



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

2/26/2016

Certified Mail

Keith Higgins
ADM-Fostoria
608 Findlay RD.
Fostoria, OH 44830

Facility ID: 0332020187
Permit Number: P0118363
County: Hancock

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 1/12/2016. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

Cc: Ohio EPA DAPC, Northwest District Office



Response to Comments

Facility ID:	0332020187
Facility Name:	ADM-Fostoria
Facility Description:	Soybean Oil Mill
Facility Address:	608 Findlay Road Fostoria, OH 44830 Hancock County
Permit:	P0118363, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Courier on 01/23/2016. The comment period ended on 02/22/2016.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None – No comments were received

- a. Comment: None
- b. Response: None



PRELIMINARY PROPOSED

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

Facility ID:	0332020187
Permit Number:	P0118363
Permit Type:	Renewal
Issued:	2/26/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



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

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Authorization

Facility ID: 0332020187
Facility Description: Soybean Oil Mill
Application Number(s): A0051426, A0054520
Permit Number: P0118363
Permit Description: Renewal Title V operating permit for a Soybean Oil Mill.
Permit Type: Renewal
Issue Date: 2/26/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0116868

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

ADM-Fostoria
608 Findlay Road
Fostoria, OH 44830

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Preliminary Proposed Title V Permit

ADM-Fostoria

Permit Number: P0118363

Facility ID: 0332020187

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

5. Title IV Provisions

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

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

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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



10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.



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

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

14. Permit Shield

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

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

15. Operational Flexibility

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

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



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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



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

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

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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

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



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

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

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

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

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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



30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Preliminary Proposed Title V Permit

ADM-Fostoria

Permit Number: P0118363

Facility ID: 0332020187

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
F006	Pellet Load-out Tanks (PTI 03-13053)
L001	Cold Cleaner Parts Washer
T003	North Hexane Storage
T004	South Hexane Storage

[OAC rule 3745-77-07(A)(13)]



Preliminary Proposed Title V Permit

ADM-Fostoria

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C. Emissions Unit Terms and Conditions



1. B004, #2 Boiler

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)(a) (PTI P0105829 issued February 9, 2010)	0.37 lb nitrogen oxides (NO _x) /mmBtu of actual heat input 0.084 lb carbon monoxide (CO) /mmBtu of actual heat input 0.11 lb particulate emissions (PE) /mmBtu of actual heat input (when firing No. 6 fuel oil or biofuel) 0.10 lb particulate matter (filterable) 10 microns or less (PM ₁₀) /mmBtu of actual heat input (when firing No. 6 fuel oil or biofuel) 0.0079 lb PM ₁₀ (filterable) /mmBtu of actual heat input (when firing No. 2 fuel oil or natural gas) See b)(2)b and b)(2)c.
b.	OAC rule 3745-31-05(D) (PTI P0105829 issued February 9, 2010)	39.0 tons NO _x per rolling, 12-month period [See b)(2)a.] 39.0 tons SO ₂ per rolling, 12-month period [See b)(2)a.] 24.9 tons of PE per rolling 12-month period [See b)(2)a.] 9.9 tons of PM ₁₀ per rolling 12-month period [See b)(2)a.]



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE) /mmBtu of actual heat input (when firing natural gas and/or No. 2 fuel oil) [See b)(2)c.]
d.	OAC rule 3745-17-10 (C)(2)	See b)(2)d.
e.	OAC rule 3745-18-06(D)	1.6 lb sulfur dioxide (SO ₂) /mmBtu of actual heat input
f.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
g.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480-7575) [In accordance with 63.7575, this emissions unit is an existing large boiler located at a major source of HAP emissions and subject to the applicable requirements specified in this section.]	See b)(2)e., c)(5) and c)(6) 63.7500(a) Table 3 requirements
h.	40 CFR 63.1-15 [40 CFR 63.7575 Table 10 of Subpart DDDDD]	Table 10 in Section 63.7575 of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. This permit establishes the federally enforceable emission limitations in b)(1)b for purposes of establishing the emissions unit as a minor modification for attainment New Source Review. The emission limitations are based on fuel usage restrictions [see c)(3)] for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability.
- b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-18-06(D), and 3745-31-05(D).
- c. The emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a) defers to the emissions limitation specified by OAC 3745-17-10 (B)(1).
- d. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).
- e. This emissions unit is designed to burn gas 1 fuels (subcategory) and therefore is not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler is



subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart and must have a one-time energy assessment, performed in accordance with Table 3 #4 of the subpart.

- i. The initial tune-up and one-time energy assessment must be completed no later than 1/31/16.
 - ii. The one-time energy assessment must be performed by a qualified energy assessor and must include the following:
 - (a) a visual inspection of the boiler system;
 - (b) an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (c) an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;
 - (d) a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - (e) a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
 - (f) a list of cost-effective energy conservation measures that are within the permittee's control;
 - (g) a list of the energy savings potential of the energy conservation measures identified; and
 - (h) a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.
- c) Operational Restrictions
- (1) The permittee shall only burn natural gas, fuel oil number 2, fuel oil number 6, or biofuel in this emissions unit.

[OAC 3745-77-07(A)(1) and PTI P0105829]
 - (2) The fuel oil number 2 combusted in this emissions unit shall only be fuel oil number 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils".

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



- (3) The fuel oil number 6 combusted in this emissions unit shall only be fuel oil number 6, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils" and shall meet the following requirements: the fuel oil number 6 shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission standard specified in OAC 3745-18-06(D).

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

- (4) The maximum rolling, 12-month quantity of fuel burned in this emissions unit shall be limited by the following equation. The criteria of the limiting equation must be met for NO_x, SO₂, PE, and PM₁₀ (meaning the calculated results for NO_x, SO₂, PE, and PM₁₀ must not exceed 39.0, 39.0, 24.9, and 9.9 tons, respectively).

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

where:

M = the increment of the rolling 12-month period;

n = the increment of the fuel usage input during the period;

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

C_n = emission factor for the individual fuel:

- 0.20 lb NO_x /mmBtu (biofuel)
- 0.10 lb NO_x /mmcf of natural gas
- 0.15 lb NO_x /mmBtu (fuel oil number 2)
- 0.37 lb NO_x /mmBtu (fuel oil number 6)

- 0.0015 lb SO₂ /mmBtu (biofuel)
- 0.6 lb SO₂ /mmcf of natural gas
- 142(S*) lbs SO₂ /1000 gallons of fuel oil number 2
- 157(S*) lbs SO₂ /1000 gallons of fuel oil number 6

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

- 1.9 lbs PM₁₀ (filterable) /mmcf of natural gas
- 14.3*** lbs PM₁₀ (filterable) /1000 gallons of fuel oil number 6
- 1.1 lbs PM₁₀ (filterable) /1000 gallons of fuel oil number 2
- 0.07 lbs PM₁₀ (filterable) /mmBtu (biofuel)****

* S = sulfur content, weight percent



** This emissions factor will be acceptable as a 'worst-case' for PE, based on a fuel oil sulfur content at the SO₂ emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula: $9.19(S)+3.22$, Table 1.3-1.

*** This emissions factor will be acceptable as a 'worst-case' for PM₁₀, based on a fuel oil sulfur content at the SO₂ emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula: $7.17 [1.12(S) + 0.37]$, Table 1.3-5.

**** For biofuel, the 'total' PE (filterable) emissions factor shall be used as a conservative emissions factor for PM₁₀ (filterable), due to lack of particle size distribution information being available.

EMT = emission thresholds:

39.0 tons for NO_x; 39.0 tons for SO₂; 24.9 tons for PE; 9.9 tons of PM₁₀

Emission factors other than those indicated above may be used with prior approval from the Ohio EPA, Northwest District Office.

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

- (5) The permittee must have a tune-up and inspection completed annually (no more than 13 months after the previous tune-up and inspection) in accordance with the requirements of 40 CFR 63.7540(a)(10) and Table 3 #3 of Subpart DDDDD.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]

- (6) The boiler and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]

d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) The permittee shall maintain monthly records of the type and quantity of fuel burned in these emissions units.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]



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

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

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

- (4) In lieu of d)(3) for No. 2 oil, the permittee may keep records of fuel oil supplier certification, which shall include the following information:
- a. The name of the oil supplier.
 - b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.
 - c. The sulfur content of the oil.

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

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that



no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

- (6) The permittee shall maintain monthly records of the following information:
- a. the quantity of each individual fuel burned (natural gas in mmcf, oils in gallons);
 - b. the rolling 12-month summation of the usage rates for each individual fuel burned (natural gas in mmcf, oils in gallons);
 - c. the total NO_x emissions from each fuel burned, calculated as follows:
$$E_N = (U_n)(C_n) \text{ (1ton /2000 lbs) where:}$$
$$E_N = \text{NO}_x \text{ emissions from an individual fuel burned, in tons}$$
$$U_n = \text{total heat input (mmBtu) of the individual fuel - natural gas, fuel oil number 2, fuel oil number 6, biofuel}$$
$$C_n = \text{emission factor for the individual fuel in lbs NO}_x/\text{mmBtu}$$
 - d. The total NO_x emission rate of all fuels burned, in tons/month, calculated as follows:
$$EM_N = E_1 + E_2 + E_3 + \dots + E_n \text{ where:}$$
$$EM_N = \text{Monthly NO}_x \text{ emissions, in tons/month}$$
$$E_n = \text{NO}_x \text{ emissions from each individual fuel burned, in tons [from d)(5)c]}$$
 - e. The rolling 12-month NO_x emission rate of all fuels burned, calculated as follows:
$$ET_N = EM1 + EM2 + EM3 + \dots + EM12 \text{ where:}$$
$$ET_N = \text{Annual NO}_x \text{ emissions (tons) as summed from the previous 12 months of monthly NO}_x \text{ emissions;}$$
$$EM = \text{Monthly NO}_x \text{ emissions (tons/month)}$$
 - f. The total SO₂ emissions from each fuel burned, calculated as follows:
$$E_S = (U_n)(C_n) \text{ (1ton /2000 lbs) where:}$$
$$E_S = \text{SO}_2 \text{ emissions from an individual fuel burned, in tons}$$
$$U_n = \text{for natural gas and vegetable oil, the total heat input (mmBtu) of each individual fuel;}$$



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

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

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

EM_S = Monthly SO_2 emissions, in tons/month

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

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

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

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

EM = Monthly SO_2 emissions (tons/month)

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

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

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

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

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

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

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

EM_P = Monthly PE emissions, in tons/month

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

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

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

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

EM = Monthly PE emissions (tons/month)



- l. The total PM₁₀ emissions from each fuel burned, calculated as follows:

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

$$E_{P1} = \text{PM}_{10} \text{ emissions from an individual fuel burned, in tons}$$

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

C_n = emission factor for the individual fuel in lbs PM₁₀ /mmBtu (for natural gas and biofuel) or lbs PM₁₀ /1000 gal (for fuel oil number 2 and fuel oil number 6)

- m. The total PM₁₀ emission rate of all fuels burned, in tons/month, calculated as follows:

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

$$EM_{P1} = \text{Monthly PM}_{10} \text{ emissions, in tons/month}$$

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

- n. The rolling 12-month PM₁₀ emission rate of all fuels burned, calculated as follows:

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

ET_{P1} = Annual PM₁₀ emissions (tons) as summed from the previous 12 months of monthly PM₁₀ emissions;

$$EM = \text{Monthly PM}_{10} \text{ emissions (tons/month)}$$

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

- (7) The permittee shall maintain records of the following information for the boiler(s) in order to meet the record keeping requirements of 40 CFR 63.7525, 40 CFR 63.7555, 40 CFR 63.10(b) and (c), and to demonstrate compliance with the Subpart DDDDD:

a. a copy of each notification and report that is submitted to comply with Part 63 Subpart DDDDD, including all documentation supporting the Initial Notification and all subsequent Notifications of Compliance Status and/or semiannual compliance reports;

b. records of performance test, fuel analysis, or other compliance demonstrations and as required by 63.10(b)(2)(viii);

c. if burning an alternative fuel in a boiler designed to burn gas 1 (subcategory) fuels, i.e., fuels other than natural gas, refinery gas, or gaseous fuels subject to another subpart or part of the CFR, the records of:

i. the total hours per calendar year that the alternative fuel was burned; and



- ii. the total hours per calendar year that the boiler operated during periods of gas curtailment or gas supply emergencies.

These records shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

- (8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0105829, issued on 02/09/2010: **d)(5)**. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, fuel oil number 2, fuel oil number 6, and/or biofuel was combusted in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.

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

- (2) The permittee shall submit semiannual written reports that identify the following when burning #6 fuel oil:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month SO₂ limitation specified in b)(1)b;
 - b. the rolling, 12-month NO_x limitation specified in b)(1)b;
 - c. the rolling, 12-month PE limitation specified in b)(1)b;



- d. the rolling, 12-month PM₁₀ limitation specified in b)(1)b);
- e. the fuel usage restrictions, based on the calculations specified in c)(4), for summing the NO_x, SO₂, PE, and PM₁₀, rolling 12-month emissions; and
- f. the use of fuel oil which did not meet the requirements specified in c)(2) or c)(3);

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

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

- (4) The permittee shall submit, to the appropriate Ohio EPA District Office or Local Air Agency, the following notifications in accordance with the applicable requirements of 40 CFR 63.7545, 40 CFR 63.7(b) and (c), 40 CFR 63.8(e) and (f)(4) and (6), and 40 CFR 63.9(b) through (h):

- a. The Notification of Compliance Status must contain the following:
 - i. A description of the facility boilers including:
 - (a) identification of the subcategory each boiler is in;
 - (b) the design heat input capacity of the/each unit;
 - (c) a description of the add-on controls used on each boiler;
 - (d) description of the fuel(s) burned,
 - (e) identification of fuel(s) that were determined to be a non-waste or fuel(s) processed from discarded non-hazardous secondary materials under 40 CFR 241.3; and
 - (f) the justification for the selection of fuel(s) burned during the compliance demonstration.
 - b. the following certification(s) of compliance, as applicable, must be signed by a responsible official:
 - i. certification that the facility has complied with the required initial tune-up in accordance with 40 CFR 63.7540(a)(10)(i) through (vi);
 - ii. for existing units, certification that the facility has completed a one-time energy assessment performed according to 40 CFR 63.7530(e) and that it is an accurate depiction of the facility at the time of the assessment; and
 - iii. except for boilers burning natural gas, refinery gas, or other gas 1 fuel, certification that no secondary materials that are solid waste were combusted in any affected unit;



- c. if the unit is designed to burn natural gas, refinery gas, or other gas 1 fuels, and there are plans to use an alternative fuel during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, a notification of alternative fuel use must be submitted within 48 hours of the declaration of each period of natural gas curtailment or supply interruption. The notification must include the following information:
 - i. facility name and address;
 - ii. identification of the affected unit(s);
 - iii. the reason natural gas or equivalent fuel cannot be used;
 - iv. the date when the natural gas curtailment was declared or the natural gas supply interruption began;
 - v. the type of alternative fuel to be used; and
 - vi. the dates when the alternative fuel use is expected to begin and end.

- d. if there are any plans to switch fuels or make a physical change to a boiler, and this fuel switch or change to the boiler may result in the applicability of a different subcategory, notification of the switch must be made at least 30 days prior to the date of the switch or change and this notification must identify:
 - i. the name of the facility, the location of the source, the boiler(s) that will switch fuels or were physically changed;
 - ii. the applicable subcategory of the boiler(s) before and after the switch;
 - iii. the date on which the fuel switch or physical change occurred;
 - iv. the planned date for the fuel to be switched; and
 - v. the date of the notice.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0105829, issued on 02/09/10: **[e)(2)]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]



f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 60 days after the next use of this boiler under this permit, for use of any fuel(s) at such time, excluding isolated non-production firing such as maintenance checks, operational test-firing, etc. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO_x and CO.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

NO_x: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A
CO: Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A
 - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
 - f. Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).

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



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

a. Emission Limitation:

0.37 lb NO_x /mmBtu of actual heat input

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb NO_x /mmBtu emission standard by multiplying the maximum hourly fuel oil* combustion rate (460 gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 55 pounds NO_x /1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (69 mmBtu/hr).

* worst-case fuel, for this emissions unit

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 4 and 7 of 40 CFR, Part 60, Appendix A.

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

b. Emission Limitation:

0.084 lb CO /mmBtu of actual heat input

Applicable Compliance Method:

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

* worst-case fuel, for this emissions unit

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 4 and 10 of 40 CFR, Part 60, Appendix A.

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

c. Emission Limitation:

1.6 pounds SO₂ /mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated in accordance with the recordkeeping and calculations specified in d)(3) and d)(4) as applicable.



If required, the permittee shall demonstrate compliance with the SO₂ emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

When firing natural gas or biofuel, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

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

d. Emission Limitation:

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

Applicable Compliance Method:

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

* 16.5 lbs of PE /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98] 9.19x1.45+3.22)

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 5 of 40 CFR, Part 60, Appendix A.

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

e. Emission Limitation:

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

Applicable Compliance Method:

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

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

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



f. Emission Limitation:

0.10 pound PM₁₀ (filterable) /mmBtu of actual heat input (when firing No. 6 fuel oil or biofuel)

Applicable Compliance Method:

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

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

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

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

g. Emission Limitation:

0.0079 lb PM₁₀ (filterable) /mmBtu of actual heat input (when firing natural gas and/or No. 2 fuel oil)

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum fuel firing capacity of the emissions unit (493 gallons/hour, for No. 2) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 fuel oil (1.1* lbs PM₁₀ /1000 gallons), and then dividing by the emissions unit's maximum heat input capacity (69 mmBtu/hr).

* PM₁₀ (filterable) from burning fuel oil number 2 is based on 55% of PE (0.55 fraction based on AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-7 [9/98])

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

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

h. Emission Limitations:

39.0 tons of NO_x per rolling, 12-month period
39.0 tons of SO₂ per rolling, 12-month period
24.9 tons of PE per rolling 12-month period
9.9 tons of PM₁₀ per rolling, 12-month period



Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through record keeping requirements in d)(6).

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

i. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements

(1) None.



2. B005, #3 Boiler

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)(a) (PTI P0105828 issued December 28, 2009)	<u>Short-term emission limits for natural gas:</u> 0.20 lb of particulate matter (filterable) 10 microns or less (PM ₁₀) /hr 7.51 lbs of nitrogen oxide (NO _x) /hr 1.15 lbs of organic compounds (OC) /hr 8.76 lbs of carbon monoxide (CO) /hr <u>Short-term emission limits for oil(s):</u> 175 lbs of SO ₂ /hr; 20.9 lbs of NO _x /hr; 3.75 lbs of CO /hr 11.5 lbs of particulate emissions (PE) /hr when burning No. 6 oil or biofuel; 1.50 lbs of PE /hr when burning No. 2 oil 9.94 lbs of PM ₁₀ (filterable) /hour when burning No. 6 oil or biofuel; 0.83 lbs of PM ₁₀ (filterable) /hour when burning No. 2 oil



Preliminary Proposed Title V Permit

ADM-Fostoria

Permit Number: P0118363

Facility ID: 0332020187

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>Long-term emission limits for CO and OC (based on worst-case fuel):</u></p> <p>38.4 tons of CO/year;</p> <p>5.04 tons of OC/year</p> <p>See b)(2)d.</p>
b.	OAC rule 3745-31-05(D)	<p>39.4 tons of NO_x per rolling 12-month period.</p> <p>39.3 tons of SO₂ per rolling 12-month period.</p> <p>24.9 tons of PE per rolling 12-month period.</p> <p>9.74 tons of PM₁₀ per rolling 12-month period.</p> <p>See b)(2)a.</p>
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
d.	40 CFR 60.40c et seq. (NSPS Subpart Db)	See b)(2)b.
e.	OAC rule 3745-17-10 (B)(1)	See b)(2)c.
f.	OAC rule 3745-17-10(C)(2)	See b)(2)c.
g.	OAC rule 3745-18-06(D)	See b)(2)c.
h.	<p>40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480-7575)</p> <p>[In accordance with 63.7575, this emissions unit is an existing large boiler located at a major source of HAP emissions and subject to the applicable requirements specified in this section.]</p>	<p>See b)(2)e., c)(5) and c)(6)</p> <p>63.7500(a) Table 3 requirements</p>
i.	<p>40 CFR 63.1-15 [40 CFR 63.7575 Table 10 of Subpart DDDDD]</p>	<p>Table 10 in Section 63.7575 of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply.</p>



(2) Additional Terms and Conditions

- a. Annual emissions shall not exceed the following, based upon a rolling, 12-month summation of the monthly emissions:
 - i. 39.4 tons of NO_x
 - ii. 39.3 tons of SO₂
 - iii. 24.9 tons of PE
 - iv. 9.74 tons of PM₁₀

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

- b. 40 CFR Part 60, Subpart Db, is not applicable to this emissions unit to due to the fact that construction, modification, or reconstruction of the unit occurred prior to June 19, 1984 (at a different facility).
- c. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).
- d. The requirements of OAC rule 3745-31-05(A)(3)(a) also include compliance with the requirements of OAC rule 3745-31-05(D).
- e. This emissions unit is designed to burn gas 1 fuels (subcategory) and therefore are not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler is subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart and must have a one-time energy assessment, performed in accordance with Table 3 #4 of the subpart.
 - i. The initial tune-up and one-time energy assessment must be completed no later than 1/31/16.
 - ii. The one-time energy assessment must be performed by a qualified energy assessor and must include the following:
 - (a) a visual inspection of the boiler system;
 - (b) an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (c) an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;
 - (d) a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;



- (e) a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
- (f) a list of cost-effective energy conservation measures that are within the permittee's control;
- (g) a list of the energy savings potential of the energy conservation measures identified; and
- (h) a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas, fuel oil number 2, fuel oil number 6, or biofuel in this emissions unit.

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

- (2) The fuel oil number 2 combusted in this emissions unit shall only be fuel oil number 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils". The sulfur content of the fuel oil number 2 shall contain no more than 0.5 weight percent sulfur.

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

- (3) The fuel oil number 6 combusted in this emissions unit shall only be fuel oil number 6, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils" and shall meet the following requirements: the fuel oil number 6 shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission standard specified in OAC 3745-18-06(D).

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

The maximum rolling, 12-month quantity of fuel burned in this emissions unit shall be limited by the following equation. The criteria of the limiting equation must be met for NO_x, SO₂, PE, and PM₁₀ (meaning the calculated results for NO_x, SO₂, PE, and PM₁₀ must not exceed 39.4, 39.3, and 9.74 tons, respectively).

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

where:

M = the increment of the rolling 12-month period;

n = the increment of the fuel usage input during the period;



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

C_n = emission factor for the individual fuel:

0.20 lb NO_x /mmBtu (biofuel)
0.072 lb NO_x /mmcf of natural gas
0.118 lb NO_x /mmBtu (fuel oil number 2 and fuel oil number 6)

0.0015 lb SO_2 /mmBtu (biofuel)
0.6 lb SO_2 /mmcf of natural gas
157(S*) lbs SO_2 /1000 gallons of fuel oil number 6
142(S*) lbs SO_2 /1000 gallons of fuel oil number 2

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

1.9 lbs PM_{10} (filterable) /mmcf of natural gas
14.3*** lbs PM_{10} (filterable) /1000 gallons of fuel oil number 6
1.1 lbs PM_{10} (filterable) /1000 gallons of fuel oil number 2
0.07 lbs PM_{10} (filterable) /mmBtu (biofuel)****

* S = sulfur content, weight percent

** This emissions factor will be acceptable as a 'worst-case' for PE, based on a fuel oil sulfur content at the SO_2 emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula: $9.19(S)+3.22$, Table 1.3-1.

*** This emissions factor will be acceptable as a 'worst-case' for PM_{10} , based on a fuel oil sulfur content at the SO_2 emissions standard of OAC 3745-18-06(D) [at typical density and heat content]. In the case of fuel oil sulfur content less than permit limitation, an emission factor less than specified here will be allowed, based on the AP-42 formula: $7.17 [1.12(S) + 0.37]$, Table 1.3-5.

**** For biofuel, the 'total' PE (filterable) emissions factor shall be used as a conservative emissions factor for PM_{10} (filterable), due to the lack of particle size distribution information being available.

EMT = emissions threshold:

39.4 tons for NO_x ; 39.3 tons for SO_2 ; 24.9 tons for PE; 9.74 tons for PM_{10}

Emission factors other than those indicated above may be used with prior approval from the Ohio EPA, Northwest District Office.

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



- (4) The permittee must have a tune-up and inspection completed annually (no more than 13 months after the previous tune-up and inspection) in accordance with the requirements of 40 CFR 63.7540(a)(10) and Table 3 #3 of Subpart DDDDD.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]

- (5) The boiler and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]

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

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

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

- (2) The permittee shall maintain monthly records of the type and quantity of fuel burned in these emissions units.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

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

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

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

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

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



- c. The sulfur content of the oil.

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

- (5) When burning # 6 fuel oil, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

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

- (6) The permittee shall maintain monthly records of the following information:
 - a. the quantity of each individual fuel burned (natural gas in mmcf, oils in gallons);
 - b. the rolling 12-month summation of the usage rates for each individual fuel burned (natural gas in mmcf, oils in gallons);
 - c. the total NO_x emissions from each fuel burned, calculated as follows:

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

E_N = NO_x emissions from an individual fuel burned, in tons

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

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

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



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

EM_N = Monthly NO_x emissions, in tons/month

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

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

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

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

EM = Monthly NO_x emissions (tons/month)

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

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

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

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

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

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

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

EM_S = Monthly SO_2 emissions, in tons/month

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

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

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

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

EM = Monthly SO_2 emissions (tons/month)

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

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

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



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

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

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

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

EM_P = Monthly PE emissions, in tons/month

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

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

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

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

EM = Monthly PE emissions (tons/month)

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

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

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

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

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

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

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

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

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

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

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

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



EM = Monthly PM₁₀ emissions (tons/month)

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

- (7) The permittee shall maintain records of the following information for the boiler(s) in order to meet the record keeping requirements of 40 CFR 63.7525, 40 CFR 63.7555, 40 CFR 63.10(b) and (c), and to demonstrate compliance with the Subpart DDDDD:
- a. a copy of each notification and report that is submitted to comply with Part 63 Subpart DDDDD, including all documentation supporting the Initial Notification and all subsequent Notifications of Compliance Status and/or semiannual compliance reports;
 - b. records of performance test, fuel analysis, or other compliance demonstrations and as required by 63.10(b)(2)(viii);
 - c. if burning an alternative fuel in a boiler designed to burn gas 1 (subcategory) fuels, i.e., fuels other than natural gas, refinery gas, or gaseous fuels subject to another subpart or part of the CFR, the records of:
 - i. the total hours per calendar year that the alternative fuel was burned; and
 - ii. the total hours per calendar year that the boiler operated during periods of gas curtailment or gas supply emergencies.

These records shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

- (8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0105828, issued on 12/28/2009: **d)(5)**. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, fuel oil number 2, fuel oil number 6, and/or biofuel was combusted in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.

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



- (2) The permittee shall submit semiannual written reports that identify the following when burning #6 fuel oil:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the rolling, 12-month SO₂ limitation specified in b)(1)b;
 - b. the rolling, 12-month NO_x limitation specified in b)(1)b;
 - c. the rolling, 12-month PE limitation specified in b)(1)b;
 - d. the rolling, 12-month PM₁₀ limitation specified in b)(1)b;
 - e. the fuel usage restrictions, based on the calculations specified in c)(4), for summing the NO_x, SO₂, PE, and PM₁₀, rolling 12-month emissions; and
 - f. the sulfur content restriction for fuel oil number 2 or fuel oil number 6;
 - g. the use of fuel oil number 2 which did not meet the requirement specified in c)(2); and
 - h. the use of fuel oil number 6 which did not meet the requirement specified in c)(3).

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

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

- (4) The permittee shall submit, to the appropriate Ohio EPA District Office or Local Air Agency, the following notifications in accordance with the applicable requirements of 40 CFR 63.7545, 40 CFR 63.7(b) and (c), 40 CFR 63.8(e) and (f)(4) and (6), and 40 CFR 63.9(b) through (h):
- a. The Notification of Compliance Status must contain the following:
 - i. A description of the facility boilers including:
 - (a) identification of the subcategory each boiler is in;



- (b) the design heat input capacity of the/each unit;
 - (c) a description of the add-on controls used on each boiler;
 - (d) description of the fuel(s) burned,
 - (e) identification of fuel(s) that were determined to be a non-waste or fuel(s) processed from discarded non-hazardous secondary materials under 40 CFR 241.3; and
 - (f) the justification for the selection of fuel(s) burned during the compliance demonstration.
- b. the following certification(s) of compliance, as applicable, must be signed by a responsible official:
- i. certification that the facility has complied with the required initial tune-up in accordance with 40 CFR 63.7540(a)(10)(i) through (vi);
 - ii. for existing units, certification that the facility has completed a one-time energy assessment performed according to 40 CFR 63.7530(e) and that it is an accurate depiction of the facility at the time of the assessment; and
 - iii. except for boilers burning natural gas, refinery gas, or other gas 1 fuel, certification that no secondary materials that are solid waste were combusted in any affected unit;
- c. if the unit is designed to burn natural gas, refinery gas, or other gas 1 fuels, and there are plans to use an alternative fuel during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, a notification of alternative fuel use must be submitted within 48 hours of the declaration of each period of natural gas curtailment or supply interruption. The notification must include the following information:
- i. facility name and address;
 - ii. identification of the affected unit(s);
 - iii. the reason natural gas or equivalent fuel cannot be used;
 - iv. the date when the natural gas curtailment was declared or the natural gas supply interruption began;
 - v. the type of alternative fuel to be used; and
 - vi. the dates when the alternative fuel use is expected to begin and end.
- d. if there are any plans to switch fuels or make a physical change to a boiler, and this fuel switch or change to the boiler may result in the applicability of a different subcategory, notification of the switch must be made at least 30 days prior to the date of the switch or change and this notification must identify:



- i. the name of the facility, the location of the source, the boiler(s) that will switch fuels or were physically changed;
- ii. the applicable subcategory of the boiler(s) before and after the switch;
- iii. the date on which the fuel switch or physical change occurred;
- iv. the planned date for the fuel to be switched; and
- v. the date of the notice.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0105828, issued on 12/28/09: **[e)(2)]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. Fuel oil and/or biofuel: The emissions testing shall be conducted within 60 days after beginning any use of these fuels under this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO_x and CO.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
NO_x: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A
CO: Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A
 - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval



prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

- f. Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).

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

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

- a. Emission Limitations: (Short-term emission limits for burning natural gas)

7.51 lbs of NO_x /hr
8.76 lbs of CO /hr
1.15 lbs of OC /hr
0.20 lb of PM₁₀ /hr

Applicable Compliance Method:

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

NO_x: 0.072 lb of NO_x /MMBTU (manufacturer's guaranteed specification)

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

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

PM₁₀: 1.9 lbs of PM₁₀ (filterable) /mmcf (AP-42 Section 1.4, Natural Gas Combustion, Table 1.4-2 [7/98]) Note: For natural gas, all PE is PM₁₀.

Compliance with the NO_x and CO limitations was demonstrated by emission testing conducted on September 22, 2005. If required, the permittee shall further demonstrate compliance with the emission limitations through emission tests performed in accordance with:

NO_x: Methods 1- 4, and 7 of 40 CFR 60, Appendix A



CO: Methods 1- 4, and 10 of 40 CFR 60, Appendix A
PM₁₀: Method 201 or 201A of 40 CFR 51, Appendix M
OC: Methods 1 through 4 and 18, 25, or 25a of 40 CFR 60, Appendix A.

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

b. Emission Limitations:

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

175 lbs of SO₂ /hr
20.9 lbs of NO_x /hr
3.75 lbs of CO /hr
11.5 lbs of PE /hr when burning fuel oil number 6 or biofuel
1.50 lbs of PE /hr when burning fuel oil number 2
9.94 lbs of PM₁₀ /hr when burning fuel oil number 6 or biofuel
0.83 lbs of PM₁₀ /hr when burning fuel oil number 2

Applicable Compliance Method:

The hourly emission limitations are based on the following:

SO₂: 157 lbs of SO₂ /1000 gallons x S* (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98])

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

NO_x is based on a maximum biofuel (vegetable oil) usage rate of 824 gallons per hour, a heat content of 126550 Btu/gallon, and an emission factor of 0.20 lb of NO_x/mmBtu (manufacturer's guaranteed specification)

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

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

PE: 16.5 lbs of PE /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98] 9.19x1.45+3.22)

PM₁₀ (from burning fuel oil number 6 or biofuel) is based on a maximum number 6 fuel oil usage rate of 695 gallons per hour and the following emission factors:

PM₁₀: 14.3 lbs of PE /1000 gallons (AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-1 [9/98] 7.17 [1.12(1.45) + 0.37])

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



PM₁₀ (filterable) from burning fuel oil number 2 is based on 55% of PE (0.55 fraction based on AP-42 Section 1.3, Fuel Oil Combustion, Table 1.3-7 [9/98])

Compliance with the NO_x, CO, and PM₁₀ limitations has been demonstrated by emission testing conducted on September 22, 2005. If required, the permittee shall further demonstrate compliance with the emission limitations through emission tests performed in accordance with:

NO_x: Methods 1- 4, and 7 of 40 CFR 60, Appendix A

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

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

PM₁₀: Method 201 or 201A of 40 CFR 51, Appendix M

SO₂: Methods 1- 4, and 6 of 40 CFR 60, Appendix A

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

c. Emission Limitations:

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

38.4 tons of CO/year

5.04 tons of OC/year

Applicable Compliance Method:

The annual emission limitations for CO and OC are based the combustion of natural gas which represents a "worst case scenario" for these pollutants. The annual limitations were established by multiplying the maximum hourly emission rates by an operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitations for CO and OC when burning natural gas, compliance with the annual limitations will be assumed.

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

d. Emission Limitations:

39.4 tons of NO_x per rolling 12-month period

39.3 tons of SO₂ per rolling 12-month period

24.9 tons of PE per rolling 12-month period

9.74 tons of PM₁₀ per rolling 12-month period

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated through recordkeeping requirements in d)(6).

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



e. Emission Limitation:

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

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.



3. F007, Column Dryer

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	40 CFR 60.300 et seq. (NSPS Subpart DD)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) (PTI 03-3219 issued July 28, 1999)	107 tons fugitive particulate emissions (PE)/year 26.8 tons fugitive particulate matter less than 10 microns (PM ₁₀)/year 3.62 pounds fugitive nitrogen oxides (NO _x)/hour, 11.8 tons NO _x /year 3.04 pounds fugitive carbon monoxide (CO)/hour, 9.88 tons CO/year Visible fugitive PE shall not exceed 20 percent opacity as a 3-minute average. See b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	none [See b)(2)c.]
d.	OAC rule 3745-17-08(B)(1)	none [See b)(2)d.]

(2) Additional Terms and Conditions

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

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



- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- d. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

c) **Operational Restrictions**

- (1) This emissions unit shall not operate more than 6500 hours per year.

[OAC 3745-77-07(A)(1) and PTI 03-3219]

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

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

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

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

- (2) The permittee shall maintain monthly records of the number of hours of operation for this emissions unit in: hours per month; and total hours, to date, for the calendar year.

[OAC 3745-77-07(C)(1) and PTI 03-3219]



e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

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

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

[OAC 3745-77-07(C)(1) and PTI 03-3219]

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:

107 tons PE/year

Applicable Compliance Method:

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

[OAC 3745-77-07(C)(1) and PTI 03-3219]

b. Emission Limitation:

26.8 tons PM₁₀/year



Applicable Compliance Method:

Compliance with annual allowable PM₁₀ emission limitation shall be determined by multiplying the emission factor of 0.055 pound PM₁₀/ton (AP-42, Table 9.9.1 (revised 5/98) by the annual number of hours the emissions unit was in operation (this is calculated by summing the 12 monthly numbers of hours the emissions unit was in operation [from d)(2)] for the calendar year), and then multiplying by the maximum hourly production rate (tons/hour).

[OAC 3745-77-07(C)(1) and PTI 03-3219]

c. Emission Limitations:

3.62 pounds fugitive NO_x/hour, 11.8 tons NO_x/year

Applicable Compliance Method:

Compliance with the hourly allowable NO_x emission limitation may be determined by multiplying the natural gas emission factor of 100 pounds NO_x/mm cu. ft (AP-42, Table 1.4-1 (revised 3/98) by the maximum natural gas combustion rate (mm cu. ft/hr).

The annual allowable NO_x limitation was developed by multiplying the hourly limitation by 6500, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation and the annual operational hours limit is shown, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-3219]

d. Emission Limitations:

3.04 pounds fugitive CO/hour, 9.88 tons CO/year

Applicable Compliance Method:

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

The annual allowable CO limitation was developed by multiplying the hourly limitation by 6500, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation and the annual operational hours limit is shown, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-3219]



e. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC 3745-77-07(C)(1) and PTI 03-3219]

g) **Miscellaneous Requirements**

- (1) The Permit to Install (PTI) for this emissions unit allowed the permittee to replace an existing rack dryer with a new column dryer. Increases in facility allowable emissions as a result of the replacement equate to 39.75 tons of PE per year and 9.94 tons of PM₁₀ per year.

[PTI 03-3219]



4. F008, Rail to Truck Meal

Operations, Property and/or Equipment Description:

Rail Meal Receiving with Truck Loadout

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

(2) Additional Terms and Conditions

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

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

c. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).



c) Operational Restrictions

- (1) The maximum annual quantity of meal received shall not exceed 30,000 tons.

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

d) Monitoring and/or Recordkeeping Requirements

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

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

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

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

- (2) The permittee shall maintain monthly records of the amount of meal received for this emissions unit in: tons per month; and total tons, to date, for the calendar year.

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

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.



These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) The permittee shall submit annual reports of the quantity of meal received for this emissions unit.

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

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

f) Testing Requirements

- (1) Compliance with the 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:

8.10 tons of fugitive PE/year

Applicable Compliance Method:

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

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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



Preliminary Proposed Title V Permit

ADM-Fostoria

Permit Number: P0118363

Facility ID: 0332020187

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



5. P011, Meal Grinders

Operations, Property and/or Equipment Description:

Meal sifting and grinding - with process baghouse

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 3745-17-11(B)	24.7 lbs particulate emissions (PE) /hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:



- i. the date and time the deviation began and the magnitude of the deviation at that time;
 - ii. the date(s) the investigation was conducted;
 - iii. the names of the personnel who conducted the investigation; and
 - iv. the findings and recommendations.
- c. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary
- i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary:
 - (a) the reason corrective action was not necessary; and
 - (b) the date and time the deviation ended.
 - ii. The permittee shall maintain records of the following information for each deviation when corrective action was taken:
 - (a) a description of the corrective action;
 - (b) the date it was completed;
 - (c) the date and time the deviation ended;
 - (d) the total period of time (in minutes) during which there was a deviation;
 - (e) the pressure drop and scrubber water flow rate immediately after the corrective action; and
 - (f) the name(s) of the personnel who performed the work.
 - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
- d. The acceptable range for the pressure drop across the baghouse is 0.5 to 5.0 inches of water.
- e. This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this



emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

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

e) Reporting Requirements

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

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

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

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:
24.7 lbs PE /hr

Applicable Compliance Method:

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

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

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



b. Emission Limitation:

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

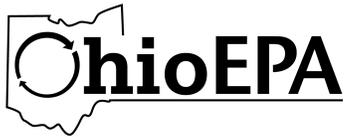
Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.



6. P013, Extraction

Operations, Property and/or Equipment Description:

Oil Extraction

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	40 CFR, Part 63, Subpart GGGG [40 CFR 63.2830 - 63.2872] In accordance with 40 CFR 63.2832 and 63.2833, this emissions unit is a component of an existing affected source consisting of a vegetable oil production process that is subject to the emission limitations/control measures specified in this section.	See 40 CFR 63.2840 [Table 1 (ix)] Solvent Loss Factor (SLF) - 0.2 gallon Hazardous Air Pollutant (HAP) /ton oilseed See b)(2)a. through b)(2)l.
b.	40 CFR 63.1-15 [40 CFR 63.2870 Table 1 of Subpart GGGG]	Table 1 in Section 63.2870 of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGG shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-21-07(M)	See b)(2)m.

(2) Additional Terms and Conditions

a. HAP loss requirements:

i. The emission requirements limit the number of gallons of HAP lost per ton of listed oilseeds processed. For each operating month, the permittee must calculate a compliance ratio which compares the actual HAP loss to the allowable HAP loss for the previous 12 operating months as shown in Equation 1 of this section. An operating month, as defined in 40 CFR 63.2872, is any calendar month in which a source processes a listed oilseed, excluding any entire calendar month in which the source



operated under an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2). Equation 1 of this section follows:

Compliance Ratio = Actual HAP Loss / Allowable HAP Loss

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

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

Where:

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

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

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

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

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

[40 CFR 63.2840(a)]

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



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



source must meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(d)]

- g. Existing or new sources experiencing a malfunction: A malfunction is defined in 40 CFR 63.2. In general, it means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or process equipment to function in a usual manner. If an existing or new source experiences an unscheduled shutdown as a result of a malfunction, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, then the permittee must meet the requirements associated with one of two compliance options. Routine or scheduled process startups and shutdowns resulting from, but not limited to, market demands, maintenance activities, and switching types of oilseed processed, are not startups or shutdowns resulting from a malfunction and, therefore, do not qualify for this provision. Within 15 days of the beginning date of the malfunction, the permittee must choose to comply with one of the options listed in b)(2)g.i. or b)(2)g.ii. as follows:

- i. Normal operation. The source must meet all of the requirements listed in 40 CFR 63.2850(a) and one of the options listed in 40 CFR 63.2850(e)(1)(i) through (iii).
- ii. Malfunction period. Throughout the malfunction period, you must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating during a malfunction period. At the end of the malfunction period, the source must then meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(e)]

- h. The permittee must develop a written SSM plan in accordance with 40 CFR 63.6(e)(3). The permittee must complete the SSM plan before the compliance date for the source. The permittee must also keep the SSM plan on-site and readily available as long as the source is operational. The SSM plan provides detailed procedures for operating and maintaining your source to minimize emissions during a qualifying SSM event for which the source chooses the 40 CFR 63.2850(e)(2) malfunction period, or the 40 CFR 63.2850(d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. Some or all of the procedures may come from plans developed for other purposes such as a Standard Operating Procedure manual or an Occupational Safety and Health Administration Process Safety Management plan. To qualify as a SSM plan, other such plans must meet all the applicable requirements of these NESHAP.

[40 CFR 63.2852]

- i. In accordance with US EPA Consent Decree (see Paragraphs 38, 39, and 66), the permittee has committed to an SLR for this emissions unit at this facility of 0.175 gallons VOC per ton of soybeans processed.



- j. In accordance with Paragraph 73 of the Consent Decree, compliance with the interim and final VOC SLR limits [in this Consent Decree] shall be determined in accordance with 40 CFR Part 63, Subpart GGGG, with the following exceptions: (1) provisions pertaining to HAP content shall not apply; (2) monitoring and recordkeeping of solvent losses at each plant shall be conducted daily; (3) solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses; and (4) records shall be kept in the form of the table in Attachment 13 of the Consent Decree, that show total solvent losses, solvent losses during malfunction periods, and adjusted solvent losses (i.e., total solvent losses minus malfunction losses) monthly and on a twelve-month rolling basis.
- k. **Malfunctions.** In accordance with Paragraph 74 of the Consent Decree, the permittee may apply the provisions of 40 C.F.R. Part 63, Subpart GGGG pertaining to malfunction periods only when the conditions in both subparagraph (i) and (ii) are met: (i) The malfunction results in a total plant shutdown. [For purposes of this Consent Decree,] a “total plant shutdown” means a shutdown of the solvent extraction system. (ii) Cumulative solvent losses during malfunction periods at a plant do not exceed 4000 gallons in a 12-month rolling period. At all other times, the permittee must include all solvent losses when determining compliance with its final VOC SLR limit.
- l. In accordance with Paragraph 75 of the Consent Decree, during a malfunction period, the permittee shall comply with the Startup, Shutdown, Malfunction (“SSM”) Plan as required under Subpart GGGG for the plant. The solvent loss corresponding to a malfunction period will be calculated as the difference in the total solvent inventories for the day before the malfunction period began and the day the plant resumes normal operation.
- m. This emissions unit is not subject to the requirements of the rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) **Operational Restrictions**

- (1) None.

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

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

40 CFR 63.2862(b)	compliance plan and SSM plan retention on-site
40 CFR 63.2862(c)	records for hexane mass balance calculations
40 CFR 63.2862(d)	records for calculation of rolling 12-month averages and the 'compliance ratio'



40 CFR 63.2862(e)	records for startup, shutdown, and malfunction events
40 CFR 63.2863	records retention

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

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA, Northwest District Office, as are required pursuant to 40 CFR Part 63, Subpart GGGG

40 CFR 63.2860(c)	significant modification notifications, as applicable
40 CFR 63.2861(a)	annual compliance certification
40 CFR 63.2861(b)	deviation notification report
40 CFR 63.2861(c)	periodic startup, shutdown, and malfunction report
40 CFR 63.2861(d)	immediate startup, shutdown, and malfunction report

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

f) Testing Requirements

- (1) Compliance with the 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:

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

Applicable Compliance Method:

Compliance shall be based on the requirements specified in b)(2)a. through b)(2)h.

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

b. Emission Limitation:

(SLF) - 0.175 gallon VOC /ton soybeans processed [See b)(2)i.]

Applicable Compliance Method:

Compliance shall be based on the requirements specified in b)(2)j through b)(2)l.

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



Preliminary Proposed Title V Permit

ADM-Fostoria

Permit Number: P0118363

Facility ID: 0332020187

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



7. P017, DTDC

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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) (PTI 03-2231 issued December 4, 1985)	0.24 lb particulate emissions (PE) /hr, 1.05 tons PE /yr (Dryer Deck 1 cyclone) 0.28 lb PE /hr, 1.23 tons PE /yr (Dryer Deck 2 cyclone) 0.59 lb PE /hr, 2.58 tons PE /yr (DTDC cooler cyclone)
b.	OAC rule 3745-17-11(B)	none [See b)(2)a.]
c.	OAC rule 3745-17-07(A)	none [See b)(2)b.]
d.	40 CFR, Part 63, Subpart GGGG [40 CFR 63.2830 - 63.2872] In accordance with 40 CFR 63.2832 and 63.2833, this emissions unit is a component of an existing affected source consisting of a vegetable oil production process that is subject to the emission limitations/control measures specified in this section.	See 40 CFR 63.2840 [Table 1 (ix)] Solvent Loss Factor (SLF) - 0.2 gallon Hazardous Air Pollutant (HAP) /ton oilseed See b)(2)c. through b)(2)n.
e.	40 CFR 63.1-15 [40 CFR 63.2870 Table 1 of Subpart GGGG]	Table 1 in Section 63.2870 of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGG shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

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

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

c. HAP loss requirements:

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

$$\text{Compliance Ratio} = \text{Actual HAP Loss} / \text{Allowable HAP Loss}$$

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

$$\text{Compliance Ratio} = [(f) \times (\text{Actual Solvent Loss})] / [0.64 \times \text{Oilseed} \times \text{SLF}]$$

Where:

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

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

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

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

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

[40 CFR 63.2840(a)]



- d. When the source has processed listed oilseed for 12 operating months, calculate the compliance ratio by the end of each calendar month following an operating month using Equation 2 of this section. When calculating your compliance ratio, consider the following conditions and exclusions:
 - i. If the source processes any quantity of listed oilseeds in a calendar month and the source is not operating under an initial startup period or malfunction period subject to 40 CFR 63.2850, then the permittee must categorize the month as an operating month, as defined in 40 CFR 63.2872.
 - ii. The 12-month compliance ratio may include operating months occurring prior to a source shutdown and operating months that follow after the source resumes operation.
 - iii. If the source shuts down and processes no listed oilseed for an entire calendar month, then the permittee must categorize the month as a non-operating month, as defined in 40 CFR 63.2872. Exclude any non-operating months from the compliance ratio determination.
 - iv. If the source is subject to an initial startup period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the initial startup period.
 - v. If the source is subject to a malfunction period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the malfunction period.
[40 CFR 63.2840(b)]
- e. If the compliance ratio is less than or equal to 1.00, the source was in compliance with the HAP emission requirements for the previous operating month.
[40 CFR 63.2840(c)]
- f. The permittee, i.e. you, shall:
 - i. Maintain all the necessary records you have used to demonstrate compliance with Subpart GGGG in accordance with 40 CFR 63.2862.
 - ii. Submit the reports as specified in 40 CFR 63.2850(a)(5).
 - iii. Submit all notifications and reports and maintain all records required by the MACT General Provisions for performance testing if you add a control device that destroys solvent.
[40 CFR 63.2850(a)(4), (5), and (6)]
- g. Existing sources under normal operation: The permittee must meet all of the requirements listed in Table 1 of 40 CFR 63.2850 for sources under normal operation.
[40 CFR 63.2850(b)]



- h. Existing or new sources that have been significantly modified: An existing or new source that has been significantly modified must meet the requirements associated with one of two compliance options. Within 15 days of the modified source startup date, you must choose to comply with one of the options listed in f.i or f.ii as follows:

 - i. Normal operation. Upon startup of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources under normal operation, and the schedules for demonstrating compliance for an existing or new source that has been significantly modified in Table 2 of that section.
 - ii. Initial startup period. For up to 3 calendar months after the startup date of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating under an initial startup period, and the schedules for demonstrating compliance for a significantly modified existing or new source operating under an initial startup period in Table 2 of that section. After a maximum of 3 calendar months, a new or existing source must meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(d)]
- i. Existing or new sources experiencing a malfunction: A malfunction is defined in 40 CFR 63.2. In general, it means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or process equipment to function in a usual manner. If an existing or new source experiences an unscheduled shutdown as a result of a malfunction, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, then the permittee must meet the requirements associated with one of two compliance options. Routine or scheduled process startups and shutdowns resulting from, but not limited to, market demands, maintenance activities, and switching types of oilseed processed, are not startups or shutdowns resulting from a malfunction and, therefore, do not qualify for this provision. Within 15 days of the beginning date of the malfunction, the permittee must choose to comply with one of the options listed in b)(2)g.i. or b)(2)g.ii. as follows:

 - i. Normal operation. The source must meet all of the requirements listed in 40 CFR 63.2850(a) and one of the options listed in 40 CFR 63.2850(e)(1)(i) through (iii).
 - ii. Malfunction period. Throughout the malfunction period, you must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating during a malfunction period. At the end of the malfunction period, the source must then meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(e)]



- j. The permittee must develop a written SSM plan in accordance with 40 CFR 63.6(e)(3). The permittee must complete the SSM plan before the compliance date for the source. The permittee must also keep the SSM plan on-site and readily available as long as the source is operational. The SSM plan provides detailed procedures for operating and maintaining your source to minimize emissions during a qualifying SSM event for which the source chooses the 40 CFR 63.2850(e)(2) malfunction period, or the 40 CFR 63.2850(d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. Some or all of the procedures may come from plans developed for other purposes such as a Standard Operating Procedure manual or an Occupational Safety and Health Administration Process Safety Management plan. To qualify as a SSM plan, other such plans must meet all the applicable requirements of these NESHAP. [40 CFR 63.2852]
- k. In accordance with US EPA Consent Decree (see Paragraphs 38, 39, and 66), the permittee has committed to an SLR for this emissions unit at this facility of 0.175 gallons VOC per ton of soybeans processed.
- l. In accordance with Paragraph 73 of the Consent Decree, compliance with the interim and final VOC SLR limits [in this Consent Decree] shall be determined in accordance with 40 CFR Part 63, Subpart GGGG, with the following exceptions: (1) provisions pertaining to HAP content shall not apply; (2) monitoring and recordkeeping of solvent losses at each plant shall be conducted daily; (3) solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses; and (4) records shall be kept in the form of the table in Attachment 13 of the Consent Decree, that show total solvent losses, solvent losses during malfunction periods, and adjusted solvent losses (i.e., total solvent losses minus malfunction losses) monthly and on a twelve-month rolling basis.
- m. Malfunctions. In accordance with Paragraph 74 of the Consent Decree, the permittee may apply the provisions of 40 C.F.R. Part 63, Subpart GGGG pertaining to malfunction periods only when the conditions in both subparagraph (i) and (ii) are met: (i) The malfunction results in a total plant shutdown. [For purposes of this Consent Decree,] a “total plant shutdown” means a shutdown of the solvent extraction system. (ii) Cumulative solvent losses during malfunction periods at a plant do not exceed 4000 gallons in a 12-month rolling period. At all other times, the permittee must include all solvent losses when determining compliance with its final VOC SLR limit.
- n. In accordance with Paragraph 75 of the Consent Decree, during a malfunction period, the permittee shall comply with the Startup, Shutdown, Malfunction (“SSM”) Plan as required under Subpart GGGG for the plant. The solvent loss corresponding to a malfunction period will be calculated as the difference in the total solvent inventories for the day before the malfunction period began and the day the plant resumes normal operation.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

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

Table with 2 columns: CFR Reference and Description. Rows include 40 CFR 63.2862(b) compliance plan and SSM plan retention on-site, 40 CFR 63.2862(c) records for hexane mass balance calculations, 40 CFR 63.2862(d) records for calculation of rolling 12-month averages and the 'compliance ratio', 40 CFR 63.2862(e) records for startup, shutdown, and malfunction events, and 40 CFR 63.2863 records retention.

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



e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any abnormal visible particulate emissions were observed from any stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

(2) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA, Northwest District Office, as are required pursuant to 40 CFR Part 63, Subpart GGGG

40 CFR 63.2860(c)	significant modification notifications, as applicable
40 CFR 63.2861(a)	annual compliance certification
40 CFR 63.2861(b)	deviation notification report
40 CFR 63.2861(c)	periodic startup, shutdown, and malfunction report
40 CFR 63.2861(d)	immediate startup, shutdown, and malfunction report

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

f) Testing Requirements

(1) Compliance with the 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 Limitations:

- 0.24 lb PE /hr, 1.05 tons/yr (Dryer Deck 1 cyclone)
- 0.28 lb PE /hr, 1.23 tons/yr (Dryer Deck 1 cyclone)
- 0.59 lb PE /hr, 2.58 tons/yr (DTDC cooler cyclone)

Applicable Compliance Method:

Compliance with the hourly emission limitation(s) was demonstrated by emission testing conducted on April 3-5, 2013. If required, the permittee shall demonstrate compliance with the hourly emission limitation(s) through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 5



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

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

g) Miscellaneous Requirements

(1) None.



8. P018, Fluid Bed Dryer

Operations, Property and/or Equipment Description:

Fluid bed drying/conditioning - with process cyclone and baghouse

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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) (PTI# 03-3224 issued September 1, 1999)	9.50 lb particulate emissions (PE) /hr, 41.6 tons PE /yr 3.36 lb particulate matter (filterable) less than 10 microns (PM ₁₀) /hr, 14.7 tons PM ₁₀ /yr Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	See b)(2)a.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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



maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

- a. The permittee shall record the pressure drop, in inches of water, across the cyclone on a weekly basis.
- b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - i. the date and time the deviation began and the magnitude of the deviation at that time;
 - ii. the date(s) the investigation was conducted;
 - iii. the names of the personnel who conducted the investigation; and
 - iv. the findings and recommendations.
- c. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary.
 - i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary
 - (a) the reason corrective action was not necessary; and
 - (b) the date and time the deviation ended.
 - ii. The permittee shall maintain records of the following information for each corrective action taken:
 - (a) a description of the corrective action;
 - (b) the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation;
 - (c) the pressure drop readings immediately after the corrective action; and
 - (d) the names of the personnel who performed the work.
 - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



- d. The acceptable range for the pressure drop across the cyclone is 1.0 to 6.0 inches of water.
- e. This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

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

e) Reporting Requirements

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

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

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

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 Limitations:
 - 9.50 lb PE /hr, 41.6 tons PE /yr
 - 3.36 lb PM₁₀ /hr, 14.7 tons PM₁₀ /yr



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Applicable Compliance Method:

Compliance with the hourly emission limitation(s) was demonstrated by emission testing conducted on October 21-27, 2010. If required, the permittee shall demonstrate compliance with the hourly emission limitation(s) through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 5 for PE, and Method 201 or 201A of 40 CFR 51, Appendix M for PM₁₀.

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

[OAC 3745-77-07(C)(1) and PTI# 03-3224]

- g) Miscellaneous Requirements
 - (1) None.



9. P020, Pellet Cooler

Operations, Property and/or Equipment Description:

Millfeed pellet cooler - with process cyclone

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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) (PTI 03-9408 issued February 28, 1996)	2.8 lb particulate emissions (PE) /hr, 12.3 tons PE /yr 1.4 lb particulate matter (filterable) less than 10 microns (PM ₁₀) /hr, 6.1 tons PM ₁₀ /yr Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)a.

(2) Additional Terms and Conditions

a. The emission limitation specified by OAC rules 3745-17-11(B) and 17-07(A) are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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



maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

- a. The permittee shall record the pressure drop, in inches of water, across the cyclone on a weekly basis.
- b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - i. the date and time the deviation began and the magnitude of the deviation at that time;
 - ii. the date(s) the investigation was conducted;
 - iii. the names of the personnel who conducted the investigation; and
 - iv. the findings and recommendations.
- c. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary.
 - i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary
 - (a) the reason corrective action was not necessary; and
 - (b) the date and time the deviation ended.
 - ii. The permittee shall maintain records of the following information for each corrective action taken:
 - (a) a description of the corrective action;
 - (b) the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation;
 - (c) the pressure drop readings immediately after the corrective action; and
 - (d) the names of the personnel who performed the work.
 - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



- d. The acceptable range for the pressure drop across the cyclone is 2.0 to 7.0 inches of water.
- e. This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

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

e) Reporting Requirements

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

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

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

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 Limitations:
 - 2.8 lb PE /hr, 12.3 tons PE /yr
 - 1.4 lb PM₁₀ /hr, 6.1 tons PM₁₀ /yr



Applicable Compliance Method:

The permittee may determine compliance with the above emission limitations by multiplying the maximum process weight rate (tons/hr) by emission factors of 0.36 lb of PE /ton and 0.18 lb PM₁₀ /ton throughput (AP-42 Table 9.9.1-2 [05/98]).

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

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation(s) through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 5 for PE, and Method 201 or 201A of 40 CFR 51, Appendix M for PM₁₀.

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

g) Miscellaneous Requirements

- (1) None.



10. P026, Grain Cleaning and Secondary dehulling baghouse

Operations, Property and/or Equipment Description:

Grain Cleaning, Secondary De-hulling - with process baghouse

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 3745-17-11(B)	15.3 lbs particulate emissions (PE) /hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:



- i. the date and time the deviation began and the magnitude of the deviation at that time;
 - ii. the date(s) the investigation was conducted;
 - iii. the names of the personnel who conducted the investigation; and
 - iv. the findings and recommendations.
- c. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary.
- i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary
 - (a) the reason corrective action was not necessary; and
 - (b) the date and time the deviation ended.
 - ii. The permittee shall maintain records of the following information for each corrective action taken:
 - (a) a description of the corrective action;
 - (b) the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation;
 - (c) the pressure drop readings immediately after the corrective action; and
 - (d) the names of the personnel who performed the work.
 - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
- d. The acceptable range for the pressure drop across the baghouse is 0.5 to 8.0 inches of water.
- e. This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this



emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

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

e) Reporting Requirements

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

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

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

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:
15.3 lbs PE /hr

Applicable Compliance Method:

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

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

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



b. Emission Limitation:

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

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.



11. P903, Truck unloading

Operations, Property and/or Equipment Description:

Soybean receiving by truck - with baghouse

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

(1) b)(1)c., b)(2)d., and b)(2)e.

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(F) (PTI P0119369, issued September 1, 2015)	0.01 grains per dry standard cubic foot (gr/dscf) for Particulate Matter less than 10 microns in size/Particulate Matter less than 2.5 microns in size (PM10/PM2.5). PM10/PM2.5 shall not exceed 0.94 lb/hr and 4.13 tons/yr from the stack serving this emissions unit Fugitive PM10 shall not exceed 0.69 ton/yr Fugitive PM2.5 shall not exceed 0.12 ton/yr See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)d. and b)(2)e.
d.	OAC rule 3745-17-11(B)	See b)(2)f.
e.	OAC rule 3745-17-07(A)	See b)(2)g.
f.	OAC rule 3745-17-08(B)	See b)(2)f.
g.	OAC rule 3745-17-07(B)	See b)(2)g.
h.	40 CFR Part 60, Subpart DD	Particulate emissions (PE) shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible emissions from the stack serving this emissions unit shall not exceed 0% opacity.</p> <p>Visible emissions of fugitive dust from the truck unloading operations shall not exceed 5% opacity.</p>

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:
 - i. 0.01 grains per gr/dscf for PM10/PM2.5;
 - ii. PM10/PM2.5 shall not exceed 0.94 lb/hr and 4.13 tons/yr from the stack serving this emissions unit;
 - iii. Fugitive PM10 shall not exceed 0.69 tons per year;
 - iv. Fugitive PM2.5 shall not exceed 0.12 tons per year;
- b. The Best Available Technology (BAT) requirements for this emissions unit have been determined to be the following:
 - i. PM10 emissions shall not exceed 0.40 ton per month averaged over a 12-month rolling period, for stack and fugitive emissions combined; and
 - ii. PM2.5 emissions shall not exceed 0.35 ton per month averaged over a 12-month rolling period, for stack and fugitive emissions combined.
- c. These BAT emission limits apply until the U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) [less than 10 tons per year BAT exemption] into the Ohio State Implementation Plan (SIP).
- d. BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter 10 microns or less in size (PM10) and particulate matter less than 2.5 microns in size (PM2.5) emissions from this air contaminant source since the calculated annual emission rates for PM10 and PM2.5 are less than 10 tons per year taking into account the permittee's request for voluntary restrictions under OAC rule 3745-31-05(F).

The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable



to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) do not involve an established NAAQS.

- e. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) [the less than 10 tons per year BAT exemption] as part of the Ohio SIP.
- f. Voluntary restrictions proposed by the permittee under OAC rule 3745-31-05(F) are equivalent to or more stringent than the requirements/emission limitations established under this applicable rule.
- g. Opacity restrictions under 40 CFR Part 60, Subpart DD are more stringent than the requirements/emission limitations established under this applicable rule.

c) **Operational Restrictions**

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [See b)(2)a.):

- a. This emissions unit shall be vented to a baghouse capable of achieving a grain loading of 0.01 grains per dry standard cubic foot (gr/dscf) for PM10 and PM2.5 emissions.

[OAC 3745-77-07(A)(1) and PTI P0119369]

(2) The permittee shall operate the baghouse when this emissions unit is in operation.

[OAC 3745-77-07(A)(1) and PTI P0119369]

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

(1) The permittee shall document each day whether or not the baghouse was in service when the emissions unit was in operation.

[OAC 3745-77-07(C)(1) and PTI P0119369]

(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 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 emissions incident; and



- c. any corrective actions taken to eliminate the visible emissions.

[OAC 3745-77-07(C)(1) and PTI P0119369]

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from this emissions unit. 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 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)(3)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.

[OAC 3745-77-07(C)(1) and PTI P0119369]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from this emissions unit and
 - c. any corrective actions taken to eliminate the visible particulate stack or fugitive emissions.



These reports shall be submitted to the Director (the appropriate OHIO EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC 3745-77-07(C)(1) and PTI P0119369]

- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing the baghouse was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

[OAC 3745-77-07(C)(1) and PTI P0119369]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit;
 - b. The emission testing shall be conducted to demonstrate compliance with:
 - i. the allowable concentrations of PE [0.01 gr/dscf PE - from 40 CFR Part 60, Subpart DD], PM10/PM2.5 [0.01 gr/dscf PM10/PM2.5 – from OAC rule 3745-31-05(F)] in the exhaust stream;
 - ii. the allowable mass emission rate of 0.94 lbs/hr PM10/PM2.5;
 - iii. the opacity limits from 40 CFR Part 60, Subpart DD of 0% from the stack serving this emissions unit, and 5% fugitive dust from the truck unloading operations.*

*The opacity testing shall be done at the same time as the stack testing for compliance with the 0.01 gr/dscf PE, i.e. compliance with 40 CFR Part 60, Subpart DD.

- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:
 - i. For PE – Methods 1-5 of 40 CFR Part 60, Appendix A;
 - ii. For PM10/PM2.5 – Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M* and
 - iii. For opacity – Method 9 of 40 CFR, Part 60, Appendix A.

*The test method includes both PM10 and PM2.5 but does not differentiate between them.



Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC 3745-77-07(C)(1) and PTI P0119369]

- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.01 gr/dscf PM10/PM2.5 emissions



Applicable Compliance Method:

Compliance with the grain loading emissions limitation shall be demonstrated by emissions testing in accordance with f)(1) above.

[OAC 3745-77-07(C)(1) and PTI P0119369]

b. Emission Limitations:

PM10/PM2.5 shall not exceed 0.94 lb/hr and 4.13 tons/yr from the stack serving this emissions unit

Applicable Compliance Method:

Compliance with the hourly PM10/PM2.5 emissions limitation shall be demonstrated by emissions testing in accordance with f)(1) above.

The annual allowable PM10/PM2.5 limitation was developed by multiplying the hourly limitation by 8760 hours/year, then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI P0119369]

c. Emission Limitation:

Fugitive PM10 shall not exceed 0.69 ton per year

Applicable Compliance Method:

The emission limitation above represents the potential to emit (PTE) from the unit and was determined by multiplying a maximum process weight rate of 405 tons soybeans/hr, an emission factor of 0.0078 lb PM10/ton soybeans, a capture efficiency of 95%, and conversion factors of 8760 hrs/yr and 1 ton/2000 lbs. Since this emission limitation represents the maximum emission rate from the unit, no monitoring, recordkeeping, or deviation reporting are required to demonstrate compliance with this limitation.

[OAC 3745-77-07(C)(1) and PTI P0119369]

d. Emission Limitation:

Fugitive PM2.5 shall not exceed 0.12 ton per year

Applicable Compliance Method:

The emission limitation above represents the potential to emit (PTE) from the unit and was determined by multiplying a maximum process weight rate of 405 tons soybeans/hr, an emission factor of 0.0013 lb PM2.5/ton soybeans, a capture efficiency of 95%, and conversion factors of 8760 hrs/yr, and 1 ton/2000 lbs. Since this emission limitation represents the maximum emission rate from the



unit, no monitoring, recordkeeping, or deviation reporting are required to demonstrate compliance with this limitation.

[OAC 3745-77-07(C)(1) and PTI P0119369]

e. Emission Limitation:

PM10 emissions shall not exceed 0.40 ton per month averaged over a 12-month rolling period, for stack and fugitive emissions combined

Applicable Compliance Method:

The emission limitation above was developed by adding the maximum annual stack emissions of 4.13 tons/yr PM10/PM2.5 and the maximum annual fugitive emissions of 0.69 ton PM10 per year, and then dividing by 12. Since this emission limitation represents the maximum emission rate from the unit, no monitoring, recordkeeping, or deviation reporting are required to demonstrate compliance with this limitation.

[OAC 3745-77-07(C)(1) and PTI P0119369]

f. Emission Limitation:

PM2.5 emissions shall not exceed 0.35 ton per month averaged over a 12-month rolling period, for stack and fugitive emissions combined

Applicable Compliance Method:

The emission limitation was developed by adding the maximum annual stack emissions of 4.13 tons/yr PM10/PM2.5 and the maximum annual fugitive emissions of 0.12 tons PM10 per year, and then dividing by 12. Since this emission limitation represents the maximum emission rate from the unit, no monitoring, recordkeeping, or deviation reporting are required to demonstrate compliance with this limitation.

[OAC 3745-77-07(C)(1) and PTI P0119369]

g. Emission Limitation:

PE shall not exceed 0.01 gr/dscf

Applicable Compliance Method:

Compliance with the grain loading emissions limitation shall be demonstrated by emissions testing in accordance with f)(1) above.

[OAC 3745-77-07(C)(1) and PTI P0119369]



h. Emission Limitation:

Visible emissions from the stack serving this emissions unit shall not exceed 0% opacity

Applicable Compliance Method:

Compliance with the above emission limitation shall be determined in accordance with the requirements in f)(1) above.

[OAC 3745-77-07(C)(1) and PTI P0119369]

i. Emission Limitation:

Visible emissions of fugitive dust from the truck unloading operations shall not exceed 5% opacity

Applicable Compliance Method:

Compliance with the above emission limitation shall be determined in accordance with the requirements in f)(1) above.

[OAC 3745-77-07(C)(1) and PTI P0119369]

g) Miscellaneous Requirements

(1) None.



12. P904, Rail unloading

Operations, Property and/or Equipment Description:

Soybean receiving by rail with transfer & conveying

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 3745-17-11(B)	none [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	none [See b)(2)b.]
c.	OAC rule 3745-17-07(B)(1)	none [See b)(2)a.]
d.	OAC rule 3745-17-08(B)(1)	none [See b)(2)b.]

(2) Additional Terms and Conditions

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

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

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

d. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.



13. Emissions Unit Group -handling, processing group: P007, P008, P021, P022,

EU ID	Operations, Property and/or Equipment Description
P007	Flaking roller mills, with aspiration and cyclone
P008	Hull grinders, with aspiration and baghouse
P021	Primary bean dehulling (separating from meats), with cyclone
P022	Flake conveyor

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 3745-17-11(B)	none [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	none [See b)(2)b.]

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



Preliminary Proposed Title V Permit

ADM-Fostoria

Permit Number: P0118363

Facility ID: 0332020187

Effective Date: To be entered upon final issuance

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



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

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

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific 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(F) (PTI P0116683 issued April 21, 2014)	<u>Stack Emissions (from P901 and P902 combined):</u> 2.14 lbs of particulate matter 10 microns of less in size (PM10)/hour; 9.37 tons of PM10/year Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average <u>Fugitive Emissions (from P901 and P902 combined):</u> 39.94 tons of fugitive PM10/year Visible fugitive PE shall not exceed 20% opacity, as a three-minute average See b)(2)a. and b)(2)b.
b.	ORC 3704.03(T)	See b)(2)c. and b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)f.
d.	OAC rule 3745-17-07(B)	See b)(2)g.
e.	OAC rule 3745-17-08(B)	See b)(2)h.



(2) Additional Terms and Conditions

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

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

- c. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be compliance with the voluntary requirement established under OAC rule 3745-31-05(F) to use a baghouse achieving a maximum outlet concentration of 0.01 grain PM10/dscf.
- d. The BAT requirements under ORC 3704.03(T) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) do not involve an established NAAQS. It should also be noted that fugitive emissions from source are not considered in the determination of Prevention of Significant Deterioration (PSD) applicability.
- e. The emissions shall be vented to a baghouse at all times the emissions unit is in operation.
- f. These emissions units are exempt from the visible emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.



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

c) **Operational Restrictions**

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

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

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 - 8 inches of water while the emissions unit is in operation.
[OAC 3745-77-07(C)(1) and PTI P0116683]
- (2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this



emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

- a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.
- b. Whenever the monitored value for the pressure drop deviates from the range specified in d)(1), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - i. the date and time the deviation began and the magnitude of the deviation at that time;
 - ii. the date(s) the investigation was conducted;
 - iii. the names of the personnel who conducted the investigation; and
 - iv. the findings and recommendations.
- c. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary.
 - i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary
 - (a) the reason corrective action was not necessary; and
 - (b) the date and time the deviation ended.
 - ii. The permittee shall maintain records of the following information for each corrective action taken:
 - (a) a description of the corrective action;
 - (b) the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation;
 - (c) the pressure drop readings immediately after the corrective action; and
 - (d) the names of the personnel who performed the work.
 - iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



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

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

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

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

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

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

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



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

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

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

- (2) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points serving this emissions unit;
- b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (3) The permittee shall submit annual deviation (excursion) reports that identify any of the following, as well as the corrective actions that have been taken to achieve compliance:

- a. any exceedances of the annual meal throughput limitation contained in c)(3).

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

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

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0116683, issued on 04/21/14: **[e)(2)]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]



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:

Stack Emissions

a. Emission Limitations:

2.14 lbs of PM10/hour; 9.37 tons of PM10/year

Applicable Compliance Method:

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

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

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

b. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six-minute average

Applicable Compliance Method:

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

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

Fugitive Emissions

c. Emission Limitation:

39.94 tons of fugitive PM10/year

Applicable Compliance Method:

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

- i. emissions from meal loading of trucks and railcars were determined by applying a 75% capture efficiency for the baghouse control system to fugitive emissions generated from the loading operation. The fugitive emissions from the loading operation were calculated by multiplying a



maximum meal loadout throughput of 2,502,857 tons/year, an emission factor of 0.12 lb of PM10/ton* and a conversion factor of ton/2000 lbs.

- ii. emissions from meal loading of closed containers were determined by multiplying by a maximum meal loadout throughput of 40,000 tons/year, an emission factor of 0.12 lb of PM10/ton, and a conversion factor of ton/2000 lbs.

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

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

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

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

d. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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

g) Miscellaneous Requirements

- (1) None.