



5/22/2014

Certified Mail

Mr. Joe Payne
 Cargill, Incorporated - Salt Division (Akron, OH)
 2065 Manchester Road
 Akron, OH 44314-1770

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 1677010027
 Permit Number: P0115784
 Permit Type: Initial Installation
 County: Summit

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
Yes	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 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: U.S. EPA
ARAQMD; Pennsylvania; West Virginia; Canada



Response to Comments

Facility ID:	1677010027
Facility Name:	Cargill, Incorporated - Salt Division (Akron, OH)
Facility Description:	Salt Production
Facility Address:	2065 Manchester Road Akron, OH 44314-1770 Summit County
Permit:	P0115784, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Akron Beacon Journal on 03/05/2014. The comment period ended on 04/04/2014.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

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

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

1. Topic: Net Emissions Increase

- a. Comment: The permit does not give an analysis of the contemporaneous period as described in the definition for major modification in the Non-attainment New Source Review (NNSR) and Prevention of Significant Deterioration (PSD) regulations. All increases and decreases of emissions should be considered in determining whether a project will be a major modification. As the permit is currently written, the decreases seem to be considered in step 1 of the assessment, which constitutes project netting, which is not allowed. The permit must have a clear discussion of the actual emission increases and decreases from the affected units during the contemporaneous period to support Ohio Environmental Protection Agency's conclusion.

Response: The permit analysis under section B.2. has been updated with a more detailed description of all actual emission increases and decreases from the affected units during the contemporaneous period to demonstrate this project will not be a major modification.

- b. Comment: The permit strategy write-up uses different contemporaneous periods for nitrogen oxides (NOx) and carbon dioxide equivalent (CO₂e), 2010 - 2011 and 2006 - 2007, respectively. The 5-year contemporaneous periods must be the same for all pollutants as described in 40 C.F.R.52.21 and OAC 3745-31-01. The consecutive 24-month periods used may differ between pollutants. Additionally, the 24-month period used for CO₂e is outside of the 5-year period immediately preceding construction of the project. An appropriate 24-month period must be



used in the PSD analysis.

Response: The permit uses the same contemporaneous period of April 2009 to January 2015 for both NO_x and CO₂e. Pursuant to §52.21(b)(3)(ii), "An increase or decrease in actual emissions is contemporaneous with the increase from the particular change only if it occurs between: (a) The date five years before construction on the particular change commences; and (b) The date that the increase from the particular change occurs." Cargill's contemporaneous period begins five years prior to the start of the construction period, which was scheduled for April 2014, and ends when the project will begin normal operation, which is planned for January 2015. The actual shutdown of the existing boilers must occur within this contemporaneous period in order for the decreases to be considered creditable. In this case, the boiler shutdowns will occur just before the official startup of the new gas-fired boiler. Under the PSD regulations, the definition of net emissions increase requires baseline actual emissions for calculating increases and decreases that are contemporaneous with the particular change and are otherwise creditable. Pursuant to §52.21(b)(48)(ii), "...baseline actual emissions means the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 10-year period immediately preceding either the date the owner or operator begins actual construction of the project, or the date a complete permit application is received by the Administrator..." The consecutive 24-month period of January 2006 through December 2007 is appropriate to be used for CO₂e in the PSD analysis since it falls within the 10-year period immediately preceding November 13, 2013, the date upon which a complete permit application was received. Additionally, as stated in the comment, the consecutive 24-month periods used in the PSD analysis may differ between pollutants. January 2010 through December 2011 was selected for NO_x.

- c. Comment: Appendix A of the permit application includes calculations used to determine Baseline Actual Emissions (BAE) for the PSD analysis. The calculated values determined are for potential emissions from B001 - B004 and B006. In the PSD regulations, §52.21(b)(48)(i) and OAC 3745-31-01(0), BAE is defined for existing electric steam generating units. The use of potential emissions in place of BAE is not acceptable for the netting analysis. The NNSR and PSD analyses must be consistent with the regulations.

Response: Appendix A of the permit application includes potential to emit calculations; however, the potential emissions were not used in place of BAE for the netting analysis. Appendix B of the permit application contains a description of the BAE calculations used in the netting analysis which is consistent with the PSD regulations. The calculated BAE values were determined based on actual fuel usage for B001-B004 and B006 as documented in Cargill's annual fee emission reports during the consecutive 24-month periods selected for each pollutant. The draft-issued CO₂e BAE calculations have since been updated with the revised 40 CFR 98 emission factors published on November 29, 2013 (after the date the application was received). Also note, emissions units B001-B004 and B006 are not existing electric utility steam generating units as defined under §52.21(b)(31), because they don't supply electrical output to any utility power distribution system for sale. Therefore, BAE was determined as provided under §52.21(b)(48)(ii), for existing emissions units other than an electric utility steam generating unit.

2. Topic: Typographical Errors

- a. Comment: Section B.3., The website for e-CFR is incorrect. It should be www.ecfr.gov.

Response: Website has been corrected to www.ecfr.gov.



- b. Comment: Section C.1.b)(1)g., NO_x rule citation should be 3745, not 3754.

Response: Rule citation has been changed to 3745.

- c. Comment: Section C.1.f)(1)a., A boiler doesn't have a "maximum production rate."

Response: Term has been revised to "The emission testing shall be conducted within 180 days after initial startup of the emissions unit."

- d. Comment: Section C.1.f)(2)c., The applicable compliance method for NO_x incorrectly references section d)(4) as the requirement for use of a continuous emission monitor and it is mentioned in section d)(3).

Response: Reference has been corrected to d)(3).

- e. Comment: Citations to OAC rule 3745-77-07 throughout the permit are not appropriate since this is not a Title V permit.

Response: Rule citations have been deleted.



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Cargill, Incorporated - Salt Division (Akron, OH)

Facility ID:	1677010027
Permit Number:	P0115784
Permit Type:	Initial Installation
Issued:	5/22/2014
Effective:	5/22/2014



Division of Air Pollution Control
Permit-to-Install
for
Cargill, Incorporated - Salt Division (Akron, OH)

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Authorization

Facility ID: 1677010027
Facility Description:
Application Number(s): A0048490
Permit Number: P0115784
Permit Description: Title V PTI for the installation of a new 180.97 MMBtu/hr natural gas-fired boiler (B008) to replace four existing coal-fired boilers (B001-B004) and one existing natural gas-fired boiler (B006). Emissions offsets were used to avoid major NANSR/PSD.
Permit Type: Initial Installation
Permit Fee: \$500.00
Issue Date: 5/22/2014
Effective Date: 5/22/2014

This document constitutes issuance to:

Cargill, Incorporated - Salt Division (Akron, OH)
2065 Manchester Road
Akron, OH 44314-1770

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

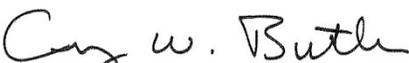
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install
Cargill, Incorporated - Salt Division (Akron, OH)
Permit Number: P0115784
Facility ID: 1677010027
Effective Date: 5/22/2014

Authorization (continued)

Permit Number: P0115784
Permit Description: Title V PTI for the installation of a new 180.97 MMBtu/hr natural gas-fired boiler (B008) to replace four existing coal-fired boilers (B001-B004) and one existing natural gas-fired boiler (B006). Emissions offsets were used to avoid major NANSR/PSD.

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

Emissions Unit ID:	B008
Company Equipment ID:	Natural Gas Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Cargill, Incorporated - Salt Division (Akron, OH)
Permit Number: P0115784
Facility ID: 1677010027
Effective Date: 5/22/2014

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Akron Regional Air Quality Management District.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Akron Regional Air Quality Management District. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Akron Regional Air Quality Management District every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Akron Regional Air Quality Management District in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Akron Regional Air Quality Management District.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Regional Air Quality Management District. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
Cargill, Incorporated - Salt Division (Akron, OH)
Permit Number: P0115784
Facility ID: 1677010027
Effective Date: 5/22/2014

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Permit to install (PTI) P0115784 shall cover the installation of one natural gas-fired boiler rated at a maximum heat input capacity of 180.97 MMBtu/hr. The new boiler (B008) will replace the steam generating requirements of four existing coal-fired boilers (B001-B004) and one existing natural gas-fired boiler (B006) that currently provide steam to the plant. The permittee shall permanently shut down all five existing boilers (B001-B004, and B006) once the new boiler (B008) is available for operation and determined to be reliable, within a 180-day shake-down period.

These shutdowns are required for the purpose of netting out of Non-Attainment New Source Review (NANSR), Prevention of Significant Deterioration (PSD), and corresponding Ohio Administrative Code (OAC) provisions for nitrogen oxides NO_x and greenhouse gases (GHGs) represented as carbon dioxide equivalents (CO₂e), which are the only regulated NSR pollutants from the installation of the new boiler (B008) with a potential to emit (PTE) above the significant emission rates (SER) associated with a major modification, as shown in Table 1.

Table 1 – Annual Emissions

Description	Annual Emissions (tpy)								
	NO _x	CO	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	Pb	CO ₂ e
B008 PTE	79.3	65.3	5.9	5.9	5.9	0.5	4.3	0.0004	92,818
Major NSR SER	40	100	25	15	10	40	40	0.6	75,000

As a result, a contemporaneous netting analysis for NO_x and CO₂e was conducted to determine the net emissions increase from the proposed boiler replacement project. The contemporaneous time period for the project extends approximately from April 2009 to January 2015. The period begins five years prior to the start of the construction period, which is scheduled for April 2014. The end of the contemporaneous period is when the new boiler (B008) will begin normal operation, which is planned for January 2015. During the contemporaneous period, the only creditable changes at Cargill's Akron Plant resulting in emissions increases or decreases will be the shutdowns of the four existing coal-fired boilers (B001-B004) and the one existing natural gas-fired boiler (B006). The consecutive 24-month periods selected by the facility to calculate the baseline actual emissions are January 2010 through December 2011 for NO_x, and January 2006 through December 2007 for CO₂e. The net emissions increase (i.e., the sum of the proposed project emissions increase and all contemporaneous and creditable emission increases and decreases) for each pollutant is summarized in Table 2.

Table 2 – Net Emissions Increase

Regulated NSR Pollutant	NO _x	CO ₂ e
Potential Emissions from New Boiler Installation (tpy)	79.3	92,818
Contemporaneous & Creditable Emission Increases (tpy)	0	0
Contemporaneous & Creditable Emission Decreases (tpy)	-139.4	-101,486



Net Emissions Increase (tpy)	-60.1	-8,668
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Since the net emissions increases of NO_x and CO₂e are less than the respective major NSR SERs, the proposed boiler replacement project is not considered a major modification or subject to NANSR/PSD permitting regulations. In order to ensure that emissions from the new boiler do not exceed the annual emission rates identified in Table 1, the permittee must comply with the source design characteristics specified in the emissions unit's terms and conditions under Section C of this permit.

3. The following emissions units contained in this permit are subject to the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, SubpartDb: B008. The complete NSPS requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Akron Regional Air Quality Management District (ARAQMD).



Final Permit-to-Install
Cargill, Incorporated - Salt Division (Akron, OH)
Permit Number: P0115784
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C. Emissions Unit Terms and Conditions



1. B008, Natural Gas Boiler

Operations, Property and/or Equipment Description:

180.97 MMBtu/hr natural gas-fired boiler with a heat release rate of 93.3 MMBtu/hr-ft³

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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.	ORC 3704.03(T)	<p>The permittee shall install a boiler that is designed to achieve 0.10 pound (lb) of nitrogen oxide (NO_x) per million British thermal units (MMBtu) of heat input using low NO_x burners and flue gas recirculation.</p> <p>The permittee shall install a boiler that is designed to achieve 84 pounds (lbs) of carbon monoxide (CO) per million standard cubic feet (MMscf) of natural gas fired.</p> <p>See b)(2)a., c)(1) and c)(2)</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	<p>The permittee shall install a boiler that is designed to achieve the following:</p> <p>7.6 lbs of particulate emissions (PE) per MMscf of natural gas fired;</p> <p>5.5 lbs of volatile organic compounds (VOC) per MMscf of natural gas fired; and</p> <p>0.6 lb of sulfur dioxide (SO₂) per MMscf of natural gas fired.</p> <p>See b)(2)a., b)(2)b., c)(1) and c)(2)</p>
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c. and c)(1)
d.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/MMBtu of actual heat input See b)(2)c.
f.	OAC rule 3745-18-06(A)	Exempt. See b)(2)d.
g.	OAC rule 3745-110-03(C)	0.10 lb NO _x /MMBtu
h.	40 CFR Part 60, Subpart Db (40 CFR 60.40b – 60.49b)	0.20 lb NO _x /MMBtu [40 CFR 60.44b(a)(1)(ii)] The emission limitation specified by this standard is less stringent than the limitation established pursuant to OAC rule 3745-110-03(C). See b)(2)e.
i.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19)	General Provisions

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) are based on the source’s design characteristics.
- b. The permittee has satisfied the BAT requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then the emission limitations/control measures for PE, VOC, and SO₂ no longer apply.
- c. The following 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:
 - i. the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, VOC, and SO₂ emissions from this air contaminant source since the potential to emit for PE, VOC, and SO₂, individually, is less than 10 tons per year; and



- ii. the requirements of OAC rule 3745-17-10(B)(1) become effective.
- d. Fuel burning equipment is exempt from paragraphs (D), (F) and (G) of this rule and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
- e. In accordance with 40 CFR 60.40b(a), emissions unit B008 is a steam generating unit constructed after June 19, 1984, with a heat input capacity greater than 100 MMBtu/hr, and is subject to the emissions limitations/control measures specified in this section.
 - i. Pursuant to 40 CFR 60.42b(k)(2), units firing only gaseous fuel are exempt from the sulfur dioxide (SO₂) emissions limit in §60.42b(k)(1).
 - ii. Emissions unit B008 is not subject to the particulate matter (PM) emission limits or opacity limits established under 40 CFR 60.43b since coal, oil, wood, or mixtures of these fuels with any other fuels are not combusted in this unit.
 - iii. The permittee shall comply with the applicable standards for nitrogen oxides (NO_x) required under 40 CFR Part 60, Subpart Db, including the following sections:

60.44b(a)	Standards for NO _x
60.44b(h) and 60.46b(a)	NO _x standards apply at all times, including periods of startup, shutdown, or malfunction
60.44b(i)	Compliance with NO _x emission limits is determined on a 30-day rolling average basis

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.
- (2) The permittee shall operate and maintain this emissions unit following the manufacturer's recommendations in order to ensure the source continues to operate as designed.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel.
- (2) The permittee shall keep records of any maintenance activities performed on this emissions unit along with the manufacturer's recommendations.
- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart Db, including the following sections:



60.48b(b)(1) and (c) through (f)	Continuous emissions monitoring system (CEMS)
60.48b(g)(2)	Monitoring alternative to CEMS
60.49b(d)(1)	Records of amount of fuel combusted each day and the annual capacity factor calculation
60.49b(g)	Records for units subject to NO _x standards
60.49b(o)	Record retention period

e) Reporting Requirements

- (1) The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - Standard Terms and Conditions, Section A of this permit.
- (2) The permittee shall submit semiannual written reports that identify any days during which a fuel other than natural gas was burned in this emissions unit, including the type and quantity of fuel. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or Local Air Agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart Db, including the following sections:

60.49b(a)	Initial startup notification
60.49b(b)	Performance test data
60.49b(c)	Plan for monitoring provisions of §60.48b(g)(2)
60.49b(h)	Excess emission reports
60.49b(i)	Reports of information recorded under §60.49b(g)

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable NSPS Subpart Db mass emission rate of 0.20 lb NO_x/MMBtu, in the appropriate averaging period.



- c. A 30-day performance test using the continuous system for monitoring NO_x shall be employed to demonstrate compliance with the allowable mass emission rate in accordance with 40 CFR 60.46b(e).
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or Local Air Agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or Local Air Agency.
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



Applicable Compliance Method:

If required, compliance with the opacity limitation identified above shall be determined by visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Methods:

Compliance with the allowable particulate emission limitation identified above shall be demonstrated by dividing the emission factor for natural gas combustion of 7.6 lb PE/10⁶scf(AP-42, Table 1.4-2, dated 7/98) by 1,020 to convert to lb/MMBtu.

If required, compliance with the lb PE/MMBtu emission limitation above shall be determined through stack testing performed in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

0.10 lb NO_x/MMBtu [OAC rule 3745-110-03(C)]

Applicable Compliance Method:

Compliance with the allowable NO_x emission limitation identified above shall be determined by a 24-hour daily heat input-weighted average calculated from the data measured and recorded by the continuous emissions monitor required in section d)(3). A 30-day rolling heat input-weighted average emission rate may be used to demonstrate compliance with the emission limit from October 1st to April 30th.

The permittee shall determine the 24-hourly heat input-weighted average NO_x emission rate based on the heat input-weighted average of the block hourly arithmetic average emission rates during each 24-hour daily period from 12 a.m. to 12 a.m. the following day using continuous emissions monitor data. The block hourly heat input-weighted average emission rate must be calculated for each one-hour period starting with the period 12 a.m. to 1 a.m. and continuing through until the last period 11 p.m. to 12 a.m.; or, starting with the period 12 p.m. to 1 p.m. and continuing through the last period 11 a.m. to 12 p.m. The 30-day rolling heat input-weighted average must be the average of the 24-hour daily heat input-weighted NO_x emission rate.

g) Miscellaneous Requirements

- (1) None.