Ohio Environmental Protection Agency

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

6/15/2016

Certified Mail

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

Delin Johnson
CARGILL INC
309 West Main St.
Circleville, OH 43113

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0165010071
Permit Number: P0120302
Permit Type: Initial Installation
County: Pickaway

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-CDO

Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
CARGILL INC

Facility ID:	0165010071
Permit Number:	P0120302
Permit Type:	Initial Installation
Issued:	6/15/2016
Effective:	6/15/2016
Expiration:	8/24/2022

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
CARGILL INC

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Authorization

Facility ID:	0165010071
Application Number(s):	A0053237
Permit Number:	P0120302
Permit Description:	Initial installation permit for a country grain elevator that was previously on registration status as one unit, and is now being split into individual emissions units (includes two receiving pits, grain handling, a grain dryer, two loadouts and parking/roadways.
Permit Type:	Initial Installation
Permit Fee:	$7,700.00
Issue Date:	6/15/2016
Effective Date:	6/15/2016
Expiration Date:	8/24/2022

Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

CARGILL INC
309 W MAIN ST
CIRCLEVILLE, OH 43113

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0120302
Permit Description: Initial installation permit for a country grain elevator that was previously on registration status as one unit, and is now being split into individual emissions units (includes two receiving pits, grain handling, a grain dryer, two loadouts and parking/roadways.

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

Emissions Unit ID:	**F002**
Company Equipment ID:	ZIMMERMAN GRAIN DRYER
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F005**
Company Equipment ID:	Dump Pit #1 - Tr
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F006**
Company Equipment ID:	Dump Pit #2 - Tr
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F007**
Company Equipment ID:	Grain Handling
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F008**
Company Equipment ID:	Loadout #1 - Tr/R
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F009**
Company Equipment ID:	Loadout #2 - Tr
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F010**
Company Equipment ID:	Paved/Unpaved Roads
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. F002, ZIMMERMAN GRAIN DRYER

Operations, Property and/or Equipment Description:

Column grain dryer with 0.078" perforations

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a. below.
b.	OAC rule 3745-17-08(A)(1)	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3) (Best Available Technology for PE, NO_x, CO, SO_2, and VOC)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average. Particulate emissions shall not exceed 12.5 pounds per hour and 21.3 tons per year. Nitrogen oxides (NO_x) emissions shall not exceed 4.08 pounds per hour and 17.86 tons per year. Carbon monoxide emissions (CO) shall not exceed 3.43 pounds per hour and 15.0 tons per year.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Sulfur dioxide (SO_2) emissions shall not exceed 0.02 pounds per hour and 0.11 tons per year. Volatile organic compound (VOC) emissions shall not exceed 0.22 pounds per hour and 0.98 tons per year. See b)(2)c. below.

(2) Additional Terms and Conditions

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

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c. The hourly and annual emissions limitations were established to reflect the potential-to-emit for each pollutant for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) This emissions unit shall burn only natural gas.

d) Monitoring and/or Recordkeeping Requirements

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

e) Reporting Requirements

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

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this

permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emissions Limitations:

Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitations:

PE shall not exceed 12.5 lb/hr.

Applicable Compliance Method:

Compliance is inherent based upon the following equation:

Emissions = (maximum hourly grain drying rate) * (60 bu grain/lb grain) * (EF) / (2,000 lb/ton), where;

Maximum hourly grain drying rate = 4,000 bu/hr

EF = 0.104 lb PE/ton (emissions factor from permit P0117437 based on manufacturer's supplied performance testing data)

If required, compliance with the emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitations:

PE shall not exceed 21.3 ton/yr.

Applicable Compliance Method:

The annual PE limitation was established based on the maximum potential grain throughput of 13,656,000 bushels using the following equation:

Emissions = (maximum annual grain throughput in bushels) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) / (2,000 lb/ton), where;

EF = 0.104 lb PE/ton (emissions factor from permit P0117437 based on manufacturer's supplied performance testing data)

d. Emissions Limitations:

NO_x emissions shall not exceed 4.08 lb/hr and 17.86 ton/yr.
CO emissions shall not exceed 3.43 lb/hr and 15.0 ton/yr.

SO_2 emissions shall not exceed 0.02 lb/hr and 0.11 ton/yr.
VOC emissions shall not exceed 0.22 lb/hr and 0.98 ton/yr.
Applicable Compliance Method:

Compliance with the hourly emissions limitations is inherent based upon the following equation:

Hourly Emissions = (41.6 MMBtu/hr) * (EF / 1,020 MMBtu/MMscf), where;

EF = emissions factor from AP-42, Section 1.4, Tables 1.4-1 and 1.4-2 in lb/MMscf (100 for NO_x, 84 for CO, 0.6 for SO_2, and 5.5 for VOC)

The annual emissions limitations were established by multiplying the hourly limitations by 8,760 hours per year and dividing by 2,000 pounds per ton as demonstrated by the following equation:

Annual Emissions = (Hourly Emissions * 8,760 hr/day) / 2,000 lb/ton

Compliance with the annual emissions limitations is assumed provided the permittee complies with the hourly emissions limitations.

If required, compliance with the emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 6C, 7E, 10, and 25 or 25A.

g) Miscellaneous Requirements

(1) None.

2. F005, Dump Pit #1 - Tr

Operations, Property and/or Equipment Description:

Grain receiving by truck via gravity and controlled by baghouse, dump pit #1

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible emissions from the stack of the baghouse serving emissions units F005, F007, and F008 shall not exceed twenty percent opacity as a six-minute average.
b.	OAC rule 3745-17-07(B)	See b)(2)a. below.
c.	OAC rule 3745-17-08(A)(1)	See b)(2)b. below.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008, shall not exceed 15.3 pounds per hour, based upon Figure II of OAC rule 3745-17-11.
e.	OAC rule 3745-31-05(A)(3) (Best Available Technology for PE)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average. Particulate emissions shall not exceed 6.6 pounds per hour and 1.49 tons per year. See b)(2)c. and b)(2)d. below.

(2) Additional Terms and Conditions

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

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c. The emissions from the receiving operations associated with this emission unit shall be vented to a baghouse at all times when the emission unit is in operation.

d. The hourly and annual emissions limitations were established to reflect the controlled potential-to-emit for each pollutant for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

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 of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and for any visible particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008. 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 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)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer

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

e) Reporting Requirements

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

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

(3) The permittee shall identify the following information in the PER in accordance with the monitoring requirements for visible emissions in term d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving emissions units F005, F007, and F008;

b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

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. <u>Emission Limitations:</u>

Visible emissions from the stack of the baghouse serving emissions units F005, F007, and F008 shall not exceed twenty percent opacity as a six-minute average.

Visible emissions from fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

<u>Applicable Compliance Method:</u>

If required, compliance with the limitations for visible emissions shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitation:

Particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008, shall not exceed 15.3 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined based on the following equations:

Stack PE = $Emissions_{F005}$ + $Emissions_{F007}$ + $Emissions_{F008}$; where

$Emissions_{F005}$ = (bushels grain received * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain); and

CapE = capture efficiency (80%);

ConE = control efficiency (99%); and

$Emissions_{F007}$ = (bushels grain handled * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.061 lb PE/ton grain); and

CapE = capture efficiency (99%); and

ConE = control efficiency (99%);

$Emissions_{F008}$ = (bushels grain loaded out * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain); and

CapE = capture efficiency (80%); and

ConE = control efficiency (99%);

If required, compliance with the emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation:

Particulate emissions shall not exceed 6.6 lb/hr.

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be demonstrated by the following equations:

Total PE = Stack PE + Fugitive PE; where

Stack PE = (maximum hourly bushels of grain received * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

Maximum hourly bushels of grain received = 30,000 bushels per hour;

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain);

CapE = capture efficiency (80%); and

ConE = control efficiency (99%); and

Fugitive PE = (maximum hourly bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (1-CapE); where,

Maximum hourly bushels of grain received = 30,000 bushels per hour;

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain); and

CapE = capture efficiency (80%).

If required, compliance with the emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emissions Limitation:

PE shall not exceed 1.49 ton/yr.

Applicable Compliance Method:

The annual PE limitation was established based on the maximum potential grain throughput of 13,656,000 bushels using the following equations:

Total PE = Stack PE + Fugitive PE; where

Stack PE = (maximum annual bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain);

CapE = capture efficiency (80%); and

ConE = control efficiency (99%); and

Fugitive PE = (maximum annual bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (1-CapE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain); and

CapE = capture efficiency (80%).

g) Miscellaneous Requirements

(1) None.

3. F006, Dump Pit #2 - Tr

Operations, Property and/or Equipment Description:

Uncontrolled grain receiving by truck via gravity, dump pit #2

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a. below.
b.	OAC rule 3745-17-08(A)(1)	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3) (Best Available Technology for PE)	Visible emissions from fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average. Particulate emissions shall not exceed 10.5 pounds per hour and 7.17 tons per year. See b)(2)c. below.

(2) Additional Terms and Conditions

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

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c. The hourly and annual emissions limitations were established to reflect the potential-to-emit for each pollutant for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

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 of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 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)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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

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

(3) The permittee shall identify the following information in the PER in accordance with the monitoring requirements for visible emissions in term d)(1) above:

a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

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

Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitation:

PE shall not exceed 10.5 lb/hr.

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be demonstrated by the following equation:

PE = (maximum hourly bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF); where,

Maximum hourly bushels of grain received = 10,000 bushels per hour; and

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain)

If required, compliance with the emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation:

PE shall not exceed 7.17 ton/yr.

Applicable Compliance Method:

The annual PE limitation was established based on the maximum potential grain throughput of 13,656,000 bushels using the following equation:

PE = (maximum annual bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain)

g) Miscellaneous Requirements

(1) None.

4. F007, Grain Handling

Operations, Property and/or Equipment Description:

Enclosed grain handling - legs and conveyors controlled by baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible emissions from the stack of the baghouse serving emissions units F005, F007, and F008 shall not exceed twenty percent opacity as a six-minute average.
b.	OAC rule 3745-17-07(B)	See b)(2)a. below.
c.	OAC rule 3745-17-08(A)(1)	See b)(2)b. below.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008, shall not exceed 15.3 pounds per hour, based upon Figure II of OAC rule 3745-17-11.
e.	OAC rule 3745-31-05(A)(3) (Best Available Technology for PE)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average. Particulate emissions shall not exceed 1.46 pounds per hour and 0.24 tons per year. See b)(2)c. and b)(2)d. below.

(2) Additional Terms and Conditions

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

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c. The emissions from the grain handling operations associated with this emissions unit shall be vented to a baghouse at all times when the emission unit is in operation.

d. The hourly and annual emissions limitations were established to reflect the controlled potential-to-emit for each pollutant for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

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 emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and for any visible particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008. 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 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)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the

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

e) Reporting Requirements

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

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

(3) The permittee shall identify the following information in the PER in accordance with the monitoring requirements for visible emissions in term d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving emissions units F005, F007, and F008;

b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

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. <u>Emission Limitations:</u>

Visible emissions from the stack of the baghouse serving emissions units F005, F007, and F008 shall not exceed twenty percent opacity as a six-minute average.

Visible emissions from fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

<u>Applicable Compliance Method:</u>

If required, compliance with the limitations for visible emissions shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitation:

Particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008, shall not exceed 15.3 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined based on the following equations:

Stack PE = $Emissions_{F005}$ + $Emissions_{F007}$ + $Emissions_{F008}$; where

$Emissions_{F005}$ = (bushels grain received * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain); and

CapE = capture efficiency (80%);

ConE = control efficiency (99%); and

$Emissions_{F007}$ = (bushels grain handled * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.061 lb PE/ton grain); and

CapE = capture efficiency (99%); and

ConE = control efficiency (99%);

$Emissions_{F008}$ = (bushels grain loaded out * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain); and

CapE = capture efficiency (80%); and

ConE = control efficiency (99%);

If required, compliance with the emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation:

Particulate emissions shall not exceed 1.46 lb/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by the following equations:

Total PE = Stack PE + Fugitive PE; where

Stack PE = (maximum hourly bushels of grain handled * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

Maximum hourly bushels of grain handled= 40,000 bushels per hour

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.061 lb PE/ton grain); and

CapE = capture efficiency (99%); and

ConE = control efficiency (80%); and

Fugitive PE = (maximum hourly bushels of grain handled) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (1-CapE); where,

Maximum hourly bushels of grain handled = 40,000 bushels per hour;

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.061 lb PE/ton grain); and

CapE = capture efficiency (80%).

If required, compliance with the emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emissions Limitation:

Particulate emissions shall not exceed 0.24 ton/yr.

Applicable Compliance Method:

The annual PE limitation was established based on the maximum potential grain throughput of 13,656,000 bushels using the following equations:

Total PE = Stack PE + Fugitive PE; where

Stack PE = (maximum annual bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.061 lb PE/ton grain);

CapE = capture efficiency (99%); and

ConE = control efficiency (99%); and

Fugitive PE = (maximum annual bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (1-CapE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.061 lb PE/ton grain); and

CapE = capture efficiency (99%).

g) Miscellaneous Requirements

(1) None.

5. F008, Loadout #1 - Tr/R

Operations, Property and/or Equipment Description:

Loadout and shipping by truck and rail #1 controlled by baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible emissions from the stack of the baghouse serving emissions units F005, F007, and F008 shall not exceed twenty percent opacity as a six-minute average.
b.	OAC rule 3745-17-07(B)	See b)(2)a. below.
c.	OAC rule 3745-17-08(A)(1)	See b)(2)b. below.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008, shall not exceed 15.3 pounds per hour, based upon Figure II of OAC rule 3745-17-11.
e.	OAC rule 3745-31-05(A)(3) (Best Available Technology for PE)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average. Particulate emissions shall not exceed 16.1 pounds per hour and 3.66 tons per year. See b)(2)c. and b)(2)d. below.

(2) Additional Terms and Conditions

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

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c. The emissions from the loadout operations associated with this emissions unit shall be vented to a baghouse at all times when the emission unit is in operation.

d. The hourly and annual emissions limitations were established to reflect the controlled potential-to-emit for each pollutant for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

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 emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and for any visible particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008. 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 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)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer

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

e) Reporting Requirements

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

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

(3) The permittee shall identify the following information in the PER in accordance with the monitoring requirements for visible emissions in term d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving emissions units F005, F007, and F008;

b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

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. <u>Emission Limitations:</u>

Visible emissions from the stack of the baghouse serving emissions units F005, F007, and F008 shall not exceed twenty percent opacity as a six-minute average.

Visible emissions from fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

<u>Applicable Compliance Method:</u>

If required, compliance with the limitations of visible emissions shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitation:

Particulate emissions from the stack of the baghouse serving emissions units F005, F007, and F008, shall not exceed 15.3 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined based on the following equations:

Stack PE = $Emissions_{F005}$ + $Emissions_{F007}$ + $Emissions_{F008}$; where

$Emissions_{F005}$ = (bushels grain received * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.035 lb PE/ton grain); and

CapE = capture efficiency (80%);

ConE = control efficiency (99%); and

$Emissions_{F007}$ = (bushels grain handled * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.061 lb PE/ton grain); and

CapE = capture efficiency (99%); and

ConE = control efficiency (99%);

$Emissions_{F008}$ = (bushels grain loaded out * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain); and

CapE = capture efficiency (80%); and

ConE = control efficiency (99%);

If required, compliance with the emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation:

Particulate emissions shall not exceed 16.1 lb/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by the following equations:

Total PE = Stack PE + Fugitive PE; where

Stack PE = (maximum hourly bushels of grain loaded out * 60 lb grain/bu grain) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

Maximum hourly bushels of grain loaded out = 40,000 bushels per hour;

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain);

CapE = capture efficiency (80%); and

ConE = control efficiency (99%); and

Fugitive PE = (maximum hourly bushels of grain loaded out) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (1-CapE); where,

Maximum hourly bushels of grain loaded out = 40,000 bushels per hour

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain); and

CapE = capture efficiency (80%).

If required, compliance with the emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emissions Limitation:

Particulate emissions shall not exceed 3.66 ton/yr.

Applicable Compliance Method:

The annual PE limitation was established based on the maximum potential grain throughput of 13,656,000 bushels using the following equations:

Total PE = Stack PE + Fugitive PE; where

Stack PE = (maximum annual bushels of grain loaded out) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (CapE) * (1-ConE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain);

CapE = capture efficiency (80%); and

ConE = control efficiency (99%); and

Fugitive PE = (maximum annual bushels of grain loaded out) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) * (1-CapE) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain); and

CapE = capture efficiency (80%).

g) Miscellaneous Requirements

(1) None.

6. F009, Loadout #2 - Tr

Operations, Property and/or Equipment Description:

Uncontrolled loadout and shipping by truck #2

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a. below.
b.	OAC rule 3745-17-08(A)(1)	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3) (Best Available Technology for PE)	Visible emissions from fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average. Particulate emissions shall not exceed 77.4 pounds per hour and 17.62 tons per year. See b)(2)c. below.

(2) Additional Terms and Conditions

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

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c. The hourly and annual emissions limitations were established to reflect the potential-to-emit for each pollutant for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

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 of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 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)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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

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

(3) The permittee shall identify the following information in the PER in accordance with the monitoring requirements for visible emissions in term d)(1) above:

a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

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. <u>Emission Limitation</u>

Visible emissions from fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

<u>Applicable Compliance Method</u>

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. <u>Emissions Limitation:</u>

PE shall not exceed 77.4 lb/hr.

<u>Applicable Compliance Method:</u>

Compliance with the hourly PE limitation shall be demonstrated by the following equation:

PE = (maximum hourly bushels of grain loaded out) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF); where,

Maximum hourly bushels of grain loaded out = 10,000 bushels per hour; and

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain)

c. Emissions Limitation:

PE shall not exceed 17.62 ton/yr.

Applicable Compliance Method:

The annual PE limitation was established based on the maximum potential grain throughput of 13,656,000 bushels using the following equation:

PE = (maximum annual bushels of grain received) * ((60 lb grain/bu grain) / (2,000 lb/ton)) * (EF) / (2,000 lb/ton); where,

EF = AP-42, Section 9.9.1, Table 9.9.1-1 emissions factor (0.086 lb PE/ton grain)

g) Miscellaneous Requirements

(1) None.

7. F010, Paved/Unpaved Roads

Operations, Property and/or Equipment Description:

Paved and Unpaved Roadways

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07	See b)(2)a. below.
b.	OAC rule 3745-17-08	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)	Visible emissions from any paved roadway or parking area from this emissions unit shall not exceed zero percent opacity, except during a period of time not to exceed six minutes during any sixty minute observation period. Visible emissions from any unpaved roadway or parking area from this emissions unit shall not exceed zero percent opacity, except during a period of time not to exceed thirteen minutes during any sixty minute observation period. Particulate emissions shall not exceed 33.0 tons per year.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)c. through b)(2)h. below.

(2) Additional Terms and Conditions

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

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

f. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such

material has been deposited by trucking or earth moving equipment or erosion by water or other means.

g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

h. The annual emissions limitation was established to reflect the potential-to-emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

roadways and parking areas	minimum inspection frequency
all roads and parking areas	daily

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

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

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures; and

c. the dates the control measures were implemented.

e) Reporting Requirements

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

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

f) Testing Requirements

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

a. Emissions Limitation:

Visible emissions from any paved roadway or parking area from this emissions unit shall not exceed zero percent opacity, except during a period of time not to exceed six minutes during any sixty minute observation period.

Visible emissions from any unpaved roadway or parking area from this emissions unit shall not exceed zero percent opacity, except during a period of time not to exceed thirteen minutes during any sixty minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitation:

Particulate emissions shall not exceed 33.0 tons per year.

Applicable Compliance Method:

Compliance with this limitation may be determined using the following equations provided in AP-42, Fifth Edition, Volume 1, Sections 13.2.1 (revised 1/2011) and 13.2.2 (revised 11/2006):

PE = emissions from paved roadways + emissions from unpaved roadways, where;

Emissions from paved roadways = $[k(sL)^{0.91} (W)^{1.02}]$; where,

k= particle size multiplier (0.011)
sL= silt content of paved road surface material (0.40 g/m^2)
W = mean vehicle weight (27 tons)

Annual particulate emissions are determined by multiplying the size-specific emissions factor determined above (0.14 lb PE/ VMT) by the actual VMT and divided by 2,000 lb/ton. In accordance with the information provided in the permit application, VMT is 0.75 miles per truck, and trucks per year is 47,040 on paved roads; and

Emissions from unpaved roadways = $[k(s/12)^a * (W/3)^b]$; where,

k = particle size multiplier (4.9)
s = silt content of unpaved road surface (13.5%)
a = empirical constant (0.70)
W = mean vehicle weight (27 tons)
b = empirical constant (0.45)

Annual particulate emissions are determined by multiplying the size-specific emissions factor determined above (0.57 lb PE/ VMT) by the actual VMT and divided by 2,000 lb/ton. In accordance with the information provided in the permit application, VMT is 0.75 miles per truck, and trucks per year is 47,040 on unpaved roads.

g) Miscellaneous Requirements

(1) None.