



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

1/19/2016

Mr. Richard Clark
 Trupointe, New Bremen Feed
 215 Looney Road
 Piqua, OH 45336

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 |

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0306000190
 Permit Number: P0119942
 Permit Type: Initial Installation
 County: Auglaize

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



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Trupointe, New Bremen Feed**

| | |
|----------------|----------------------|
| Facility ID: | 0306000190 |
| Permit Number: | P0119942 |
| Permit Type: | Initial Installation |
| Issued: | 1/19/2016 |
| Effective: | 1/19/2016 |
| Expiration: | 1/19/2026 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
Trupointe, New Bremen Feed

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Final Permit-to-Install and Operate
Trupointe, New Bremen Feed
Permit Number: P0119942
Facility ID: 0306000190
Effective Date: 1/19/2016

Authorization

Facility ID: 0306000190
Application Number(s): A0054862
Permit Number: P0119942
Permit Description: Grain Feed Elevator operations that includes grain receiving, grain loading, a roller mill/granulator and associated parking areas
Permit Type: Initial Installation
Permit Fee: \$3,700.00
Issue Date: 1/19/2016
Effective Date: 1/19/2016
Expiration Date: 1/19/2026
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Trupointe, New Bremen Feed
435 S HERMAN ST
New Bremen, OH 45869

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

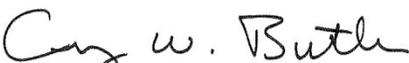
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
Trupointe, New Bremen Feed
Permit Number: P0119942
Facility ID: 0306000190
Effective Date: 1/19/2016

Authorization (continued)

Permit Number: P0119942

Permit Description: Grain Feed Elevator operations that includes grain receiving, grain loading, a roller mill/granulator and associated parking areas

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

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | F001 |
| Company Equipment ID: | F001 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F002 |
| Company Equipment ID: | F002 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P002 |
| Company Equipment ID: | P002 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P901 |
| Company Equipment ID: | P901 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
Trupointe, New Bremen Feed
Permit Number: P0119942
Facility ID: 0306000190
Effective Date: 1/19/2016

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
Trupointe, New Bremen Feed
Permit Number: P0119942
Facility ID: 0306000190
Effective Date: 1/19/2016

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Trupointe, New Bremen Feed

Permit Number: P0119942

Facility ID: 0306000190

Effective Date: 1/19/2016

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
Trupointe, New Bremen Feed
Permit Number: P0119942
Facility ID: 0306000190
Effective Date: 1/19/2016

C. Emissions Unit Terms and Conditions

1. F001, F001

Operations, Property and/or Equipment Description:

Unpaved driveways and parking area

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) | 1.59 tons fugitive particulate emissions (PE)/yr No visible fugitive PE except for a period of time not to exceed three (3) minutes during any 60-minute observation period from unpaved roadways and parking areas See b)(2)a. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)b. through b)(2)g.] |
| b. | OAC rule 3745-17-07(B) | See b)(2)h. |
| c. | OAC rule 3745-17-08(B) | See b)(2)i. |

(2) Additional Terms and Conditions

- a. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways: all unpaved road segments

unpaved parking areas: all unpaved parking areas.

- b. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by surface improvements, good housekeeping and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. Any unpaved roadway or parking area, which during the term of this permit is paved or takes on the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- e. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- f. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

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.

- (3) The permittee shall also identify in the PER forms the following information concerning inspection requirements during the 12-month reporting period for this emissions unit:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

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. Emission Limitation:

1.59 tons fugitive PE/yr

Applicable Compliance Method:

The annual emission limitation was established by multiplying AP-42 emission factor of 8.21 lbs PE/VMT for unpaved roadways [Section 13.2.2 (12/03)], by the maximum annual vehicle miles traveled (VMT) of 3875 miles and taking into account 90% control efficiency for BAT measures (1-0.90), then dividing the sum total by 2000 lbs/ton.

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

No visible fugitive PE except for a period of time not to exceed 3 minutes during any 60-minute observation period from unpaved roadways and parking areas

Applicable Compliance Method:

If required, compliance with the visible fugitive PE emission limitation specified above shall be determined in accordance with Test Method 22 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, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.



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Permit Number: P0119942
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Effective Date: 1/19/2016

g) Miscellaneous Requirements

- (1) None.

2. F002, F002

Operations, Property and/or Equipment Description:

Truck Loading/loadout bins

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) | 3.19 tons fugitive particulate matter less than ten microns in size (PM ₁₀)/year Visible particulate emissions (PE) of fugitive dust shall not exceed 20% opacity, as a three-minute average See b)(2)a. |
| b. | OAC rule 3745-17-07(B) | See b)(2)b. |
| c. | OAC rule 3745-17-08(B) | See b)(2)c. |

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for this emissions unit have been determined to be:

i. the use of a two-sided structure.

BAT requirements also include compliance with the terms and conditions of this permit.

- 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. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 108,000 tons of grain.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of grain throughput for this emissions unit (in tons per month and total tons, to date for the calendar year).
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the truck loading operations. 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 and location 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 abnormal visible emissions.
- (3) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The 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 Northwest District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northwest District Office 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.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the truck loading operations; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.19 tons fugitive PM₁₀/yr

Applicable Compliance Method:
The emission limitation was established by multiplying an AP-42 emission factor of 0.059 lb PM₁₀/ton grain (Section 9.9.1 (3/2003)) by a maximum annual grain throughput of 108,000 tons and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the maximum annual grain throughput, compliance with the annual emission limitation shall also be demonstrated.
 - b. Emission Limitation:
Visible PE of fugitive dust shall not exceed 20% opacity, as a three-minute average



Final Permit-to-Install and Operate
Trupointe, New Bremen Feed
Permit Number: P0119942
Facility ID: 0306000190
Effective Date: 1/19/2016

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- g) Miscellaneous Requirements
 - (1) None.

3. P002, P002

Operations, Property and/or Equipment Description:

Roller Mill/Granulator/Crumbler

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) | 0.76 lb of particulate matter less than ten microns in size (PM ₁₀)/hour and 1.84 tons of PM ₁₀ /year Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average from the cyclone stack serving this emissions unit See b)(2)a. |
| b. | OAC rule 3745-17-07(B) | See b)(2)b. |
| c. | OAC rule 3745-17-08(A) | See b)(2)c. |

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements have been determined to be compliance with the terms and conditions of this permit and the following:

- i. use of a cyclone cleaner that achieves 80% control efficiency; and
 - ii. total enclosure of this emissions unit.
 - b. This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
 - c. 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).
- c) Operational Restrictions
 - (1) The maximum annual throughput for this emissions unit shall not exceed 108,000 tons of grain.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the amount of grain throughput for this emission unit, in tons per month, and total tons, to date for the calendar year.
 - (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to minimize or eliminate the 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 Northwest District Office.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northwest District Office 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.
 - (3) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(1):
 - a. all days during which any visible particulate emissions were observed from the stack serving the baghouse; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

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

f) Testing Requirements

(1) Compliance with the 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:

0.76 lb of PM₁₀/hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying an emission factor of 0.034 lb of PM₁₀/ton (AP-42 Table 9.9.1-1 [3/03]) by a maximum hourly throughput of 22.4 tons. Therefore provided compliance with the maximum hourly grain throughput is not exceeded, compliance with the hourly emission limitation shall be demonstrated.

b. Emissions Limitation:

1.84 tons of PM₁₀/year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying an emission factor of 0.034 lb of PM₁₀/ton (AP-42 Table 9.9.1-1 [3/03]) by the maximum annual throughput of 108,000 tons and dividing by 2000 lbs/ton. Therefore provided compliance with the annual grain throughput restriction is shown, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average from the cyclone stack serving this emissions unit

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

4. P901, P901

Operations, Property and/or Equipment Description:

Inside and outside dump pits

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 |
|--|-------------------------------|---|
| | OAC rule 3745-31-05(A)(3) | <p><u>Grain Receiving Stack Emissions</u> 1.62 tons particulate emissions (PE)/year from grain receiving inside dump pit operations</p> <p>Visible PE shall not exceed 10% opacity, as a six-minute average from the cyclone stack serving grain receiving inside dump pit</p> <p><u>Grain Receiving Fugitive Emissions:</u> 1.62 tons fugitive PE/yr from grain receiving outside dump pit operations</p> <p>Visible PE of fugitive dust shall not exceed 20% opacity, as a three-minute average from grain receiving outside dump pit operations See b)(2)a.</p> |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| b. | OAC rule 3745-17-07(B) | See b)(2)b. |
| c. | OAC rule 3745-17-08(B) | See b)(2)c. |

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements have been determined to be a compliance with the terms and conditions of this permit and the following:
 - i. use of a cyclone control on grain receiving operations inside dump pit;
 - ii. use of total enclosure for transferring and conveying operations; and
 - iii. compliance with the terms and conditions of this permit.
- b. This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. 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).

c) Operational Restrictions

- (1) The permittee shall not exceed the following throughputs for individual elevator operations:
 - a. the maximum annual throughput for truck receiving inside dump pit operations shall not exceed 90,000 tons of grain; and
 - b. the maximum annual throughput for truck receiving outside dump pit operations shall not exceed 18,000 tons grain per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of material throughput for each of the following individual operations for this emission unit, in tons per month, and total tons, to date for the calendar year:
 - a. throughput for truck receiving inside dump pit; and
 - b. throughput for truck receiving outside dump pit.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e, grain receiving and transferring and conveying) serving this emissions units. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (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 cyclone stack serving truck receiving inside dump pit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to minimize or eliminate the 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 Northwest District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northwest District Office 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.
- (3) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(2) and d)(3):
 - a. for grain receiving outside dump pit and transferring/conveying operations:

- i. all days during which any visible fugitive particulate emissions were observed (identify the specific operation that experienced visible emissions) from the above operations as specified in d)(2); and
 - ii. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
- b. cyclone stack serving truck receiving inside dump pit:
- i. all days during which any visible particulate emissions were observed from the stack serving the grain receiving inside dump pit operations; and
 - ii. any corrective actions taken to eliminate the visible particulate emissions.

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

f) Testing Requirements

- (1) Compliance with the 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:

1.62 tons PE/yr from grain receiving inside dump pit operations

Applicable Compliance Method:

The annual emission limitation was developed by multiplying an AP-42 emission factor of 0.18 lb PE/ton grain [Section 9.9.1 (3/2003)] by a maximum annual grain throughput of 90,000 tons, then dividing by 2000 lbs/ton and applying an 80% control efficiency for the cyclone. Therefore, provided compliance is shown with the annual grain throughput restriction and the use of a cyclone, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitations:

Visible PE shall not exceed 10% opacity, as a six-minute average from the cyclone stack serving grain receiving inside dump pit

Applicable Compliance Method:

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



c. Emissions Limitation:

1.62 tons fugitive PE/yr from grain receiving outside dump pit operations

Applicable Compliance Method:

The annual emission limitation was developed by multiplying an AP-42 emission factor of 0.18 lb PE/ton grain [Section 9.9.1 (3/2003)] by a maximum annual grain throughput of 18,000 tons, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput restriction, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a three-minute average from the grain receiving outside dump pit operations

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.