



7/28/2014

Genevieve Damico *Via E-Mail Notification*  
United States Environmental Protection Agency  
Mail Code: AR-18J  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT  
Facility Name: ADM-Fostoria  
Facility ID: 0332020187  
Permit Type: Minor Permit Modification  
Permit Number: P0116868

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically 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 U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office





**PROPOSED**

**Division of Air Pollution Control  
Title V Permit  
for  
ADM-Fostoria**

Facility ID:	0332020187
Permit Number:	P0116868
Permit Type:	Minor Permit Modification
Issued:	7/28/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
ADM-Fostoria

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**Proposed Title V Permit**  
ADM-Fostoria  
**Permit Number:** P0116868  
**Facility ID:** 0332020187

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0332020187  
Facility Description: Soybean Oil Mill  
Application Number(s): A0050854  
Permit Number: P0116868  
Permit Description: Minor Title V permit modification to incorporate the terms and conditions of PTI P0116683 issued 4/21/14 for emissions units P901 and P902.  
Permit Type: Minor Permit Modification  
Issue Date: 7/28/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0087133

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

ADM-Fostoria  
608 Findlay Road  
Fostoria, OH 44830

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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Proposed Title V Permit**  
ADM-Fostoria  
**Permit Number:** P0116868  
**Facility ID:** 0332020187  
**Effective Date:** To be entered upon final issuance

## **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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## **2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- 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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*



c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*



#### **4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

#### **5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

#### **6. Severability Clause**

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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

#### **7. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



## **10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## **11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - (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 Ohio EPA DAPC, Northwest District Office 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
  - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

#### **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



**Proposed Title V Permit**

ADM-Fostoria

**Permit Number:** P0116868

**Facility ID:** 0332020187

**Effective Date:** To be entered upon final issuance

### **30. Submitting Documents Required by this Permit**

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 Ohio EPA DAPC, Northwest District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Proposed Title V Permit**

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## **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. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.
  - a) F006 - Pellet Load-out Tanks (PTI 03-13053)
  - b) L001 - Cold Cleaner Parts Washer
  
3. The following emissions unit(s) contained in this permit are subject to 40 CFR, Part 63, Subpart GGGG. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
  - a) P013 - Oil extraction



**Proposed Title V Permit**

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



1. B004, #2 Boiler

Operations, Property and/or Equipment Description:

Boiler 2 - 69 mmBtu/hr - natural gas / number 2 fuel oil / number 6 fuel oil / vegetable oil 'biofuel'

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a) (PTI P0105829 issued February 9, 2010)	0.37 lb nitrogen oxides (NO <sub>x</sub> ) /mmBtu of actual heat input  0.084 lb carbon monoxide (CO) /mmBtu of actual heat input  0.11 lb particulate emissions (PE) /mmBtu of actual heat input (when firing No. 6 fuel oil or biofuel)  0.10 lb particulate matter (filterable) 10 microns or less (PM <sub>10</sub> ) /mmBtu of actual heat input (when firing No. 6 fuel oil or biofuel)  0.0079 lb PM <sub>10</sub> (filterable) /mmBtu of actual heat input (when firing No. 2 fuel oil or natural gas)  See b)(2)b and b)(2)c.
b.	OAC rule 3745-31-05(D)	39.0 tons NO <sub>x</sub> per rolling, 12-month period [See b)(2)a.]  39.0 tons SO <sub>2</sub> per rolling, 12-month period [See b)(2)a.]  24.9 tons of PE per rolling 12-month period [See b)(2)a]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		9.9 tons of PM <sub>10</sub> per rolling 12-month period [See b)(2)a]
c.	OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE) /mmBtu of actual heat input (when firing natural gas and/or No. 2 fuel oil) [See b)(2)c.]
d.	OAC rule 3745-17-10 (C)(2)	See b)(2)d.
e.	OAC rule 3745-18-06(D)	1.6 lb sulfur dioxide (SO <sub>2</sub> ) /mmBtu of actual heat input
f.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
g.	OAC rule 3745-21-08(B)	See b)(2)e.
h.	40 CFR 63.52(a)(2)	See b)(2)f.

(2) Additional Terms and Conditions

- a. This permit establishes the federally enforceable emission limitations in b)(1)b for purposes of establishing the emissions unit as a minor modification for attainment New Source Review. The emission limitations are based on fuel usage restrictions [see c)(3)] for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability.
- b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-18-06(D), and 3745-31-05(D).
- c. The emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a) defers to the emissions limitation specified by OAC 3745-17-10 (B)(1).
- d. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).
- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.



- f. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas, fuel oil number 2, fuel oil number 6, or biofuel in this emissions unit.  
[OAC 3745-77-07(A)(1) and PTI P0105829]
- (2) The fuel oil number 2 combusted in this emissions unit shall only be fuel oil number 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils".  
[OAC 3745-77-07(A)(1) and PTI P0105829]
- (3) The fuel oil number 6 combusted in this emissions unit shall only be fuel oil number 6, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils" and shall meet the following requirements: the fuel oil number 6 shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission standard specified in OAC 3745-18-06(D).  
[OAC 3745-77-07(A)(1) and PTI P0105829]
- (4) The maximum rolling, 12-month quantity of fuel burned in this emissions unit shall be limited by the following equation. The criteria of the limiting equation must be met for NO<sub>x</sub>, SO<sub>2</sub>, PE, and PM<sub>10</sub> (meaning the calculated results for NO<sub>x</sub>, SO<sub>2</sub>, PE, and PM<sub>10</sub> must not exceed 39.0, 39.0, 24.9, and 9.9 tons, respectively).

$$\sum_{M=1}^{12} \sum_n [(U_n)(C_n) (1 \text{ ton} / 2000 \text{ lbs})] \leq \text{EMT}$$

where:

M = the increment of the rolling 12-month period;  
n = the increment of the fuel usage input during the period;

U<sub>n</sub> = total fuel usage, cubic feet of natural gas, gallons or mmBtu heat input of oil, for each individual fuel type in the units of the factor applied, for: natural gas, fuel oil number 2, fuel oil number 6, biofuel

C<sub>n</sub> = emission factor for the individual fuel:

- 0.20 lb NO<sub>x</sub> /mmBtu (biofuel)
- 0.10 lb NO<sub>x</sub> /mmcf of natural gas



0.15 lb NO<sub>x</sub> /mmBtu (fuel oil number 2)  
0.37 lb NO<sub>x</sub> /mmBtu (fuel oil number 6)

0.0015 lb SO<sub>2</sub> /mmBtu (biofuel)  
0.6 lb SO<sub>2</sub> /mmcf of natural gas  
142(S\*) lbs SO<sub>2</sub> /1000 gallons of fuel oil number 2  
157(S\*) lbs SO<sub>2</sub> /1000 gallons of fuel oil number 6

1.9 lbs PE/mmcf of natural gas  
16.5\*\* lbs PE/1000 gallons of fuel oil number 6  
2 lbs PE/1000 gallons of fuel oil number 2  
0.07 lbs PE/mmBtu (biofuel)

1.9 lbs PM<sub>10</sub> (filterable) /mmcf of natural gas  
14.3\*\*\* lbs PM<sub>10</sub> (filterable) /1000 gallons of fuel oil number 6  
1.1 lbs PM<sub>10</sub> (filterable) /1000 gallons of fuel oil number 2  
0.07 lbs PM<sub>10</sub> (filterable) /mmBtu (biofuel)\*\*\*\*

\* S = sulfur content, weight percent

\*\* This emissions factor will be acceptable as a 'worst-case' for PE, based on a fuel oil sulfur content at the SO<sub>2</sub> emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula:  $9.19(S)+3.22$ , Table 1.3-1.

\*\*\* This emissions factor will be acceptable as a 'worst-case' for PM<sub>10</sub>, based on a fuel oil sulfur content at the SO<sub>2</sub> emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula:  $7.17 [1.12(S) + 0.37]$ , Table 1.3-5.

\*\*\*\* For biofuel, the 'total' PE (filterable) emissions factor shall be used as a conservative emissions factor for PM<sub>10</sub> (filterable), due to lack of particle size distribution information being available.

EMT = emission thresholds:

39.0 tons for NO<sub>x</sub>; 39.0 tons for SO<sub>2</sub>; 24.9 tons for PE; 9.9 tons of PM<sub>10</sub>

Emission factors other than those indicated above may be used with prior approval from the Ohio EPA, Northwest District Office.  
[OAC 3745-77-07(A)(1) and PTI P0105829]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, fuel oil number 2, fuel oil number 6, or biofuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.  
[OAC 3745-77-07(C)(1) and PTI P0105829]



- (2) For each shipment of fuel oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745 18 04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240, "Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter" and D4294, "Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry", or equivalent methods as approved by the Director. [OAC 3745-77-07(C)(1) and PTI P0105829]

- (3) In lieu of d)(2) for No. 2 oil, the permittee may keep records of fuel oil supplier certification, which shall include the following information:
- a. The name of the oil supplier.
  - b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.
  - c. The sulfur content of the oil. [OAC 3745-77-07(C)(1) and PTI P0105829]
- (4) When burning #6 fuel oil, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to 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) 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.  
[OAC 3745-77-07(C)(1) and PTI P0105829]

- (5) The permittee shall maintain monthly records of the following information:
- a. the quantity of each individual fuel burned (natural gas in mmcf, oils in gallons);
  - b. the rolling 12-month summation of the usage rates for each individual fuel burned (natural gas in mmcf, oils in gallons);
  - c. the total NO<sub>x</sub> emissions from each fuel burned, calculated as follows:  
$$E_N = (U_n)(C_n) \text{ (1ton /2000 lbs) where:}$$
$$E_N = \text{NO}_x \text{ emissions from an individual fuel burned, in tons}$$
$$U_n = \text{total heat input (mmBtu) of the individual fuel - natural gas, fuel oil number 2, fuel oil number 6, biofuel}$$
$$C_n = \text{emission factor for the individual fuel in lbs NO}_x/\text{mmBtu}$$
  - d. The total NO<sub>x</sub> emission rate of all fuels burned, in tons/month, calculated as follows:  
$$EM_N = E_1 + E_2 + E_3 + \dots + E_n \text{ where:}$$
$$EM_N = \text{Monthly NO}_x \text{ emissions, in tons/month}$$
$$E_n = \text{NO}_x \text{ emissions from each individual fuel burned, in tons [from d)(5)c]}$$
  - e. The rolling 12-month NO<sub>x</sub> emission rate of all fuels burned, calculated as follows:  
$$ET_N = EM1 + EM2 + EM3 + \dots + EM12 \text{ where:}$$
$$ET_N = \text{Annual NO}_x \text{ emissions (tons) as summed from the previous 12 months of monthly NO}_x \text{ emissions;}$$
$$EM = \text{Monthly NO}_x \text{ emissions (tons/month)}$$
  - f. The total SO<sub>2</sub> emissions from each fuel burned, calculated as follows:  
$$E_S = (U_n)(C_n) \text{ (1ton /2000 lbs) where:}$$
$$E_S = \text{SO}_2 \text{ emissions from an individual fuel burned, in tons}$$
$$U_n = \text{for natural gas and vegetable oil, the total heat input (mmBtu) of each individual fuel;}$$
$$C_n = \text{emission factor for the individual fuel in lbs SO}_2 \text{ /mmBtu (for natural gas and vegetable oil) or lbs SO}_2 \text{ /gal (for fuel oil number 2 and fuel oil number 6)}$$



- g. The total SO<sub>2</sub> emission rate of all fuels burned, in tons/month, calculated as follows:

$$EM_S = E_1 + E_2 + E_3 + \dots + E_n \quad \text{where:}$$

EM<sub>S</sub> = Monthly SO<sub>2</sub> emissions, in tons/month

E<sub>n</sub> = SO<sub>2</sub> emissions from each individual fuel burned, in tons [from d)(5)f]

- h. The rolling 12-month SO<sub>2</sub> emission rate of all fuels burned, calculated as follows:

$$ET_S = EM1 + EM2 + EM3 + \dots + EM12 \quad \text{where:}$$

ET<sub>S</sub> = Annual SO<sub>2</sub> emissions (tons) as summed from the previous 12 months of monthly SO<sub>2</sub> emissions;

EM = Monthly SO<sub>2</sub> emissions (tons/month)

- i. the total (filterable) PE emissions from each fuel burned, calculated as follows:

$$E_P = (U_n)(C_n) (1\text{ton} / 2000 \text{ lbs}) \quad \text{where:}$$

E<sub>P</sub> = PE emissions from an individual fuel burned, in tons

U<sub>n</sub> = total heat input (mmBtu) of the individual fuel - natural gas, fuel oil number 2, fuel oil number 6, biofuel

C<sub>n</sub> = emission factor for the individual fuel in lbs PE/mmBtu

- j. The total PE emission rate of all fuels burned, in tons/month, calculated as follows:

$$EM_P = E_1 + E_2 + E_3 + \dots + E_n \quad \text{where:}$$

EM<sub>P</sub> = Monthly PE emissions, in tons/month

E<sub>n</sub> = PE emissions from each individual fuel burned, in tons [from d)(5)c]

- k. The rolling 12-month PE emission rate of all fuels burned, calculated as follows:

$$ET_P = EM1 + EM2 + EM3 + \dots + EM12 \quad \text{where:}$$

ET<sub>P</sub> = Annual PE emissions (tons) as summed from the previous 12 months of monthly PE emissions;

EM = Monthly PE emissions (tons/month)

- l. The total PM<sub>10</sub> emissions from each fuel burned, calculated as follows:

$$E_{P1} = (U_n)(C_n) (1\text{ton} / 2000 \text{ lbs}) \quad \text{where:}$$



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$E_{P1}$  =  $PM_{10}$  emissions from an individual fuel burned, in tons

$U_n$  = for natural gas and biofuel, the total heat input (mmBtu) of each individual fuel;

$C_n$  = emission factor for the individual fuel in lbs  $PM_{10}$  /mmBtu (for natural gas and biofuel) or lbs  $PM_{10}$  /1000 gal (for fuel oil number 2 and fuel oil number 6)

- m. The total  $PM_{10}$  emission rate of all fuels burned, in tons/month, calculated as follows:

$$EM_{P1} = E_1 + E_2 + E_3 + \dots + E_n \quad \text{where:}$$

$EM_{P1}$  = Monthly  $PM_{10}$  emissions, in tons/month

$E_n$  =  $PM_{10}$  emissions from each individual fuel burned, in tons [from d)(6)]

- n. The rolling 12-month  $PM_{10}$  emission rate of all fuels burned, calculated as follows:

$$ET_{P1} = EM1 + EM2 + EM3 + \dots + EM12 \quad \text{where:}$$

$ET_{P1}$  = Annual  $PM_{10}$  emissions (tons) as summed from the previous 12 months of monthly  $PM_{10}$  emissions;

$EM$  = Monthly  $PM_{10}$  emissions (tons/month)

[OAC 3745-77-07(C)(1) and PTI P0105829]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, fuel oil number 2, fuel oil number 6, and/or biofuel was combusted in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.  
[OAC 3745-77-07(C)(1) and PTI P0105829]
- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. 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. The reports shall be submitted electronically through Ohio EPA Air Services.  
[OAC 3745-77-07(C)(1) and PTI P0105829]
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:



- a. the rolling, 12-month SO<sub>2</sub> limitation specified in b)(1)b;
- b. the rolling, 12-month NO<sub>x</sub> limitation specified in b)(1)b;
- c. the rolling, 12-month PE limitation specified in b)(1)b;
- d. the rolling, 12-month PM<sub>10</sub> limitation specified in b)(1)b;
- e. the fuel usage restrictions, based on the calculations specified in c)(4), for summing the NO<sub>x</sub>, SO<sub>2</sub>, PE, and PM<sub>10</sub>, rolling 12-month emissions; and
- f. the use of fuel oil which did not meet the requirements specified in c)(2) or c)(3);

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC 3745-77-07(C)(1) and PTI P0105829]

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 emissions testing shall be conducted within 60 days after the next use of this boiler under this permit, for use of any fuel(s) at such time, excluding isolated non-production firing such as maintenance checks, operational test-firing, etc. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub> and CO.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
    - NO<sub>x</sub>: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A
    - CO: Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A
  - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) 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.

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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

(3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:  
0.37 lb NO<sub>x</sub> /mmBtu of actual heat input

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb NO<sub>x</sub> /mmBtu emission standard by multiplying the maximum hourly fuel oil\* combustion rate (460 gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 55 pounds NO<sub>x</sub> /1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (69 mmBtu/hr).

\* worst-case fuel, for this emissions unit

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 4 and 7 of 40 CFR, Part 60, Appendix A.  
[OAC 3745-77-07(C)(1) and PTI P0105829]

b. Emission Limitation:  
0.084 lb CO /mmBtu of actual heat input

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb CO /mmBtu emission standard by multiplying the maximum hourly natural gas combustion rate (0.0657 mmcu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 84 pounds CO /mm cu. ft. of natural gas and dividing by the maximum heat input to the boiler (69 mmBtu/hr).

\* worst-case fuel, for this emissions unit



If required, the permittee shall demonstrate compliance in accordance with Methods 1- 4 and 10 of 40 CFR, Part 60, Appendix A.  
[OAC 3745-77-07(C)(1) and PTI P0105829]

- c. Emission Limitation:  
1.6 pounds SO<sub>2</sub> /mmBtu of actual heat input

Applicable Compliance Method:  
Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated in accordance with the recordkeeping and calculations specified in d)(2) and d)(3) as applicable.

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

When firing natural gas or biofuel, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.  
[OAC 3745-77-07(C)(1) and PTI P0105829]

- d. Emission Limitation:  
0.11 pound particulate emissions (PE) /mmBtu of actual heat input (when firing No. 6 fuel oil or biofuel)

Applicable Compliance Method:  
Compliance may be determined by multiplying the maximum fuel firing capacity of the emissions unit (460 gallons/hour, for No. 6) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 6 fuel oil (16.5\* lbs PE/1000 gallons), and then dividing by the emissions unit's maximum heat input capacity (69 mmBtu/hr).

\* 16.5 lbs of PE /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98]  $9.19 \times 1.45 + 3.22$  )

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 5 of 40 CFR, Part 60, Appendix A.  
[OAC 3745-77-07(C)(1) and PTI P0105829]

- e. Emission Limitation:  
0.020 lb PE /mmBtu of actual heat input (when firing natural gas and/or No. 2 fuel oil)

Applicable Compliance Method:  
Compliance may be determined by multiplying the maximum fuel firing capacity of the emissions unit (493 gallons/hour, for No. 2) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 fuel oil (2 lbs PE/1000 gallons), and then dividing by the emissions unit's maximum heat input capacity (69 mmBtu/hr).



If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC 3745-77-07(C)(1) and PTI P0105829]

f. Emission Limitation:

0.10 pound PM<sub>10</sub> (filterable) /mmBtu of actual heat input (when firing No. 6 fuel oil or biofuel)

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum fuel firing capacity of the emissions unit (460 gallons/hour, for No. 6) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 6 fuel oil (14.3\* lbs PE/1000 gallons), and then dividing by the emissions unit's maximum heat input capacity (69 mmBtu/hr).

\* 14.3 lbs of PE /1000 gallons {AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [Sept 98] 7.17 [1.12(1.45) + 0.37 ]}

If required, the permittee shall demonstrate compliance in accordance with Method 201 or 201A of 40 CFR 51, Appendix M.

[OAC 3745-77-07(C)(1) and PTI P0105829]

g. Emission Limitation:

0.0079 lb PM<sub>10</sub> (filterable) /mmBtu of actual heat input (when firing natural gas and/or No. 2 fuel oil)

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum fuel firing capacity of the emissions unit (493 gallons/hour, for No. 2) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 fuel oil (1.1\* lbs PM<sub>10</sub> /1000 gallons), and then dividing by the emissions unit's maximum heat input capacity (69 mmBtu/hr).

\* PM<sub>10</sub> (filterable) from burning fuel oil number 2 is based on 55% of PE (0.55 fraction based on AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-7 [9/98])

If required, the permittee shall demonstrate compliance in accordance with Method 201 or 201A of 40 CFR 51, Appendix M.

[OAC 3745-77-07(C)(1) and PTI P0105829]

h. Emission Limitation

39.0 tons of NO<sub>x</sub> per rolling, 12-month period

Applicable Compliance Method

Compliance with the above emission limitation shall be demonstrated through record keeping requirements in d)(5).

[OAC 3745-77-07(C)(1) and PTI P0105829]



- i. Emission Limitation  
39.0 tons of SO<sub>2</sub> per rolling, 12-month period  
  
Applicable Compliance Method  
Compliance with the above emission limitation shall be demonstrated through record keeping requirements in d)(5).  
[OAC 3745-77-07(C)(1) and PTI P0105829]
  
- j. Emission Limitation:  
24.9 tons of PE per rolling 12-month period  
  
Applicable Compliance Method:  
Compliance with the above emission limitation shall be demonstrated through recordkeeping requirements in d)(5).  
[OAC 3745-77-07(C)(1) and PTI P0105829]
  
- k. Emission Limitation  
9.9 tons of PM<sub>10</sub> per rolling, 12-month period  
  
Applicable Compliance Method  
Compliance with the above emission limitation shall be demonstrated through record keeping requirements in d)(5).  
[OAC 3745-77-07(C)(1) and PTI P0105829]
  
- l. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  
  
Applicable Compliance Method:  
Compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).  
[OAC 3745-77-07(C)(1) and PTI P0105829]

g) Miscellaneous Requirements

- (1) None.



**2. B005, #3 Boiler**

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

Boiler 3 - 104.3 mmBtu/hr -natural gas / No. 2 fuel oil / No. 6 fuel oil / vegetable oil 'biofuel'

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a) (PTI P0105828 issued December 28, 2009)	Short-term emission limits for natural gas:  0.20 lb of particulate matter (filterable) 10 microns or less (PM <sub>10</sub> ) /hr  7.51 lbs of nitrogen oxide (NO <sub>x</sub> ) /hr  1.15 lbs of organic compounds (OC) /hr  8.76 lbs of carbon monoxide (CO) /hr  Short-term emission limits for oil(s):  175 lbs of SO <sub>2</sub> /hr;  20.9 lbs of NO <sub>x</sub> /hr;  3.75 lbs of CO /hr  11.5 lbs of particulate emissions (PE) /hr when burning No. 6 oil or biofuel;  1.50 lbs of PE /hr when burning No. 2 oil  9.94 lbs of PM <sub>10</sub> (filterable) /hour when burning No. 6 oil or biofuel;  0.83 lbs of PM <sub>10</sub> (filterable) /hour when burning No. 2 oil



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Long-term emission limits for burning oil(s):  38.4 tons of CO/year;  5.04 tons of OC/year  See b)(2)d.
b.	OAC rule 3745-31-05(D)	39.4 tons of NO <sub>x</sub> per rolling 12-month period [See b)(2)a]  39.3 tons of SO <sub>2</sub> per rolling 12-month period [See b)(2)a]  24.9 tons of PE per rolling 12-month period [See b)(2)a]  9.74 tons of PM <sub>10</sub> per rolling 12-month period [See b)(2)a]
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
d.	40 CFR 60.40c et seq. (NSPS Subpart Db)	See b)(2)b.
e.	OAC rule 3745-17-10 (B)(1)	See b)(2)c.
f.	OAC rule 3745-17-10(C)(2)	See b)(2)c.
g.	OAC rule 3745-18-06(D)	See b)(2)c.
h.	OAC rule 3745-21-08(B)	See b)(2)e.
i.	40 CFR 63.52(a)(2)	See b)(2)f.

(2) Additional Terms and Conditions

- a. Annual emissions shall not exceed the following, based upon a rolling, 12-month summation of the monthly emissions:
- i. 39.4 tons of NO<sub>x</sub>
  - ii. 39.3 tons of SO<sub>2</sub>
  - iii. 24.9 tons of PE
  - iv. 9.74 tons of PM<sub>10</sub>

The emission limitations are based on fuel usage restrictions [see c)(4)] for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability.



- b. 40 CFR Part 60, Subpart Db, is not applicable to this emissions unit due to the fact that construction, modification, or reconstruction of the unit occurred prior to June 19, 1984 (at a different facility).
- c. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).
- d. The requirements of OAC rule 3745-31-05(A)(3)(a) also include compliance with the requirements of OAC rule 3745-31-05(D).
- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- f. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) **Operational Restrictions**

- (1) The permittee shall only burn natural gas, fuel oil number 2, fuel oil number 6, or biofuel in this emissions unit.  
[OAC 3745-77-07(A)(1) and PTI P0105828]
- (2) The fuel oil number 2 combusted in this emissions unit shall only be fuel oil number 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils". The sulfur content of the fuel oil number 2 shall contain no more than 0.5 weight percent sulfur.  
[OAC 3745-77-07(A)(1) and PTI P0105828]
- (3) The fuel oil number 6 combusted in this emissions unit shall only be fuel oil number 6, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils" and shall meet the following requirements: the fuel oil



number 6 shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission standard specified in OAC 3745-18-06(D).  
 [OAC 3745-77-07(A)(1) and PTI P0105828]

The maximum rolling, 12-month quantity of fuel burned in this emissions unit shall be limited by the following equation. The criteria of the limiting equation must be met for NO<sub>x</sub>, SO<sub>2</sub>, PE, and PM<sub>10</sub> (meaning the calculated results for NO<sub>x</sub>, SO<sub>2</sub>, PE, and PM<sub>10</sub> must not exceed 39.4, 39.3, and 9.74 tons, respectively).

$$\sum_{M=1}^{12} \sum_n [(U_n)(C_n) (1 \text{ ton} / 2000 \text{ lbs})] \leq \text{EMT}$$

where:

M = the increment of the rolling 12-month period;  
 n = the increment of the fuel usage input during the period;

U<sub>n</sub> = total fuel usage, cubic feet of natural gas, gallons or mmBtu heat input of oil, for each individual fuel type in the units of the factor applied, for: natural gas, fuel oil number 2, fuel oil number 6, biofuel

C<sub>n</sub> = emission factor for the individual fuel:

0.20 lb NO<sub>x</sub> /mmBtu (biofuel)  
 0.072 lb NO<sub>x</sub> /mmcf of natural gas  
 0.118 lb NO<sub>x</sub> /mmBtu (fuel oil number 2 and fuel oil number 6)

0.0015 lb SO<sub>2</sub> /mmBtu (biofuel)  
 0.6 lb SO<sub>2</sub> /mmcf of natural gas  
 157(S\*) lbs SO<sub>2</sub> /1000 gallons of fuel oil number 6  
 142(S\*) lbs SO<sub>2</sub> /1000 gallons of fuel oil number 2

1.9 lbs PE/mmcf of natural gas  
 16.5\*\* lbs PE/1000 gallons of fuel oil number 6  
 2 lbs PE/1000 gallons of fuel oil number 2  
 0.07 lbs PE/mmBtu (biofuel)

1.9 lbs PM<sub>10</sub> (filterable) /mmcf of natural gas  
 14.3\*\*\* lbs PM<sub>10</sub> (filterable) /1000 gallons of fuel oil number 6  
 1.1 lbs PM<sub>10</sub> (filterable) /1000 gallons of fuel oil number 2  
 0.07 lbs PM<sub>10</sub> (filterable) /mmBtu (biofuel)\*\*\*\*

\* S = sulfur content, weight percent

\*\* This emissions factor will be acceptable as a 'worst-case' for PE, based on a fuel oil sulfur content at the SO<sub>2</sub> emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula: 9.19(S)+3.22, Table 1.3-1.



\*\*\* This emissions factor will be acceptable as a 'worst-case' for PM<sub>10</sub>, based on a fuel oil sulfur content at the SO<sub>2</sub> emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula:  $7.17 [1.12(S) + 0.37]$ , Table 1.3-5.

\*\*\*\* For biofuel, the 'total' PE (filterable) emissions factor shall be used as a conservative emissions factor for PM<sub>10</sub> (filterable), due to the lack of particle size distribution information being available.

EMT = emissions threshold:  
39.4 tons for NO<sub>x</sub>; 39.3 tons for SO<sub>2</sub>; 24.9 tons for PE; 9.74 tons for PM<sub>10</sub>

Emission factors other than those indicated above may be used with prior approval from the Ohio EPA, Northwest District Office.  
[OAC 3745-77-07(A)(1) and PTI P0105828]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, fuel oil number 2, fuel oil number 6, or biofuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.  
[OAC 3745-77-07(C)(1) and PTI P0105828]

(2) For each shipment of fuel oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745 18 04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240, "Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter" and D4294, "Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry", or equivalent methods as approved by the Director.  
[OAC 3745-77-07(C)(1) and PTI P0105828]

(3) In lieu of the requirements of d)(2) for No. 2 oil for sulfur, the permittee may keep records of fuel oil supplier certification, which shall include the following information:

- a. The name of the oil supplier.
- b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.



- c. The sulfur content of the oil.  
[OAC 3745-77-07(C)(1) and PTI P0105828]
- (4) When burning # 6 fuel oil, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to 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) 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.

[OAC 3745-77-07(C)(1) and PTI P0105828]

- (5) The permittee shall maintain monthly records of the following information:
  - a. the quantity of each individual fuel burned (natural gas in mmcf, oils in gallons);
  - b. the rolling 12-month summation of the usage rates for each individual fuel burned (natural gas in mmcf, oils in gallons);
  - c. the total NO<sub>x</sub> emissions from each fuel burned, calculated as follows:  
$$E_N = (U_n)(C_n) (1\text{ton} / 2000 \text{ lbs}) \quad \text{where:}$$
$$E_N = \text{NO}_x \text{ emissions from an individual fuel burned, in tons}$$
$$U_n = \text{total heat input (mmBtu) of the individual fuel - natural gas, fuel oil number 2, fuel oil number 6, biofuel}$$
$$C_n = \text{emission factor for the individual fuel in lbs NO}_x/\text{mmBtu}$$
  - d. The total NO<sub>x</sub> emission rate of all fuels burned, in tons/month, calculated as follows:

$$EM_N = E_1 + E_2 + E_3 + \dots + E_n \quad \text{where:}$$



**Effective Date:** To be entered upon final issuance

$EM_N$  = Monthly  $NO_x$  emissions, in tons/month

$E_n$  =  $NO_x$  emissions from each individual fuel burned, in tons [from d)(5)c]

- e. The rolling 12-month  $NO_x$  emission rate of all fuels burned, calculated as follows:

$ET_N = EM1 + EM2 + EM3 + \dots + EM12$  where:

$ET_N$  = Annual  $NO_x$  emissions (tons) as summed from the previous 12 months of monthly  $NO_x$  emissions;

$EM$  = Monthly  $NO_x$  emissions (tons/month)

- f. The total  $SO_2$  emissions from each fuel burned, calculated as follows:

$E_S = (U_n)(C_n)$  (1ton /2000 lbs) where:

$E_S$  =  $SO_2$  emissions from an individual fuel burned, in tons

$U_n$  = for natural gas and vegetable oil, the total heat input (mmBtu) of each individual fuel;

$C_n$  = emission factor for the individual fuel in lbs  $SO_2$  /mmBtu (for natural gas and vegetable oil) or lbs  $SO_2$  /gal (for fuel oil number 2 and fuel oil number 6)

- g. The total  $SO_2$  emission rate of all fuels burned, in tons/month, calculated as follows:

$EM_S = E_1 + E_2 + E_3 + \dots + E_n$  where:

$EM_S$  = Monthly  $SO_2$  emissions, in tons/month

$E_n$  =  $SO_2$  emissions from each individual fuel burned, in tons [from d)(5)f]

- h. The rolling 12-month  $SO_2$  emission rate of all fuels burned, calculated as follows:

$ET_S = EM1 + EM2 + EM3 + \dots + EM12$  where:

$ET_S$  = Annual  $SO_2$  emissions (tons) as summed from the previous 12 months of monthly  $SO_2$  emissions;

$EM$  = Monthly  $SO_2$  emissions (tons/month)

- i. the total (filterable) PE emissions from each fuel burned, calculated as follows:

$E_P = (U_n)(C_n)$  (1ton /2000 lbs) where:

$E_P$  = PE emissions from an individual fuel burned, in tons

$U_n$  = total heat input (mmBtu) of the individual fuel - natural gas, fuel oil number 2, fuel oil number 6, biofuel



$C_n$  = emission factor for the individual fuel in lbs PE/mmBtu

- j. The total PE emission rate of all fuels burned, in tons/month, calculated as follows:

$$EM_P = E_1 + E_2 + E_3 + \dots + E_n \quad \text{where:}$$

$EM_P$  = Monthly PE emissions, in tons/month

$E_n$  = PE emissions from each individual fuel burned, in tons [from d)(5)c]

- k. The rolling 12-month PE emission rate of all fuels burned, calculated as follows:

$$ET_P = EM1 + EM2 + EM3 + \dots + EM12 \quad \text{where:}$$

$ET_P$  = Annual PE emissions (tons) as summed from the previous 12 months of monthly PE emissions;

$EM$  = Monthly PE emissions (tons/month)

- l. The total  $PM_{10}$  emissions from each fuel burned, calculated as follows:

$$E_{P1} = (U_n)(C_n) (1\text{ton} / 2000 \text{ lbs}) \quad \text{where:}$$

$E_{P1}$  =  $PM_{10}$  emissions from an individual fuel burned, in tons

$U_n$  = for natural gas and biofuel, the total heat input (mmBtu) of each individual fuel;

$C_n$  = emission factor for the individual fuel in lbs  $PM_{10}$  /mmBtu (for natural gas and biofuel) or lbs  $PM_{10}$  /1000 gal (for fuel oil number 2 and fuel oil number 6)

- m. The total  $PM_{10}$  emission rate of all fuels burned, in tons/month, calculated as follows:

$$EM_{P1} = E_1 + E_2 + E_3 + \dots + E_n \quad \text{where:}$$

$EM$  = Monthly  $PM_{10}$  emissions, in tons/month

$E_n$  =  $PM_{10}$  emissions from each individual fuel burned, in tons [from d)(6)]

- n. The rolling 12-month  $PM_{10}$  emission rate of all fuels burned, calculated as follows:

$$ET_{P1} = EM1 + EM2 + EM3 + \dots + EM12 \quad \text{where:}$$

$ET$  = Annual  $PM_{10}$  emissions (tons) as summed from the previous 12 months of monthly  $PM_{10}$  emissions;

$EM$  = Monthly  $PM_{10}$  emissions (tons/month)

[OAC 3745-77-07(C)(1) and PTI P0105828]



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, fuel oil number 2, fuel oil number 6, and/or biofuel was combusted in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.  
[OAC 3745-77-07(C)(1) and PTI P0105828]
- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. 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. The reports shall be submitted electronically through Ohio EPA Air Services.  
[OAC 3745-77-07(C)(1) and PTI P0105828]
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
  - a. the rolling, 12-month SO<sub>2</sub> limitation specified in b)(1)b;
  - b. the rolling, 12-month NO<sub>x</sub> limitation specified in b)(1)b;
  - c. the rolling, 12-month PE limitation specified in b)(1)b;
  - d. the rolling, 12-month PM<sub>10</sub> limitation specified in b)(1)b;
  - e. the fuel usage restrictions, based on the calculations specified in c)(4), for summing the NO<sub>x</sub>, SO<sub>2</sub>, PE, and PM<sub>10</sub>, rolling 12-month emissions; and
  - f. the sulfur content restriction for fuel oil number 2 or fuel oil number 6;
  - g. the use of fuel oil number 2 which did not meet the requirement specified in c)(2); and
  - h. the use of fuel oil number 6 which did not meet the requirement specified in c)(3).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).  
[OAC 3745-77-07(C)(1) and PTI P0105828]



f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. Fuel oil and/or biofuel: The emissions testing shall be conducted within 60 days after beginning any use of these fuels under this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub> and CO.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:  
NO<sub>x</sub>: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A  
CO: Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A
  - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).  
[OAC 3745-77-07(C)(1)]
- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) 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.

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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):



- a. Emission Limitations: (Short-term emission limits for burning natural gas)
- 7.51 lbs of NO<sub>x</sub> /hr
  - 8.76 lbs of CO /hr
  - 1.15 lbs of OC /hr
  - 0.20 lb of PM<sub>10</sub> /hr

Applicable Compliance Method

The hourly emission limitations are based on a maximum natural gas usage rate of 104,333 mmcf per hour and the following emission factors:

NO<sub>x</sub>: 0.072 lb of NO<sub>x</sub> /MMBTU (manufacturer's guaranteed specification)

CO: 84 lbs of CO /mmcf (AP-42 Section 1.4, Natural Gas Combustion Table 1.4-1 [7/98])

OC: 11 lbs of TOC/mmcf (AP-42 Section 1.4, Natural Gas Combustion Table 1.4-2 [7/98])

PM<sub>10</sub>: 1.9 lbs of PM<sub>10</sub> (filterable) /mmcf (AP-42 Section 1.4, Natural Gas Combustion, Table 1.4-2 [7/98]) Note: For natural gas, all PE is PM<sub>10</sub>.

Compliance with the NO<sub>x</sub> and CO limitations was demonstrated by emission testing conducted on September 22, 2005. If required, the permittee shall further demonstrate compliance with the emission limitations through emission tests performed in accordance with:

NO<sub>x</sub>: Methods 1- 4, and 7 of 40 CFR 60, Appendix A

CO: Methods 1- 4, and 10 of 40 CFR 60, Appendix A

PM<sub>10</sub>: Method 201 or 201A of 40 CFR 51, Appendix M

OC: Methods 1 through 4 and 18, 25, or 25a of 40 CFR 60, Appendix A [OAC 3745-77-07(C)(1) and PTI P0105828]

- b. Emission Limitations:  
(Short-term emission limits for burning fuel oil number 2, fuel oil number 6, and biofuel)

175 lbs of SO<sub>2</sub> /hr

20.9 lbs of NO<sub>x</sub> /hr

3.75 lbs of CO /hr

11.5 lbs of PE /hr when burning fuel oil number 6 or biofuel

1.50 lbs of PE /hr when burning fuel oil number 2

9.94 lbs of PM<sub>10</sub> /hr when burning fuel oil number 6 or biofuel

0.83 lbs of PM<sub>10</sub> /hr when burning fuel oil number 2

Applicable Compliance Method:

The hourly emission limitations are based on the following:

SO<sub>2</sub>: 157 lbs of SO<sub>2</sub> /1000 gallons x S\* (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98])

\* S = sulfur content of oil as indicated in AP-42



NO<sub>x</sub> is based on a maximum biofuel (vegetable oil) usage rate of 824 gallons per hour, a heat content of 126550 Btu/gallon, and an emission factor of 0.20 lb of NO<sub>x</sub>/mmBtu (manufacturer's guaranteed specification)

CO is based on a maximum number 2 fuel oil usage rate of 750 gallons per hour and an emission factor of 5 lbs of CO /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98])

PE (from burning fuel oil number 6 or biofuel) is based on a maximum number 6 fuel oil usage rate of 695 gallons per hour and the following emission factors:

PE: 16.5 lbs of PE /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98]  $9.19 \times 1.45 + 3.22$  )

PM<sub>10</sub> (from burning fuel oil number 6 or biofuel) is based on a maximum number 6 fuel oil usage rate of 695 gallons per hour and the following emission factors:

PM<sub>10</sub>: 14.3 lbs of PE /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98]  $7.17 [1.12(1.45) + 0.37]$  )

PE from burning fuel oil number 2 is based on a maximum number 2 fuel oil usage rate of 750 gallons and an emission factor of 2 lbs of PE /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98])

PM<sub>10</sub> (filterable) from burning fuel oil number 2 is based on 55% of PE (0.55 fraction based on AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-7 [9/98])

Compliance with the NO<sub>x</sub>, CO, and PM<sub>10</sub> limitations has been demonstrated by emission testing conducted on September 22, 2005. If required, the permittee shall further demonstrate compliance with the emission limitations through emission tests performed in accordance with:

NO<sub>x</sub>: Methods 1- 4, and 7 of 40 CFR 60, Appendix A

CO: Methods 1- 4, and 10 of 40 CFR 60, Appendix A

PE: Methods 1- 5 of 40 CFR 60, Appendix A

PM<sub>10</sub>: Method 201 or 201A of 40 CFR 51, Appendix M

SO<sub>2</sub>: Methods 1- 4, and 6 of 40 CFR 60, Appendix A

[OAC 3745-77-07(C)(1) and PTI P0105828]

c. Emission Limitations:

(Long-term emission limits for burning natural gas, fuel oil number 2, fuel oil number 6, and biofuel)

38.4 tons of CO/year

5.04 tons of OC/year

Applicable Compliance Method:

The annual emission limitations for CO and OC are based the combustion of natural gas which represents a "worst case scenario" for these pollutants. The annual limitations were established by multiplying the maximum hourly emission



rates by an operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitations for CO and OC when burning natural gas, compliance with the annual limitations will be assumed.

[OAC 3745-77-07(C)(1) and PTI P0105828]

- d. Emission Limitation:  
39.4 tons of NO<sub>x</sub> per rolling 12-month period

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through recordkeeping requirements in d)(5).

[OAC 3745-77-07(C)(1) and PTI P0105828]

- e. Emission Limitation:  
39.3 tons of SO<sub>2</sub> per rolling 12-month period

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through recordkeeping requirements in d)(5).

[OAC 3745-77-07(C)(1) and PTI P0105828]

- f. Emission Limitation:  
24.9 tons of PE per rolling 12-month period

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through recordkeeping requirements in d)(5).

[OAC 3745-77-07(C)(1) and PTI P0105828]

- g. Emission Limitation:  
9.74 tons of PM<sub>10</sub> per rolling 12-month period

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through recordkeeping requirements in d)(5).

[OAC 3745-77-07(C)(1) and PTI P0105828]

- h. Emission Limitation:  
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1) and PTI P0105828]

- g) Miscellaneous Requirements

- (1) None.



**3. F007, Column Dryer**

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

Column dryer for bean drying - 5000 bushel/hour, with enclosed conveying

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 60.300 et seq. (NSPS Subpart DD)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) (PTI 03-13219 issued July 28, 1999)	107 tons fugitive particulate emissions (PE)/year  26.8 tons fugitive particulate matter less than 10 microns (PM <sub>10</sub> )/year  3.62 pounds fugitive nitrogen oxides (NO <sub>x</sub> )/hour, 11.8 tons NO <sub>x</sub> /year  3.04 pounds fugitive carbon monoxide (CO)/hour, 9.88 tons CO/year  Visible fugitive PE shall not exceed 20 percent opacity as a 3-minute average.  See b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	none [See b)(2)c.]
d.	OAC rule 3745-17-08(B)(1)	none [See b)(2)d.]

(2) Additional Terms and Conditions

a. The column plate perforations shall not exceed 0.094 inch. [40 CFR 60.302(a)(1)]

b. The requirements of this rule also include compliance with the requirements of 40 CFR 60.300 et seq. (NSPS Subpart DD).



- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- d. The 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)(1).

c) Operational Restrictions

- (1) This emissions unit shall not operate more than 6500 hours per year.  
[OAC 3745-77-07(A)(1) and PTI 03-13219]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any fugitive dust emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize 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 (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.  
[OAC 3745-77-07(C)(1) and PTI 03-13219]

- (2) The permittee shall maintain monthly records of the number of hours of operation for this emissions unit in: hours per month; and total hours, to date, for the calendar year.  
[OAC 3745-77-07(C)(1) and PTI 03-13219]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Northwest



District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC 3745-77-07(C)(1) and PTI 03-13219]

- (2) The permittee shall submit annual reports of the number of hours this emissions unit was in operation.

This report shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC 3745-77-07(C)(1) and PTI 03-13219]

f) **Testing Requirements**

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. **Emission Limitation:**  
107 tons PE/year

**Applicable Compliance Method:**

Compliance with annual allowable PE limitation shall be determined by multiplying the emission factor of 0.22 pound PE/ton (AP-42, Table 9.9.1 (revised 5/98)) by the annual number of hours the emissions unit was in operation (this is calculated by summing the 12 monthly numbers of hours the emissions unit was in operation [from d)(2)] for the calendar year), and then multiplying by the maximum hourly production rate (tons/hour).

[OAC 3745-77-07(C)(1) and PTI 03-13219]

- b. **Emission Limitation:**  
26.8 tons PM<sub>10</sub>/year

**Applicable Compliance Method:**

Compliance with annual allowable PM<sub>10</sub> emission limitation shall be determined by multiplying the emission factor of 0.055 pound PM<sub>10</sub>/ton (AP-42, Table 9.9.1 (revised 5/98)) by the annual number of hours the emissions unit was in operation (this is calculated by summing the 12 monthly numbers of hours the emissions unit was in operation [from d)(2)] for the calendar year), and then multiplying by the maximum hourly production rate (tons/hour).

[OAC 3745-77-07(C)(1) and PTI 03-13219]

- c. **Emission Limitations:**  
3.62 pounds fugitive NO<sub>x</sub>/hour, 11.8 tons NO<sub>x</sub>/year

**Applicable Compliance Method:**

Compliance with the hourly allowable NO<sub>x</sub> emission limitation may be determined by multiplying the natural gas emission factor of 100 pounds NO<sub>x</sub>/mm cu. ft (AP-42, Table 1.4-1 (revised 3/98)) by the maximum natural gas combustion rate (mm cu. ft/hr).



The annual allowable NO<sub>x</sub> limitation was developed by multiplying the hourly limitation by 6500, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation and the annual operational hours limit is shown, compliance with the annual limitation shall be assumed.  
[OAC 3745-77-07(C)(1) and PTI 03-13219]

- d. Emission Limitations:  
3.04 pounds fugitive CO/hour, 9.88 tons CO/year

**Applicable Compliance Method:**

Compliance with the hourly allowable CO emission limitation may be determined by multiplying the natural gas emission factor of 84 pound CO/mm cu. ft (AP-42, Table 1.4-1 (revised 3/98) by the maximum natural gas combustion rate (mm cu. ft/hr).

The annual allowable CO limitation was developed by multiplying the hourly limitation by 6500, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation and the annual operational hours limit is shown, compliance with the annual limitation shall be assumed.  
[OAC 3745-77-07(C)(1) and PTI 03-13219]

- e. Emission Limitation:  
Visible fugitive PE shall not exceed 20 percent opacity as a 3-minute average.

**Applicable Compliance Method:**

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.  
[OAC 3745-77-07(C)(1) and PTI 03-13219]

g) **Miscellaneous Requirements**

- (1) The Permit to Install (PTI) for this emissions unit allowed the permittee to replace an existing rack dryer with a new column dryer. Increases in facility allowable emissions as a result of the replacement equate to 39.75 tons of PE per year and 9.94 tons of PM<sub>10</sub> per year.



4. F008, Rail to Truck Meal

Operations, Property and/or Equipment Description:

Rail meal receiving with truck loadout

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-16213 issued July 22, 2004)	8.10 tons of fugitive particulate emissions (PE)/year  Visible fugitive PE shall not exceed 20% opacity as a three-minute average  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)a.]
b.	OAC rule 3745-17-07(B)(1)	none [See b)(2)b.]
c.	OAC rule 3745-17-08(B)(1)	none [See b)(2)c.]

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures for this emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee maintains that the inherent moisture content of the meal is at a level that is more than sufficient to comply with all applicable requirements. If at any time the moisture content is not sufficient to meet the above applicable requirements, the permittee shall employ best available control measures to ensure compliance.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c. The 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)(1).



c) Operational Restrictions

- (1) The maximum annual quantity of meal received shall not exceed 30,000 tons.  
[OAC 3745-77-07(A)(1) and PTI 03-16213]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any fugitive dust emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize 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 (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.  
[OAC 3745-77-07(C)(1) and PTI 03-16213]

- (2) The permittee shall maintain monthly records of the amount of meal received for this emissions unit in: tons per month; and total tons, to date, for the calendar year.  
[OAC 3745-77-07(C)(1) and PTI 03-16213]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.  
[OAC 3745-77-07(C)(1) and PTI 03-16213]
- (2) The permittee shall submit annual reports of the quantity of meal received for this emissions unit.



This report shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC 3745-77-07(C)(1) and PTI 03-16213]

f) Testing Requirements

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

a. Emission Limitation:  
8.10 tons of fugitive PE/year

Applicable Compliance Method:

The permittee shall determine compliance with the above emission limitation by multiplying the annual meal throughput of 60,000 tons\* by an emission factor of 0.27 lb of PE/ton of meal loaded/received (AP-42 Section 9.11.1, Vegetable Oil Processing, Table 9.11.1-1 [11/95]) and dividing by 2000 lbs. Therefore provided compliance is shown with the maximum annual quantity of meal received, compliance with the annual limitation will be assumed.

\* 60,000 tons includes 30,000 tons of meal received each year and 30,000 tons of meal loaded into trucks each year

[OAC 3745-77-07(C)(1) and PTI 03-16213]

b. Emission Limitation:  
Visible fugitive PE shall not exceed 20% opacity as a three-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

[OAC 3745-77-07(C)(1) and PTI 03-16213]

g) Miscellaneous Requirements

(1) None.



5. P011, Meal Grinders

Operations, Property and/or Equipment Description:

Meal sifting and grinding - with process baghouse

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	24.7 lbs particulate emissions (PE) /hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 0.5 to 5.0 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.  
[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
  - b. an identification of each incident of deviation described in (a) above where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC 3745-77-07(C)(1)]



f) Testing Requirements

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

a. Emission Limitation:  
24.7 lbs PE /hr

Applicable Compliance Method:

Compliance with the hourly limitation may be determined by multiplying the maximum baghouse outlet concentration of 0.03 gr/dscf by the baghouse's maximum volumetric air flow rate (11,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

[OAC 3745-77-07(C)(1)]

b. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**6. P013, Extraction**

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

Oil extraction

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR, Part 63, Subpart GGGG (40 CFR 63.2830 - 63.2872)	See 40 CFR 63.2840 [Table 1 (ix)] Solvent Loss Factor (SLF) - 0.2 gallon Hazardous Air Pollutant (HAP) /ton oilseed  See b)(2)a.
b.	40 CFR 63.1-15 (40 CFR 63.2870 Table 1 of Subpart GGGG)	Table 1 in Section 63.2870 of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGG shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-21-07(G)(2)	See b)(2)m and c)(1).

(2) Additional Terms and Conditions

a. HAP loss requirements:

i. The emission requirements limit the number of gallons of HAP lost per ton of listed oilseeds processed. For each operating month, the permittee must calculate a compliance ratio which compares the actual HAP loss to the allowable HAP loss for the previous 12 operating months as shown in Equation 1 of this section. An operating month, as defined in 40 CFR 63.2872, is any calendar month in which a source processes a listed oilseed, excluding any entire calendar month in which the source operated under an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2). Equation 1 of this section follows:



Compliance Ratio = Actual HAP Loss / Allowable HAP Loss

- ii. Equation 1 of this section can also be expressed as a function of total solvent loss as shown in Equation 2 of this section. Equation 2 of this section follows:

Compliance Ratio = [(f) x (Actual Solvent Loss)] / [0.64 x Oilseed x SLF]

Where:

f = The weighted average volume fraction of HAP in solvent received during the previous 12 operating months, as determined in 40 CFR 63.2854, dimensionless.

0.64 = The average volume fraction of HAP in solvent in the baseline performance data, dimensionless.

Actual Solvent Loss = Gallons of actual solvent loss during previous 12 operating months, as determined in 40 CFR 63.2853.

Oilseed = Tons of oilseed processed during the previous 12 operating months, as shown in 40 CFR 63.2855 (conventional process).

SLF = The corresponding solvent loss factor (gal/ton) for conventional oilseed listed in Table 1 (0.2).

[40 CFR 63.2840(a)]

- b. When the source has processed listed oilseed for 12 operating months, calculate the compliance ratio by the end of each calendar month following an operating month using Equation 2 of this section. When calculating your compliance ratio, consider the following conditions and exclusions:
- i. If the source processes any quantity of listed oilseeds in a calendar month and the source is not operating under an initial startup period or malfunction period subject to 40 CFR 63.2850, then the permittee must categorize the month as an operating month, as defined in 40 CFR 63.2872.
  - ii. The 12-month compliance ratio may include operating months occurring prior to a source shutdown and operating months that follow after the source resumes operation.
  - iii. If the source shuts down and processes no listed oilseed for an entire calendar month, then the permittee must categorize the month as a non-operating month, as defined in 40 CFR 63.2872. Exclude any non-operating months from the compliance ratio determination.
  - iv. If the source is subject to an initial startup period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the initial startup period.



- v. If the source is subject to a malfunction period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the malfunction period.  
[40 CFR 63.2840(b)]
  
- c. If the compliance ratio is less than or equal to 1.00, the source was in compliance with the HAP emission requirements for the previous operating month.  
[40 CFR 63.2840(c)]
  
- d. The permittee, i.e. you, shall:
  - i. Maintain all the necessary records you have used to demonstrate compliance with Subpart GGGG in accordance with 40 CFR 63.2862.
  - ii. Submit the reports as specified in 40 CFR 63.2850(a)(5).
  - iii. Submit all notifications and reports and maintain all records required by the MACT General Provisions for performance testing if you add a control device that destroys solvent.  
[40 CFR 63.2850(a)(4), (5), and (6)]
  
- e. Existing sources under normal operation: The permittee must meet all of the requirements listed in Table 1 of 40 CFR 63.2850 for sources under normal operation.  
[40 CFR 63.2850(b)]
  
- f. Existing or new sources that have been significantly modified: An existing or new source that has been significantly modified must meet the requirements associated with one of two compliance options. Within 15 days of the modified source startup date, you must choose to comply with one of the options listed in f.i or f.ii as follows:
  - i. Normal operation. Upon startup of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources under normal operation, and the schedules for demonstrating compliance for an existing or new source that has been significantly modified in Table 2 of that section.
  - ii. Initial startup period. For up to 3 calendar months after the startup date of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating under an initial startup period, and the schedules for demonstrating compliance for a significantly modified existing or new source operating under an initial startup period in Table 2 of that section. After a maximum of 3 calendar months, a new or existing source must meet all of the requirements listed in Table 1 of that section for sources under normal operation.  
[40 CFR 63.2850(d)]



- g. Existing or new sources experiencing a malfunction: A malfunction is defined in 40 CFR 63.2. In general, it means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or process equipment to function in a usual manner. If an existing or new source experiences an unscheduled shutdown as a result of a malfunction, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, then the permittee must meet the requirements associated with one of two compliance options. Routine or scheduled process startups and shutdowns resulting from, but not limited to, market demands, maintenance activities, and switching types of oilseed processed, are not startups or shutdowns resulting from a malfunction and, therefore, do not qualify for this provision. Within 15 days of the beginning date of the malfunction, the permittee must choose to comply with one of the options listed in 'i' or 'ii' as follows:

  - i. Normal operation. The source must meet all of the requirements listed in 40 CFR 63.2850(a) and one of the options listed in 40 CFR 63.2850(e)(1)(i) through (iii).
  - ii. Malfunction period. Throughout the malfunction period, you must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating during a malfunction period. At the end of the malfunction period, the source must then meet all of the requirements listed in Table 1 of that section for sources under normal operation.  
[40 CFR 63.2850(e)]
- h. The permittee must develop a written SSM plan in accordance with 40 CFR 63.6(e)(3). The permittee must complete the SSM plan before the compliance date for the source. The permittee must also keep the SSM plan on-site and readily available as long as the source is operational. The SSM plan provides detailed procedures for operating and maintaining your source to minimize emissions during a qualifying SSM event for which the source chooses the 40 CFR 63.2850(e)(2) malfunction period, or the 40 CFR 63.2850(d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. Some or all of the procedures may come from plans developed for other purposes such as a Standard Operating Procedure manual or an Occupational Safety and Health Administration Process Safety Management plan. To qualify as a SSM plan, other such plans must meet all the applicable requirements of these NESHAP.  
[40 CFR 63.2852]
- i. In accordance with US EPA Consent Decree (see Paragraphs 38, 39, and 66), the permittee has committed to a SLR for this emissions unit at this facility of 0.175 gallons VOC per ton.
- j. In accordance with Paragraph 73 of the Consent Decree, compliance with the interim and final VOC SLR limits [in this Consent Decree] shall be determined in accordance with 40 C.F.R. Part 63, Subpart GGGG, with the following exceptions: (1) provisions pertaining to HAP content shall not apply; (2)



monitoring and recordkeeping of solvent losses at each plant shall be conducted daily; (3) solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses; and (4) records shall be kept in the form of the table in Attachment 13 of the Consent Decree, that show total solvent losses, solvent losses during malfunction periods, and adjusted solvent losses (i.e., total solvent losses minus malfunction losses) monthly and on a twelve-month rolling basis.

- k. Malfunctions. In accordance with Paragraph 74 of the Consent Decree, the permittee may apply the provisions of 40 C.F.R. Part 63, Subpart GGGG pertaining to malfunction periods only when the conditions in both subparagraph (i) and (ii) are met: (i) The malfunction results in a total plant shutdown. [For purposes of this Consent Decree,] a "total plant shutdown" means a shutdown of the solvent extraction system. (ii) Cumulative solvent losses during malfunction periods at a plant do not exceed 4000 gallons in a 12-month rolling period. At all other times, the permittee must include all solvent losses when determining compliance with its final VOC SLR limit.
- l. In accordance with Paragraph 75 of the Consent Decree, during a malfunction period, the permittee shall comply with the Startup, Shutdown, Malfunction ("SSM") Plan as required under Subpart GGGG for the plant. The solvent loss corresponding to a malfunction period will be calculated as the difference in the total solvent inventories for the day before the malfunction period began and the day the plant resumes normal operation.
- m. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(1), and e)(1).

c) Operational Restrictions

- (1) The use of photo-chemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.  
[OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records showing the organic compound materials used to be non-photochemically reactive. These records shall be maintained in accordance with the record-keeping requirements specified in the Standard Terms and Conditions of this permit.  
[OAC 3745-77-07(C)(1)]



- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2862(b) - compliance plan and SSM plan retention on-site

63.2862(c) - records for hexane mass balance calculations

63.346(d) - records for calculation of rolling 12-month averages and the 'compliance ratio'

63.2862(e) - records for startup, shutdown, and malfunction events

63.2863 - records retention  
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart GGGG]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.  
[OAC 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2860(c) - significant modification notifications, as applicable

63.2861(a) - annual compliance certification

63.2861(b) - deviation notification report

63.2861(c) - periodic startup, shutdown, and malfunction report

63.2861(d) - immediate startup, shutdown, and malfunction report  
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart GGGG]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

Emission Limitation:  
(SLF) - 0.2 gallon HAP /ton oilseed [See b)(2)a.]

Applicable Compliance Method:  
Compliance shall be based on the requirements specified in b)(2)a through b)(2)c.  
[OAC 3745-77-07(C)(1)]



**Proposed Title V Permit**

ADM-Fostoria

**Permit Number:** P0116868

**Facility ID:** 0332020187

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



**7. P017, DTDC**

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

Soybean meal de-solventizing, toasting, drying, cooling - with 3 process cyclones

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-2231 issued December 4, 1985)	0.24 lb particulate emissions (PE) /hr, 1.05 tons PE /yr (Dryer Deck 1 cyclone)  0.28 lb PE /hr, 1.23 tons PE /yr (Dryer Deck 2 cyclone)  0.59 lb PE /hr, 2.58 tons PE /yr (DTDC cooler cyclone)
b.	OAC rule 3745-17-11(B)	none [See b)(2)a.]
c.	OAC rule 3745-17-07(A)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) None.



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

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible 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) 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.  
[OAC 3745-77-07(C)(1)]

e) **Reporting Requirements**

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from any stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. 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.  
[OAC 3745-77-07(C)(1)]

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 approximately 2.5 years after permit issuance. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.



- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s) for PE: 40 CFR, Part 60, Appendix A, Methods 1 - 5
- d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) 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.

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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

Emission Limitation:

0.24 lb PE /hr, 1.05 tons/yr (Dryer Deck 1 cyclone)

0.28 lb PE /hr, 1.23 tons/yr (Dryer Deck 1 cyclone)

0.59 lb PE /hr, 2.58 tons/yr (DTDC cooler cyclone)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing. [See f)(1) and f)(2)]

Past compliance with the hourly PE limitations was demonstrated by emission testing conducted on July 25, 2002.

The annual allowable PE limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.



**Proposed Title V Permit**  
ADM-Fostoria  
**Permit Number:** P0116868  
**Facility ID:** 0332020187

**Effective Date:** To be entered upon final issuance

[OAC 3745-77-07(C)(1) and PTI 03-2231]

g) Miscellaneous Requirements

(1) None.



8. P018, Fluid Bed Dryer

Operations, Property and/or Equipment Description:

Fluid bed drying, conditioning - with process cyclone, and baghouse

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13224 as modified September 1, 1999)	9.50 lb particulate emissions (PE) /hr, 41.6 tons PE /yr  3.36 lb particulate matter (filterable) less than 10 microns (PM <sub>10</sub> ) /hr, 14.7 tons PM <sub>10</sub> /yr  See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).

b. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclone during operation of this



emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the cyclone on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 1.0 to 6.0 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.  
[OAC 3745-77-07(C)(1) and PTI 03-13224]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the cyclone was outside the acceptable range(s);
  - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC 3745-77-07(C)(1) and PTI 03-13224]

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 3 months after the effective date of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE and PM<sub>10</sub> (for the cyclone exhaust).
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:  
  
PE: 40 CFR, Part 60, Appendix A, Methods 1 - 5  
PM<sub>10</sub>: Method 201 or 201A of 40 CFR 51, Appendix M
- d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) 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.

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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
9.50 lb PE /hr, 41.6 tons PE /yr  
3.36 lb PM<sub>10</sub> /hr, 14.7 tons PM<sub>10</sub> /yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE and PM<sub>10</sub> limitation based on the results of emission testing. [See f)(1) and f)(2)]

Past compliance with the PE and PM<sub>10</sub> limitations was demonstrated by emission testing conducted on January 27, 2000.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-13224]

- b. Emission Limitation:  
20% opacity, as a six-minute average

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1) and PTI 03-13224]

- g) Miscellaneous Requirements

- (1) None.



9. P020, Pellet Cooler

Operations, Property and/or Equipment Description:

Millfeed pellet cooler - with process cyclone

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-9408 issued February 28, 1996)	2.8 lb particulate emissions (PE) /hr, 12.3 tons PE /yr  1.4 lb particulate matter (filterable) less than 10 microns (PM <sub>10</sub> ) /hr, 6.1 tons PM <sub>10</sub> /yr
b.	OAC rule 3745-17-11(B)	none [See b)(2)a.]
c.	OAC rule 3745-17-07(A)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclone during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and



maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the cyclone on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 2.0 to 7.0 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1) and PTI 03-9408]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the cyclone was outside the acceptable range(s);
  - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC 3745-77-07(C)(1) and PTI 03-9408]

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 3 months after the effective date of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE and PM<sub>10</sub>.

- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

PE: 40 CFR, Part 60, Appendix A, Methods 1 - 5

PM<sub>10</sub>: Method 201 or 201A of 40 CFR 51, Appendix M

- d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) 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.



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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

Emission Limitation:

2.8 lb PE /hr, 12.3 tons PE /yr

1.4 lb PM<sub>10</sub> /hr, 6.1 tons PM<sub>10</sub> /yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE and PM<sub>10</sub> limitation based on the results of emission testing. [See f)(1) and f)(2)]

The permittee may also determine compliance with the above emission limitations by multiplying the maximum process weight rate (tons/hr) by emission factors of 0.36 lb of PE /ton and 0.18 lb PM<sub>10</sub> /ton throughput (AP-42 Table 9.9.1-2 [05/98]).

The annual allowable limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation(s) through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 5 for PE, and Method 201 or 201A of 40 CFR 51, Appendix M for PM<sub>10</sub>.  
[OAC 3745-77-07(C)(1) and PTI 03-9408]

- g) Miscellaneous Requirements

- (1) None.



10. P026, Grain Cleaning, Secondary De-hulling

Operations, Property and/or Equipment Description:

Grain Cleaning, Secondary De-hulling - with process baghouse

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	15.3 lbs particulate emissions (PE) /hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 0.5 to 8.0 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.  
[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
  - b. an identification of each incident of deviation described in (a) above where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC 3745-77-07(C)(1)]



f) Testing Requirements

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

a. Emission Limitation:  
15.3 lbs PE /hr

Applicable Compliance Method:

Compliance with the hourly limitation may be determined by multiplying the maximum baghouse outlet concentration of 0.03 gr/dscf by the baghouse's maximum volumetric air flow rate (22,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

[OAC 3745-77-07(C)(1)]

b. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



11. P903, Truck unloading

Operations, Property and/or Equipment Description:

Soybean receiving - truck - with baghouse

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	11.0 lbs particulate emissions (PE) /hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	none [See b)(2)a.]
d.	OAC rule 3745-17-08(B)(1)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

b. The 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)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.



Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.  
[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
  - b. an identification of each incident of deviation described in (a) above where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and



- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
11.0 lbs PE /hr

Applicable Compliance Method:

The permittee shall determine compliance with the above emission limitation by multiplying the maximum process weight rate (tons/hr) by an emission factor of 0.15 lb of PE/ton (AP-42 Table 9.11.1-1 [11/95]) and then multiplying by a control factor of (1 - 0.99).\*

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

\* The control efficiency of the baghouse is assumed to be 99%.

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



**12. P904, Rail unloading**

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

Soybean receiving - Rail, & transfer & conveying

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	none [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	none [See b)(2)b.]
c.	OAC rule 3745-17-07(B)(1)	none [See b)(2)a.]
d.	OAC rule 3745-17-08(B)(1)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

d. The 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)(1).

c) Operational Restrictions

(1) None.



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**Facility ID:** 0332020187

**Effective Date:** To be entered upon final issuance

- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
- e) Reporting Requirements
  - (1) None.
- f) Testing Requirements
  - (1) None.
- g) Miscellaneous Requirements
  - (1) None.



13. Emissions Unit Group -handling, processing group: P021, P022,

EU ID	Operations, Property and/or Equipment Description
P007	Flaking rolls, with aspiration and cyclone
P008	Hull grinding, with aspiration and baghouse
P021	Bean hull separating from meats - with cyclone
P022	Flake conveyor

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	none [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



**Proposed Title V Permit**  
ADM-Fostoria  
**Permit Number:** P0116868  
**Facility ID:** 0332020187

**Effective Date:** To be entered upon final issuance

- f) Testing Requirements
  - (1) None.
- g) Miscellaneous Requirements
  - (1) None.



14. Emissions Unit Group -truck and rail load-out group: P901, P902,

EU ID	Operations, Property and/or Equipment Description
P901	Meal Loadout to Truck with Baghouse
P902	Meal Loadout to Rail with Baghouse

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 operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI P0116683 issued April 21, 2014)	<u>Stack Emissions (from P901 and P902 combined):</u> 2.14 lbs of particulate matter 10 microns of less in size (PM10)/hour;  9.37 tons of PM10/year  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average  <u>Fugitive Emissions (from P901 and P902 combined):</u> 39.94 tons of fugitive PM10/year  Visible fugitive PE shall not exceed 20% opacity, as a three-minute average  See b)(2)a. and b)(2)b.
b.	ORC 3704.03(T)	See b)(2)c. and b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)f.
d.	OAC rule 3745-17-07(B)	See b)(2)g.
e.	OAC rule 3745-17-08(B)	See b)(2)h.



(2) Additional Terms and Conditions

- a. Emissions units P901 and P902 are separate and independent operations which share a common baghouse for control. The use of a common baghouse in this situation results in only one emissions unit being operational at any given time. The physical capacity to only operate one emissions unit at a time is reflected in the operational restriction contained in c)(1). Given the circumstances of shared control and the inability of the emission units to operate simultaneously, the requirements contained in this permit have been established to reflect “combined” requirements for emission units P901 and P902.
- b. This permit establishes the following legally and practically enforceable limitations for the purpose of limiting the potential to emit (PTE):
  - i. 2.14 lbs of PM10/hour from the stack (P901 and P902 combined);
  - ii. 9.37 tons of PM10/year from the stack (P901 and P902 combined);
  - iii. 39.94 tons of fugitive PM10/year (P901 and P902 combined);
  - iv. the use of a baghouse achieving a maximum outlet concentration of 0.01 grain PM10/dscf; and
  - v. visible emission restrictions.

The legally and practically enforceable limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restriction in c)(2).

- c. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be compliance with the voluntary requirement established under OAC rule 3745-31-05(F) to use a baghouse achieving a maximum outlet concentration of 0.01 grain PM10/dscf.
- d. The BAT requirements under ORC 3704.03(T) 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) do not involve an established NAAQS. It should also be noted that fugitive emissions from source are not considered in the determination of Prevention of Significant Deterioration (PSD) applicability.
- e. The emissions shall be vented to a baghouse at all times the emissions unit is in operation.
- f. These emissions units are exempt from the visible emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.



- g. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- h. The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- i. The uncontrolled mass rate of particulate emissions is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

c) **Operational Restrictions**

- (1) The permittee shall not operate emissions units P901 and P902 simultaneously.  
[OAC 3745-77-07(A)(1) and PTI P0116683]
- (2) The following operational restriction is being established for the purpose of establishing the following legally and practically enforceable requirement which limits PTE:
  - a. This emissions unit shall be vented to a baghouse capable of achieving a maximum outlet grain loading concentration of 0.01 gr/dscf.  
[OAC 3745-77-07(A)(1) and PTI P0116683]
- (3) The annual throughput (for emissions unit P901 and P902 combined) of meal loaded into "closed containers" shall not exceed 40,000 tons per year.  
[OAC 3745-77-07(A)(1) and PTI P0116683]
- (4) Emissions units P901 and P902 have the capability of loading meal directly into "trucks" or can load "closed containers" by the use of an additional screw conveyor. The physical maximum throughput for meal loadout for the facility is 2,502,857 tons per year based on the maximum soybean processing capacity of the facility. Meal loading of closed containers generates additional fugitive emissions of particulate matter due to the use of an additional screw conveyor. To limit emissions of particulate matter associated with the loading of closed containers the above throughput restriction is being established.  
[OAC 3745-77-07(A)(1) and PTI P0116683]

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

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 - 8 inches of water while the emissions unit is in operation.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The



monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. The date and time the deviation began;
- b. The magnitude of the deviation at that time;
- c. The date the investigation was conducted;
- d. The name(s) of the personnel who conducted the investigation; and
- e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. A description of the corrective action;
- g. The date the corrective action was completed;
- h. The date and time the deviation ended;
- i. The total period of time (in minutes) during which there was a deviation;
- j. The pressure drop readings immediately after the corrective action was implemented; and
- k. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.



[OAC 3745-77-07(C)(1) and PTI P0116683]

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any fugitive visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible 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) 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.

[OAC 3745-77-07(C)(1) and PTI P0116683]

- (4) The permittee shall maintain monthly records of the amount of meal loaded into closed containers, in tons. For each month, the permittee shall also calculate the annual, year-to-date, meal loaded into closed containers, in tons (cumulative total of each month to date from January to December).

[OAC 3745-77-07(C)(1) and PTI P0116683]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
  - b. an identification of each incident of deviation described in (a) above where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and



- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC 3745-77-07(C)(1) and PTI P0116683]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC 3745-77-07(C)(1) and PTI P0116683]

- (3) The permittee shall submit annual deviation (excursion) reports that identify any of the following, as well as the corrective actions that have been taken to achieve compliance:
  - a. any exceedances of the annual meal throughput limitation contained in c)(3).

If no deviations occurred during the calendar year, the permittee shall submit an annual report which states no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year.

[OAC 3745-77-07(C)(1) and PTI P0116683]

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 approximately 2.5 years after permit issuance [Permit #P0087133 issued 7/15/10; this is a minor permit modification of that permit]. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for  $PM_{10}$ .
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for  $PM_{10}$ : Method 201 or 201A of 40 CFR 51, Appendix M
  - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]



- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) 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.

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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) 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:

**Stack Emissions**

- a. Emission Limitation  
2.14 lbs of PM10/hour; 9.37 tons of PM10/year

Applicable Compliance Method

The hourly emission limitation was established by multiplying the maximum outlet concentration of 0.01 gr/dscf by the maximum volumetric flow rate of 25000 acfm and conversion factors of 60 minutes/hour, and 1 lb/7000 grains. If required, the permittee shall demonstrate compliance by testing in accordance with Method 201 or 201A of 40 CFR Part 51, Appendix M.

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours/year, then dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI P0116683]

- b. Emission Limitation  
Visible PE shall not exceed 5% opacity, as a six-minute average



Applicable Compliance Method

If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC 3745-77-07(C)(1) and PTI P0116683]

**Fugitive Emissions**

c. Emission Limitation

39.94 tons of fugitive PM10/year

Applicable Compliance Method

The annual PM10 limitation was established by the summation of fugitive PM10 from meal loading of trucks and meal loading of closed containers. The emission limitation was determined as follows:

- i. emissions from meal loading of trucks and railcars were determined by applying a 75% capture efficiency for the baghouse control system to fugitive emissions generated from the loading operation. The fugitive emissions from the loading operation were calculated by multiplying a maximum meal loadout throughput of 2,502,857 tons/year, an emission factor of 0.12 lb of PM10/ton\* and a conversion factor of ton/2000 lbs.
- ii. emissions from meal loading of closed containers were determined by multiplying by a maximum meal loadout throughput of 40,000 tons/year, an emission factor of 0.12 lb of PM10/ton, and a conversion factor of ton/2000 lbs.

Therefore, provided compliance is shown with the meal loadout restriction in this permit, compliance with the annual emission limitation shall also be demonstrated.

\*The emission factor of 0.12 lb of PM10/ton was established from the following:

- iii. an emission factor 0.27 lb of particulate matter per ton of soybeans processed from AP-42 Section 9.11.1, Vegetable Oil Processing [11/95]
- iv. a factor of 0.797 tons of meal per ton of soybeans.
- v. a ratio factor of 0.35 lb of PM10/lb PM from Emission Factors for Grain Receiving and Feed Loading Operations at Feed Mills, September 17, 1996.

[OAC 3745-77-07(C)(1) and PTI P0116683]

d. Emission Limitation

Visible fugitive PE shall not exceed 20% opacity, as a three-minute average

Applicable Compliance Method

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for



**Proposed Title V Permit**  
ADM-Fostoria  
**Permit Number:** P0116868  
**Facility ID:** 0332020187

**Effective Date:** To be entered upon final issuance

New Stationary Sources”), and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

[OAC 3745-77-07(C)(1) and PTI P0116683]

g) Miscellaneous Requirements

(1) None.