Ohio Environmental Protection Agency

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

7/17/2015

Certified Mail

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

Michael Lake
Valley Grain Co. - a Division of Mennel Milling
128 W.Crocker Street
Fostoria, OH 44830

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0671000131
Permit Number: P0116354
Permit Type: Renewal
County: Ross

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Valley Grain Co. - a Division of Mennel Milling

Facility ID:	0671000131
Permit Number:	P0116354
Permit Type:	Renewal
Issued:	7/17/2015
Effective:	7/17/2015
Expiration:	7/17/2025

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Valley Grain Co. - a Division of Mennel Milling

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

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

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. P901, Truck Unloading 11
2. F002, Column Grain Dryer 17
3. F003, Railcar Loading 20
4. P001, Grain Handling, Feed Mixing 24

Authorization

Facility ID:	0671000131
Application Number(s):	A0050138
Permit Number:	P0116354
Permit Description:	PTIO renewal for bulk grain load out system
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	7/17/2015
Effective Date:	7/17/2015
Expiration Date:	7/17/2025

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Valley Grain Co. - a Division of Mennel Milling
4 Railroad Street
Kingston, OH 45644

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0116354
Permit Description: PTIO renewal for bulk grain load out system

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

Emissions Unit ID:	**F002**
Company Equipment ID:	Column Grain Dryer
Superseded Permit Number:	06-05986
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F003**
Company Equipment ID:	Railcar Loading
Superseded Permit Number:	06-06807
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P001**
Company Equipment ID:	GRAIN HANDLING, FEED MIXING
Superseded Permit Number:	P0040669
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P901**
Company Equipment ID:	Truck Unloading
Superseded Permit Number:	06-4108
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P901, Truck Unloading

Operations, Property and/or Equipment Description:

Truck unloading with a maximum of 967,840 tons per year of grain into two in-ground receiving pits controlled by cyclone with a capture efficiency of 99% and a control efficiency of 95%. Grain transfer by totally enclosed screw, drag, and belt conveyors, and totally enclosed elevator legs.(Formerly permitted as F001)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (as established in PTI 06-4108 issued 6/24/1994)	Particulate emissions (PE) from the cyclone stack shall not exceed 0.28 lbs/hr. Total PEfrom the stack and fugitive combined shall not exceed 1.49 tons/year. Visible emissions of fugitive dust shall not exceed 5% opacity from truck unloading station. Visible emissions of fugitive dust shall not exceed 0% opacity from grain handling operations.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Best available control measures that are sufficient to minimize or eliminate visible emission of fugitive dust. See b)(2)a. through b)(2)d.
b.	OAC rule 3745-17-07(A)(1)	Visible PEfrom any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided in the rule.
c.	OAC rule 3745-17-11	This emission limitation is less stringent than the emission limitation established under OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. Truck unloading

ii. Grain Transfer and Conveying

b. The permittee shall employ best available control measures from the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

Material Handing Operation(s)	Control Measure(s)
Truck Unloading	Enclosed building with an electric door vented to a R-72 cyclone.
Grain Transfer and Conveying	Totally enclosed screw, drag, and conveyers.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

Material Handling Operation(s)	Minimum Inspection Frequency
Truck Unloading	Daily - while in use
Grain Transfer and Conveying	Daily – while in use

The above-mentioned inspections shall be performed during representative, normal operating conditions.

(2) The permittee shall maintain records of the following information:

a. The date and reason any required inspection was not preformed;

b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s):

c. The dates the control measure(s) was (were) implemented; and

d. On a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in (2)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and visible emissions from the truck unloading 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE from the cyclone stack shall not exceed 0.28 lb/hr.

Applicable Compliance Methods:

The emission limitation was established by the following calculation:

(851,472 tons/year)(0.059 lbs/ton)(0.99)(0.05) = 2,486.7 lbs/year ÷ 8,760 hrs/yr

= 0.28 lb/hr emitted from stack

Where:

851,472 tons/year = maximum throughput established by permittee's application

0.059 lbs/ton = emission factor from AP-42 Section 9.9.1 Table 9.9.1-1, 3/03

0.99 = capture efficiency % established by permittee's application

0.05 = (1-control efficiency %) established by permittee's application

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

Total PE from the stack and fugitive combined shall not exceed 1.49 tons/year.

Applicable Compliance Method:

The emissions limitation was established by the following calculations:

Grain Receiving Fugitive Emissions

Straight Truck

(851,472 tons/year)(0.059 lbs/ton)(0.99)(0.05) = 2,486.7 lbs/year ÷ 2,000 lbs/ton = 1.24 ton/year emitted from stack

(851,472 tons/year)(0.059 lbs/ton)(0.01) = 502.4 lbs/year ÷ 2,000 lbs/ton

=0.25 ton/year fugitive emissions from process

Total PE from stack and fugitive = 1.49 ton/year

Where:

851,472 tons/year = maximum throughput established by permittee's application

0.059 lbs/ton = emission factor from AP-42 Section 9.9.1 Table 9.9.1-1, 3/03

0.99 = capture efficiency % established by permittee's application

0.01 = (1-capture efficiency %) established by permittee's application

0.05 = (1-control efficiency %) established by permittee's application

*These calculations are based on worst case scenario situations. Hopper trucks are also operated independent of the straight truck operations and their potential to emit is 0.46 ton/year. This means that hopper trucks will always be below the limit of 1.49 tons/year established above.

c. Emissions Limitation:

Visible emissions of fugitive dust shall not exceed 5% opacity from truck at unloading station.

Applicable Compliance Methods:

If required, visible PE shall be determined according to USEPA Method 9.

d. Emissions Limitation:

Visible emissions of fugitive dust shall not exceed 0% opacity from grain handling operations.

Applicable Compliance Methods:

If required, visible PE shall be determined according to USEPA Method 9.

e. Emissions Limitation:

Visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

(1) None.

2. F002, Column Grain Dryer

Operations, Property and/or Equipment Description:

90 TPH VT3026 Zimmerman Column Grain Dryer equipped with a 16.1 mmBtu per hour propane fired burner controlled by 0.094 inch perforated enclosure sheets with a capture efficiency of 99% and a control efficiency 95% for particulate emissions with a maximum yearly throughput of 788,400 tons per year.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (as established in PTI 06-5986 issued 2/16/2000)	Nitrogen oxides (NOx) emissions shall not exceed 0.56 lb/hr and 2.47 tons/year. Total fugitive PE shall not exceed 1.18 tons/year. See c)(1) through c)(2)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas or LPG in this emissions unit.

(2) Fugitive PE from the column dryer shall be controlled by the enclosure of the dryer with perforated sheets in which the perforations do not exceed 0.094 inches.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) For each day during which the permittee does not use a 0.094 inch perforated enclosure sheet, the permittee shall maintain a record of the day and how long the column dryer is in operation.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(3) The permittee shall submit deviation (excursion) reports that identify each day this emissions unit operates without the use of a 0.094 inch perforated enclosure sheet. Each report shall be submitted within 30 days after the deviation occurs.

(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

NOx emissions shall not exceed 0.56 lb/hr and 2.47 tons/year.

Applicable Compliance Method:

The hourly emission limitation was established by the following calculation:

(380,765 gal/year)(13.0 lbs/10^3 gal) = 4,949.9 lbs/yr ÷ 8,760 hrs/yr

= 0.56 lb/hr of NOx

Where:

380,765 gallons/year = Activity rate (the amount processed)

13.0 lbs/10^3 gal = emission factor from AP-42 Section 1.5 Table 1.5-1, 7/08

If required, NO_Xemissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emission limitation was established by the following calculation:

(380,765 gal/year)(13.0 lbs/10^3 gal) = 4949.9 lbs/yr ÷ 2,000 lbs/ton

= 2.47 tons/year of NOx

Where:

380,765 gallons/year = Activity rate (the amount processed)

13.0 lbs/10^3 gal = emission factor from AP-42 Section 1.5 Table 1.5-1, 7/08

b. Emissions Limitations:

Total fugitive PE shall not exceed 1.18 tons/year.

Applicable Compliance Method:

The emissions limitation established by the following calculations:

<u>Grain Drying Fugitive Emissions</u>

(788,400 tons/year)(0.06 lbs/ton)(0.05) = 2,365.2 lbs/year÷2000 lbs/ton

= 1.18 tons/year

Where:

788,400 tons/year = maximum throughput established by permittee's application

0.06 lbs/ton = emission factor from AP 42 Section 9.9.1 Table 9.9.1-1, 3/03

0.05 = (1-capture efficiency %) established by permittee's application

g) Miscellaneous Requirements

(1) None.

3. F003, Railcar Loading

Operations, Property and/or Equipment Description:

Grain transfer and railcar loading with a maximum throughput of 851,472 tons per year along with truck loading with a maximum throughput of 1,419,120 tons per year individually operated and controlled by a retractable spout loader with a capture and control efficiency of 90%. All equipment is totally enclosed.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(as established in PTI 06-06807 issued 3/12/2002)	Fugitive particulate emissions (PE) shall not exceed 2.15 tons/year. Best available control measures that are sufficient to minimize or eliminate visible emission of fugitive dust. See b)(2)a. through b)(2)d.

(2) Additional Terms and Conditions

a. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. All conveyors and transfer points from silos

ii. Railcar loading

b. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned application requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

Material Handling Operation(s)	Control Measure(s)
All conveyors and transfer points from silos	maintain the total enclosure around each transfer point
Railcar loading	maintain the telescoping spouts that raise and lower into the railcars

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient ti satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

Material Handling Operations(s)	Minimum Inspection Frequency
Conveyors from grain transfer from silos to railcar loading	Daily-when in use

The above-mentioned inspections shall be performed during representative, normal operating conditions.

The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned inspection frequencies if operating

experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

(2) The permittee shall maintain records of the following information:

a. The date and reason any required inspection was not preformed;

b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);

c. The dates the control measure(s) was (were) implemented; and

d. On a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in (2)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Fugitive PEshall not exceed 2.15 tons/year.

Applicable Compliance Method:

The emission limitation was established by the following calculations:

Railcars

(851,472 tons/year)(0.0022lbs/ton)(0.10) =187.32 lbs/year ÷ 2,000lbs/ton=

0.09 ton/year for railcars

Trucks

(1,419,120 tons/year)(0.029 lbs/ton)(0.10) =4,115.45 lbs/year ÷ 2,000lbs/ton=

2.06 tons/year for trucks

Total

2.15 tons/year

Where

851,472 tons/year = the maximum amount of grain shipped using railcars; established by permittee's application

1,419,120 tons/year = the maximum amount of grain shipped using trucks; established by permittee's application

0.027lbs/ton = emission factor from AP-42 Section 9.9.1 Table 9.9.1-1, 3/03

0.086 lbs/ton = emission factor from AP-42 Section 9.9.1 Table 9.9.1-1, 3/03

0.10 = (1-capture efficiency %) established by permittee's application

g) Miscellaneous Requirements

(1) None.

4. P001, Grain Handling, Feed Mixing

Operations, Property and/or Equipment Description:

Varying grain handling operations not associated with truck unloading and railcar loading including conveyors, bucket elevators, and storage bins with an annual throughput of 2,838,340 tons/year controlled by being totally enclosed with bin vent screens that have a capture efficiency of 100% and a control efficiency of 99.99%. (Formerly F004)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), (as established on 11/30/01	Total particulate emissions (PE)from bin vents shall not exceed 0.0002 lbs/hr and 0.0009 tons/year. Best available control measures that are sufficient to minimize or eliminate visible emission of fugitive dust. See b)(2)a. through b)(2)d.
b.	OAC rule 3745-17-07(A)(1)	Visible PEfrom any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided in the rule.
b.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC 3745-17-07(A)(1).

(2) Additional Terms and Conditions

a. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. Bucket elevator

ii. Conveyers

iii. Silos

iv. Varying mechanical conveying equipment (not associated with P901 and F003)

b. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned application requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

Material Handling Operation(s)	Control Measure(s)
Bucket elevator	maintain the total enclosure around each transfer point
Conveyers	maintain the total enclosure around conveying equipment
Silos	maintain the total enclosure and be equipped with bin vents
Varying mechanical conveying equipment (not associated with P901 and F003)	maintain the total enclosure around conveying equipment

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient ti satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

Material Handling Operation(s)	Minimum Inspection Frequency
Bucket elevator	daily
Conveyors	daily
Silos	daily
Varying mechanical conveyor equipment (not associated with P901 and F003)	daily

The above-mentioned inspections shall be performed during representative, normal operating conditions.

(2) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s):

c. the dates the control measure(s) was (were) implemented; and

d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(2)d. shall be kept separately for each material handling/prosessing operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE shall not exceed 0.0002 lbs/hr and 0.0009 tons/year.

Applicable Compliance Method:

The emission limitation was established by the following calculations:

Grain Storage

(2,838,240 tons/year)(0.0063lbs/ton)(0.0001) = 1.79 lbs/year

Conveying/Transfer

(2,838,240 tons/year)(0.034lbs/ton)(0.0) = 0.0 lbs/year

Total

1.79 lbs/year + 0.0 lbs/year =1.79 lbs/year ÷ 8,760 hrs/year =

0.0002 lb/hr

1.79 lbs/year ÷ 2,000 lbs/ton =

0.0009 ton/year

Where

2,838,240 tons/year = the total amount of grain stored and conveyed/transferred; as established by permittee's application

0.0063lbs/ton = emission factor from AP-42 Section 9.9.1 Table 9.9.1-1, 3/03

0.034lbs/ton = emission factor from AP-42 Section 9.9.1 Table 9.9.1-1, 3/03

0.0001 = (1-control efficiency %) established by permittee's application

0.0 = (1-capture efficiency %) established by permittee's application

b. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

(1) None.