farmers Cooperative

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**Final Permit-to-Install and Operate**  
Legacy Farmers Cooperative  
**Permit Number:** P0115506  
**Facility ID:** 0332010178  
**Effective Date:** 5/6/2014

## Authorization

Facility ID: 0332010178  
Application Number(s): M0002398  
Permit Number: P0115506  
Permit Description: Administrative modification to establish the correct material throughputs for grain terminal operations and revision of associated emission limitations.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 5/6/2014  
Effective Date: 5/6/2014  
Expiration Date: 4/28/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Legacy Farmers Cooperative  
501 S COUNTYLINE ST  
Fostoria, OH 44830

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, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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



**Final Permit-to-Install and Operate**  
Legacy Farmers Cooperative  
**Permit Number:** P0115506  
**Facility ID:** 0332010178  
**Effective Date:** 5/6/2014

## Authorization (continued)

Permit Number: P0115506

Permit Description: Administrative modification to establish the correct material throughputs for grain terminal operations and revision of associated emission limitations.

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>P901</b>
Company Equipment ID:	F003
Superseded Permit Number:	P0107139
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>P902</b>
Company Equipment ID:	F005
Superseded Permit Number:	P0107139
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Legacy Farmers Cooperative  
**Permit Number:** P0115506  
**Facility ID:** 0332010178  
**Effective Date:** 5/6/2014

## **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**  
Legacy Farmers Cooperative  
**Permit Number:** P0115506  
**Facility ID:** 0332010178  
**Effective Date:** 5/6/2014

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



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

Legacy Farmers Cooperative

**Permit Number:** P0115506

**Facility ID:** 0332010178

**Effective Date:** 5/6/2014

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**  
Legacy Farmers Cooperative  
**Permit Number:** P0115506  
**Facility ID:** 0332010178  
**Effective Date:** 5/6/2014

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



**1. P901**

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

Truck Receiving, Railcar Unloading, Grain Transfer, Screening and Cleaning

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.

b)(1)c.

(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(F)	10.36 tons of particulate matter 10 microns in size or less (PM10)/year (stack)  33.45 tons of fugitive particulate emissions (PE)/year  11.57 tons of fugitive PM10/year  Visible fugitive PE from grain receiving to truck dump pits #1, #2, #3 and #4 shall not exceed 5% opacity as a six-minute average  Visible fugitive PE from railcar unloading and screening and cleaning shall not exceed 20% opacity as a six-minute average



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible fugitive PE from transferring and conveying shall not exceed 0% opacity as a six-minute average</p> <p>Visible stack PE from grain receiving, railcar unloading, transferring and conveying, and screening and cleaning shall not exceed 0% opacity as a six-minute average</p> <p>Emission limitations, opacity restrictions, operational restrictions, and control requirements [see b)(2)a., c)(1), and c)(2)]</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c.
d.	40 CFR Part 60 Subpart DD	See b)(2)e.
e.	OAC rule 3745-17-07(B)	See b)(2)f.
f.	OAC rule 3745-17-08(B)	See b)(2)f.
g.	OAC rule 3745-17-11(B)	See b)(2)g.
h.	OAC rule 3745-17-07(A)	See b)(2)g.

(2) Additional Terms and Conditions

- a. This permit establishes legally and practically enforceable emission limitations. The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(2) which require control equipment and/or control measures:
  - i. lb/ton emission limitation for PM10 for each individual baghouse stack\* as specified in b)(2)i.
  - ii. stack\* emission limitation of 10.36 tons of PM10/year from grain receiving to truck dump pits #1, 2, 3, & 4, railcar unloading, transferring/conveying, and screening and cleaning operations.
  - iii. fugitive emission limitation of 33.45 tons of PE/year from grain receiving to truck dump pits #1, 2, 3, & 4, railcar unloading, transferring/conveying, and screening and cleaning operations;
  - iv. fugitive emission limitation of 11.57 tons of PM10/year from grain receiving to truck dump pits #1, 2, 3, & 4, railcar unloading, transferring/conveying, and screening and cleaning operations;



- v. visible fugitive PE from grain receiving to truck dump pits #3 and #4 shall not exceed 5% opacity as a six-minute average;
- vi. visible fugitive PE from grain receiving to truck dump pits #1 and #2 shall not exceed 20% opacity as a six-minute average;
- vii. visible stack PE from grain receiving, railcar unloading, transferring and conveying, and screening and cleaning shall not exceed 0% opacity as a six-minute average.

\*All stack emissions of particulate matter are controlled by dust collectors and are considered PM10.

- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01, have been determined to be the use of baghouse control systems with design control efficiencies as specified in c)(2) .

The permittee has satisfied the 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 pollutants less than ten tons per year. However, that rule revision has not yet 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 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- 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.

BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM10 emissions from this air contaminant source since the controlled PTE is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that does not involve an established NAAQS.



- e. The provisions of 40 CFR Part 60 Subpart DD apply to the following operations (identified as affected facilities in 40 CFR 60.300) of this emissions unit based on construction/modification date of the affected facility:
  - i. truck grain receiving to truck dump pit #3;
  - ii. truck grain receiving to truck dump pit #4; and
  - iii. grain transferring/conveying operations.

The standards for particulate matter specified by this rule are outlined in b)(2)h.

- f. 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).
- g. The emission limitation specified by this rule is less stringent than the voluntary restrictions established under OAC rule 3745-31-05(F).
- h. Particulate matter from the stacks serving this emissions unit shall not exceed the following emission/opacity limits:

<b>Emissions Point</b>	<b>Control Equipment ID &amp; Model/Serial #</b>	<b>Emission Limit</b>	<b>Opacity Limit</b>	<b>Applicable Rule</b>
Dump Pit #1	Carter Day CFSI-72-RJ-72 Baghouse #1	0.0077 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)
Dump Pit #2 and Receiving Leg	Carter Day CFSI-72-RJ-72 Baghouse #2	0.0077 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)
Dump Pit #3 and Dump Pit #4	Donaldson- Torit 3190960A Baghouse #3	0.01 grain/dscf	0% opacity as a six-minute average	40 CFR Part 60 Subpart DD
		0.0077 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)
South “C” House Belt Line	Aero Dyne 24030.8 Baghouse #4	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)
North “C” House Belt Line	Carter Day 109 Baghouse #5	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)
South “D” House Belt Line	Carter Day 24-96 Baghouse #6	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)
North “D” House Belt Line	Carter Day 24-96 Baghouse #7	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)
South “E” House Belt Line	Carter Day 72-48 Baghouse #8	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31- 05(F)



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

Legacy Farmers Cooperative

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North "E" House Belt Line	Carter Day 72-48 Baghouse #9	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31-05(F)
Trolley Floor Belt Line	Aero Dyne 24030.8 Baghouse #10	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31-05(F)
New/Old Leg 108 Belt Line	Aero Dyne 24078.8 Baghouse #11	0.004 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31-05(F)
New/Old Leg Top End and Garner Bin	MAC 2192-78 Baghouse #12	0.01 grain/dscf	0% opacity as a six minute average	40 CFR Part 60 Subpart DD
		0.023 lb PM10/ton	0% opacity as a six-minute average	OAC rule 3745-31-05(F)

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit to represent the maximum potential throughput for each of the following individual elevator operations:

- a. The maximum throughput for truck receiving shall not exceed 696,000 tons of grain per year.
- b. The maximum throughput for railcar unloading shall not exceed 1,241 tons of grain per year.
- c. The maximum throughput for screening/cleaning shall not exceed 304,500 tons of grain per year.

(2) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements [see b)(2)a.]:

- a. truck receiving operations shall be controlled by a three-sided enclosure vented to a dust collector achieving 99% removal efficiency;
- b. transferring/conveying operations shall be totally enclosed and be vented to a dust collector achieving 99% removal efficiency; and
- c. screening/cleaning operations shall be controlled by a dust collector achieving a 95% removal efficiency;

d) Monitoring and/or Recordkeeping Requirements

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

- a. total combined throughput for truck grain receiving and railcar unloading; and
- b. throughput for screening/cleaning operations.



- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the following operations. The presence or absence of any visible fugitive 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. for the totally enclosed transferring/conveying operations:
    - i. the location and color of the emissions;
    - ii. the total duration of any visible emission incident; and
    - iii. any corrective actions taken to eliminate the visible emissions.
  - b. for the three-sided enclosure on truck grain dump pits #1, 2, 3, & 4, the enclosure around screening/cleaning operations, and the railcar unloading operations:
    - i. the location and color of the emissions;
    - ii. whether the emissions are representative of normal operations;
    - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - iv. the total duration of any visible emission incident; and
    - v. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (2)b.iv. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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) 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 stacks serving the dust collectors controlling truck dump pits #1, 2, 3, & 4, railcar unloading, transferring/conveying, and screening and cleaning. 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. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Northwest District Office by the due date specified in the Authorization section of this permit. The



PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

- (2) The reports may be submitted electronically through Ohio EPA's e-Business Center: Air Services online web portal; or they may be mailed as a hard copy to the Northwest District Office.
- (3) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(2) and d)(3):
  - a. for transferring/conveying operations:
    - i. all days during which any visible fugitive particulate emissions were observed from the totally enclosed transferring/conveying operations; and
    - ii. any corrective actions taken to eliminate the visible fugitive particulate emissions.
  - b. for the three-sided enclosure on truck grain dump pits #1, 2, 3, & 4, the enclosure around screening/cleaning operations, and the railcar unloading operations:
    - i. all days during which any visible fugitive particulate emissions were observed (identify the specific operation that experienced visible emissions) from the above operations as specified in d)(2); and
    - ii. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
  - c. for the dust collectors serving each stack:
    - i. all days during which any visible particulate emissions were observed from the stack serving the dust collector (identify the specific dust collector that experienced visible emissions); and
    - ii. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no days and/or corrective actions to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (4) Pursuant to the New Source Performance Standards (NSPS), the permittee is hereby advised of the requirements to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. actual start-up date (within 15 days after such date); and
  - c. date of performance testing (if required, at least 30 days prior to testing).



Reports are to be sent to:

Ohio EPA, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

f) Testing Requirements

(1) Compliance with the emission limitation in section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation  
10.36 tons of PM10/year (stack)

Applicable Compliance Method

The annual PM10 emission limitation was developed by summing the results of the following emission calculations:

**Receiving**

PE: multiply 0.18 lb of PE/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons and apply a control efficiency of 99%, then divide by 2000 lbs = 0.63 ton of PE\*/year

PM10: multiply 0.059 lb of PM10/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons and apply a control efficiency of 90%, then divide by 2000 lbs = 2.05 tons of PM10/year

**Transferring and Conveying**

PE: multiply 0.061 lb of PE/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons and apply a control efficiency of 99%, then divide by 2000 lbs, and multiply by 3 turnovers of the amount of grain received = 0.63 ton of PE\*/year

PM10: multiply 0.034 lb of PM10/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons and apply a control efficiency of 90%, then divide by 2000 lbs, and multiply by 3 turnovers of the amount of grain received = 3.55 tons of PM10/year

**Screening and Cleaning**

PE: multiply 0.004 lb of PE/ton (AP-42 Table 9.9.1-1 [3/03]\*\*) by a maximum annual throughput of 304,500 tons, then divide by 2000 lbs = 0.61 ton of PE\*/year

PM10: multiply 0.019 lb of PE/ton (AP-42 Table 9.9.1-1 [3/03]\*\*) by a maximum annual throughput of 304,500 tons, then divide by 2000 lbs = 2.89 tons of PM10/year

\* The calculated emissions of PE are assumed to be less than 10 microns in size (PM10) based the application of baghouse control with a high efficiency for suspended particulate matter.



\*\*It should be noted that the AP-42 emissions factors applied are representative of controlled levels of particulate matter and, as such, baghouse control efficiencies were not applied to the emission calculation.

- b. Emission Limitation  
33.45 tons of fugitive PE/year  
11.57 tons of fugitive PM10/year

Applicable Compliance Method

The annual PE and PM10 emission limitations were developed by summing the results of the following emission calculations:

***Fugitive PE***

Receiving: multiply 0.18 lb of PE/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons and a control efficiency of 75%, then divide by 2000 lbs = 15.66 tons of fugitive PE/year

Transferring and Conveying: multiply 0.061 lb of PE/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons, a control efficiency of 90%, then divide by 2000 lbs, and multiply by 3 turnovers of the amount of grain received = 6.37 tons of fugitive PE/year

Screening and Cleaning: multiply 0.075 lb of PE/ton\* (AP-42 Table 9.9.1-1[3/03]) by a maximum annual throughput of 304,500 tons, then divide by 2000 lbs = 11.42 tons of fugitive PE/year

\*Emissions not captured by the screening and cleaning baghouse control system were assumed to have the same level of emissions as grain cleaning/internal vibrating controlled by a cyclone as presented in AP-42 Table 9.9.1-1[3/03].

***Fugitive PM10***

Receiving: multiply 0.059 lb of PM10/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons and apply a control efficiency of 75%, then divide by 2000 lbs = 5.13 tons of fugitive PM10/year

Transferring and Conveying: multiply 0.034 lb of PM10/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 696,000 tons, and apply a control efficiency of 90%, then divide by 2000 lbs, and multiply by 3 turnovers of the amount of grain received = 3.55 tons of fugitive PM10/year

Screening and Cleaning: multiply 0.019 lb of PM10/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 304,500 tons, then divide by 2000 lbs = 2.89 tons of fugitive PM10/year

- c. Emission Limitations  
Visible fugitive PE shall not exceed the following limits:

5% opacity as a six-minute average from grain receiving to truck dump pits #1-4  
20% opacity as a six-minute average from railcar unloading & screening/cleaning  
0% opacity as a six-minute average from transferring/conveying operations



Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation

Visible stack PE from grain receiving, railcar unloading, transferring and conveying, and screening and cleaning shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation

0.01 grain of PM/dscf

Applicable Compliance Method

Compliance with the maximum outlet concentration limitation shall be determined based on the results of emission testing conducted in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

NSPS testing was performed on truck dump pits #3 and #4, as well as their associated transferring and conveying operations, on October 18, 2011 in accordance with the requirements of PTIO P0107139. Therefore, no further emission testing is required as a result of this permit action.

f. Emission Limitations

lb of PM10/ton limitations for stack emissions as identified in the following table:

<b>Emissions Point</b>	<b>Control Equipment ID &amp; Model/Serial #</b>	<b>Emission Limitation</b>
Dump Pit #1	Carter Day CFSI-72-RJ-72 Baghouse #1	0.0077 lb PM10/ton
Dump Pit #2 and Receiving Leg	Carter Day CFSI-72-RJ-72 Baghouse #2	0.0077 lb PM10/ton
Dump Pit #3 and Dump Pit #4	Donaldson-Torit 3190960A Baghouse #3	0.0077 lb PM10/ton
South "C" House Belt Line	Aero Dyne 24030.8 Baghouse #4	0.004 lb PM10/ton
North "C" House Belt Line	Carter Day 109 Baghouse #5	0.004 lb PM10/ton
South "D" House Belt Line	Carter Day 24-96 Baghouse #6	0.004 lb PM10/ton



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

Legacy Farmers Cooperative

**Permit Number:** P0115506

**Facility ID:** 0332010178

**Effective Date:** 5/6/2014

North "D" House Belt Line	Carter Day 24-96 Baghouse #7	0.004 lb PM10/ton
South "E" House Belt Line	Carter Day 72-48 Baghouse #8	0.004 lb PM10/ton
North "E" House Belt Line	Carter Day 72-48 Baghouse #9	0.004 lb PM10/ton
Trolley Floor Belt Line	Aero Dyne 24030.8 Baghouse #10	0.004 lb PM10/ton
New/Old Leg 108 Belt Line	Aero Dyne 24078.8 Baghouse #11	0.004 lb PM10/ton
New/Old Leg Top End and Garner Bin	MAC 2192-78 Baghouse #12	0.023 lb PM10/ton

Applicable Compliance Method

If required, compliance shall be determined in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202, of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

g) Miscellaneous Requirements

- (1) The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.



**2. P902**

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

Railcar/Truck Loading

- 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.
    - b)(2)c.
  - (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(F)	3.33 tons of fugitive particulate emissions (PE)/year  1.12 tons of fugitive particulate matter less than 10 microns in size (PM10)/year  Emission limitations, opacity restrictions, operational restrictions, and control measures [see b)(2)a, c)(1), and c)(2)]
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-07(B)	See b)(2)f.
e.	OAC rule 3745-17-08(B)	See b)(2)f.



(2) Additional Terms and Conditions

- a. This permit establishes legally and practically enforceable emission limitations. The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(2) which require control measures:
  - i. fugitive emission limitation of 3.33 tons of PE/year;
  - ii. fugitive emission limitation of 1.12 tons of PM10/year; and
  - iii. visible fugitive particulate emission limitation of 20% opacity as a three-minute average when performing truck or railcar loading operations.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be a work practice standard requiring the use of an adjustable spout as specified in c)(2).

The permittee has satisfied the 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 pollutants less than ten tons per year. However, that rule revision has not yet 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 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- 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.

BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM10 emissions from this air contaminant source since the controlled PTE is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that does not involve an established NAAQS.



- e. The requirements specified by this rule are equivalent to or less stringent than the voluntary restrictions established under OAC rule 3745-31-05(F).
- f. 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 following operational restrictions have been included in this permit to represent the maximum potential throughput for railcar/truck loading operations:
  - a. the maximum throughput for this emissions unit shall not exceed 309,795 tons of grain per year.
- (2) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements [see b)(2)a.]:
  - a. railcar/truck loading operations shall employ an adjustable loading spout.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the amount of material throughput for railcar/truck loading, in tons per month and total tons, to date, for the calendar year.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit. The presence or absence of any visible fugitive 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 emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Northwest District Office by the due date specified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (2) The reports may be submitted electronically through Ohio EPA's e-Business Center: Air Services online web portal; or they may be mailed as a hard copy to the Northwest District Office.
- (3) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(2):
  - a. all days during which any visible fugitive particulate emissions were observed; and
  - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no days and/or corrective actions to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

- (1) Compliance with the emission limitation in section b)(1) of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation  
3.33 tons of fugitive PE/year  
1.12 tons of fugitive PM10/year

Applicable Compliance Method

PE: Compliance shall be demonstrated by multiplying an emission factor of 0.086 lb of PE/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 309,795 tons and applying a control efficiency of 75%, then dividing by 2000 lbs

PM10: Compliance shall be demonstrated by multiplying an emission factor of 0.029 lb of PM10/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum annual throughput of 309,795 tons and applying a control efficiency of 75%, then dividing by 2000 lbs.

\*Annual emissions were based on the worst-case scenario as represented by all throughput being loaded by truck



b. Emission Limitation

Visible fugitive PE shall not exceed the following opacity limits:

20% opacity as a three-minute average from railcar loading operations

20% opacity as a three-minute average from truck loading operations

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

- (1) The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.