



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-04433

DATE: 4/1/2004

Cargill Inc.
Adam Schmidt
6761 Kellogg Ave
Cincinnati, OH 45230

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 4/1/2004
Effective Date: 4/1/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-04433

Application Number: 14-04433
APS Premise Number: 1431032444
Permit Fee: **\$625**
Name of Facility: Cargill Inc.
Person to Contact: Adam Schmidt
Address: 6761 Kellogg Ave
Cincinnati, OH 45230

Location of proposed air contaminant source(s) [emissions unit(s)]:
**6761 Kellogg Ave
Cincinnati, Ohio**

Description of proposed emissions unit(s):
F007 - Internal grain handling and storage.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.


Ohio Environmental Protection Agency

Director

Cargill Inc.

PTI Application: 14-04433

Modification Issued: 4/1/2004

Facility ID: 1431032444

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Records Retention Requirements

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.

4. 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

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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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency 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).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

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

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	17.98
PM10	4.64

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F007- Internal grain handling and storage - Modification	OAC rule 3745-31-05(A)(3)	80.7 lbs/hour PM 14.34 TPY PM
		20.9 lbs/hour PM10 3.72 TPY PM10
		See T&C A.2.a., A.2.c and B.1.
	OAC rule 3745-17-08(B)	Exempt per OAC rule 3745-17-08(A)(3)(a).

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from the storage bin vents and any fugitive dust emissions unit, shall not exceed 20% opacity, as a three-minute average, except as specified by rule.
- 2.b The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c The conveying operations shall be enclosed at all times during the transfer of materials.
- 2.d Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations and the opacity limitations.

B. Operational Restrictions

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Cargil

PTI A

Modification Issued: 4/1/2004

Emissions Unit ID: **F007**

1. A mineral oil spray shall be applied to the grain as needed to minimize emissions of fugitive dust.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the identity and total monthly quantity (in tons) of each commodity handled (throughput) or stored.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize the following information:
 - a. the identity and total monthly quantity (in tons) of each commodity received; and
 - b. the identity and total monthly quantity (in tons) of each commodity shipped.

The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation:

14.34 TPY PM; 3.72 TPY PM10

Applicable Compliance Method:

Emissions shall be calculated and compliance determined by using the following equations:

$$\text{tons PM/yr} = [(A) * (E) * 0.0005] + [(B) * (E) * 0.0005 * (1-0.99)]$$

$$\text{tons PM10/yr} = [(C) * (E) * 0.0005] + [(D) * (E) * 0.0005 * (1-0.99)]$$

where,

A = PM emission factor for Storage bin, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).

B = PM emission factor for Headhouse and grain handling, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).

C = PM10 emission factor for Storage bin, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).

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Emissions Unit ID: **F007**

- D = PM10 emission factor for Headhouse and grain handling, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).
- E = Total annual throughput, tons.

b. Emission Limitation:

80.7 lbs/hour PM; 20.9 lbs/hour PM10

Applicable Compliance Method:

Emissions shall be calculated and compliance determined by using the following equations:

$$\text{lbs PM/hr} = [(A) * (E)] + [(B) * (E) * (1-0.99)]$$

$$\text{lbs PM10/hr} = [(C) * (E)] + [(D) * (E) * (1-0.99)]$$

where,

A = PM emission factor for Storage bin, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).

B = PM emission factor for Headhouse and grain handling, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).

C = PM10 emission factor for Storage bin, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).

D = PM10 emission factor for Headhouse and grain handling, pounds per ton of material throughput, from AP-42, Table 9.9.1-1, (March, 2003).

E = Maximum hourly throughput, tons.

2. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following method:

a. Visible Particulate Emission Limitation:

shall not exceed 20% opacity, as a three-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance 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, 2003.

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in Permit To Install 14-04433, as issued on June 10, 1998.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-08(B)
P901 - Truck Unloading with fabric filter	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-11	
	OAC rule 3745-17-07(A)(1)(a)	

Cargil

PTI A

Modification Issued: 4/1/2004

Emissions Unit ID: **P901**

Applicable Emissions
Limitations/Control Measures

Stack:

0.64 lb/hr PM

0.16 TPY PM

0.16 lb/hr PM10

0.04 TPY PM10

Fugitive:

3.36 lbs/hr PM

0.84 TPY PM

0.84 lb/hr PM10

0.21 TPY PM10

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

See T&C A.2.a, A.2.c, B.1 and B.3.

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

See T&C A.2.b.

Exempt per OAC rule 3745-17-08(A)(3)(a).

2. Additional Terms and Conditions

- 2.a** Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average, except as specified by rule.
- 2.b** Visible particulate emissions from the fabric filter exhaust stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
- 2.c** Particulate emissions from the truck unloading operation (P901), shall be vented to a fabric filter having a control efficiency of at least 99%, by weight.
- 2.d** The hourly emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, the use of a fabric filter and the opacity limitations.

B. Operational Restrictions

- 1. The truck unloading building shall have a roof, be enclosed on two sides, have an electric door on the entrance side, and have a drop curtain on the exit side.
- 2. The pressure drop across the fabric filter shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.
- 3. A mineral oil spray shall be applied to the grain as needed to minimize emissions of fugitive dust.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit are in operation. 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 across the fabric filter on a daily basis.
- 2. This facility shall maintain monthly records which list the following:
 - a. the identity and total monthly quantity (in tons) of each commodity received.

D. Reporting Requirements

1. This facility shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize the following information:
 - a. the identity and total monthly quantity (in tons) of each commodity received through P901, truck unloading operations.

The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term B.2.

These reports shall be submitted to the Hamilton County Department of Environmental Services within thirty days following the excursion.

3. The permittee shall submit semi-annual summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

E. Testing Requirements

1. Compliance with the visible emissions limitations in terms A.2.a. and A.2.b. shall be demonstrated by the methods outlined in 40 CFR 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
2. Compliance with the annual fugitive PM emission limitation (TPY) shall be demonstrated by the following calculation:

$$\text{TPY} = 0.06 \text{ lb PM/ton of product} \times \text{Tons of product/year} \times [1 - 0.95 (\text{capture eff. fraction})] / 2000.$$

3. Compliance with the annual PM emission limitation (TPY) associated with the fabric filter exhaust stack shall be demonstrated by the following calculation:

$$\text{TPY emissions} = \text{Lb PM/ton of product} \times \text{Tons of product/year} \times [0.95 (\text{capture efficiency fraction})] \times [1 - 0.99 (\text{control efficiency fraction})] \times 1 / 2000.$$

F. Miscellaneous Requirements

Cargil

PTI A

Modification Issued: 4/1/2004

Emissions Unit ID: **P901**

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in Permit To Install 14-04433, as issued on June 10, 1998.

Cargil

PTI A

Modification Issued: 4/1/2004

Emissions Unit ID: P904

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P904 - Barge Loading with fabric filter	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11	
	OAC rule 3745-17-07(A)(1)	

Cargil**PTI A****Modification Issued: 4/1/2004**Emissions Unit ID: **P904**

Applicable Emissions
Limitations/Control Measures

Stack:

1.7 lbs/hr PM

0.42 TPY PM

0.43 lb/hr PM10

0.11 TPY PM10

Fugitive:

8.96 lbs/hr PM

2.22 TPY PM

2.24 lbs/hr PM10

0.56 TPY PM10

See T&C A.2.a, A.2.b, B.1, B.2
and B.4.

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

The emission limitations specified
by this rule are less stringent than
the emission limitations established
pursuant to OAC rule
3745-31-05(A)(3).

Exempt per OAC rule
3745-17-08(A)(3)(a).

2. Additional Terms and Conditions

- 2.a** Visible particulate emissions of fugitive dust, shall not exceed 20% opacity, as a three-minute average, except as specified by rule.

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- 2.b** Visible particulate emissions from the fabric filter exhaust stack shall not exceed 0% opacity, as a six-minute average, except as specified by rule.
- 2.c** The hourly emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, the use of a fabric filter and the opacity limitations.

B. Operational Restrictions

- 1. Capture points for the barge conveyor drop and telescoping spout discharge shall be vented to a fabric filter having a control efficiency of at least 99%.
- 2. Barge unloading stations shall operate as follows:

The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.

- 3. The pressure drop across the fabric filter shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.
- 4. A mineral oil spray shall be applied to the grain as needed to minimize emissions of fugitive dust.

C. Monitoring and/or Recordkeeping Requirements

- 1. This facility shall maintain monthly records which list the following:
 - a. the identity and total monthly quantity (in tons) of each commodity shipped.
- 2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 across the fabric filter on a daily basis.

D. Reporting Requirements

1. This facility shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize the following information:

- a. the identity and total monthly quantity (in tons) of each commodity shipped.

The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in term B.3.

These reports shall be submitted to the Hamilton County Department of Environmental Services within thirty days following the excursion.

3. The permittee shall submit semi-annual summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the baghouse was in operation.

E. Testing Requirements

1. Compliance with the visible particulate emission limitations in this permit shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
2. Compliance with the annual fugitive PM emission limitation (TPY) shall be demonstrated by the following calculation:

$$\text{TPY} = 0.16 \text{ lb PM/ton of product} \times \text{Tons of product/year} \times (1 - 0.95 \text{ capture eff. fraction}) / 2000$$

3. Compliance with the annual PM emission limitation (TPY) associated with the fabric filter exhaust stack shall be demonstrated by the following calculation:

$$\text{TPY} = \text{Lb PM/ton of product (taken from PTI application)} \times \text{Tons of product/year} \times [0.95 \text{ (capture efficiency)}] \times (1 - 0.99 \text{ control eff.}) / 2000.$$

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in Permit To Install 14-04433, as issued on June 10,

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Cargil

PTI A

Modification Issued: 4/1/2004

Emissions Unit ID: **P904**

1998.