



State of Ohio Environmental Protection Agency

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STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Ross County
Application No: 06-5482

CERTIFIED MAIL

July 15, 1998

ADM/COUNTRYMARK
CHRISTOPHER R JANICK
P O BOX 1470
DECATUR, IL 62525

CORRECTED COPY

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC
ADM/COUNTRYMARK



Permit to Install Terms and Conditions

Application No. 06-5482
APS Premise No. 0671010095
Permit Fee: \$2000.00

Name of Facility: ADM/COUNTRYMARK

Person to Contact: CHRISTOPHER R JANICK

Address: P O BOX 1470
DECATUR, IL 62525

Location of proposed source(s): 331 S WATT P O 1608
CHILLICOTHE, OHIO

Description of proposed source(s):
COLUMN GRAIN DRYER AND STORAGE BIN WITH ENCLOSED CONVEYING E
QUIPMENT.

Date of Issuance: July 15, 1998

Effective Date: July 15, 1998

The above named entity is hereby granted a permit to install for the above described source(s) 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 above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that, if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R. Schreyer

Director

2 of 13 Pages

Facility Name: **ADM/COUNTRYMARK**

Application Number: **06-5482**

Date: **July 15, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

3 of 13 Pages

Facility Name: **ADM/COUNTRYMARK**

Application Number: **06-5482**

Date: **July 15, 1998**

Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

4 of 13 Pages

Facility Name: **ADM/COUNTRYMARK**

Application Number: **06-5482**

Date: **July 15, 1998**

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

5 of 13 Pages

Facility Name: **ADM/COUNTRYMARK**

Application Number: **06-5482**

Date: **July 15, 1998**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **ADM/COUNTRYMARK** located in **Ross** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
F006	Column grain dryer	Column plate perforations less than 0.094 inch	3745-31-05	Column plate perforations less than 0.094 inch, 5.15 pound/hour and 5.4 TPY PM ₁₀ emissions, 20.61 pounds/hour and 21.6 TPY of PM emissions, 5.73 pounds per hour and 22.92 tons per year of NO _x emissions, 1.43 pounds per hour and 5.72 tons per year of CO emissions, 0.02 pound per hour and 0.08 ton per year of SO ₂ emissions, 0.11 pound per hour and 0.44 ton per year of OC emissions, Visible emissions of fugitive particulate matter from the column dryer

Facility Name: **ADM/COUNTRYMARK**Application Number: **06-5482**Date: **July 15, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
F006 Cont'd				shall not exceed 0 percent opacity.
F007	0.5 million bushel storage bin with enclosed conveying equipment	Enclosures, mineral oil application, and other reasonably available methods shall be employed as necessary, in order to minimize or eliminate, at all times, the visible emissions of fugitive dust.	3745-31-05	Enclosures, mineral oil application, and other reasonably available methods shall be employed as necessary, in order to minimize or eliminate, at all times, the visible emissions of fugitive dust. 1.17 pounds/hour and 1.2 TPY of PM ₁₀ emissions, 4.68 pounds/hour and 4.9 TPY of PM emissions, Visible emissions of fugitive particulate matter from the conveying and storage operations shall not exceed 20 percent opacity as a 3-minute average.

Facility Name: **ADM/COUNTRYMARK**

Application Number: **06-5482**

Date: **July 15, 1998**

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	26.5
PM ₁₀	6.6
NO _x	22.92
CO	5.72
SO ₂	0.08
OC	0.44

CONSTRUCTION STATUS

The **Ohio EPA, Southeast District Office** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **F006 and F007**.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138**.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

8 of 13 Pages

Facility Name: **ADM/COUNTRYMARK**

Application Number: **06-5482**

Date: **July 15, 1998**

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Introduction

1. The purpose of this permit to install is to authorize the installation of a new column grain dryer and a 0.5 million bushel storage bin with enclosed conveying equipment.

B. Applicable Emission Limitations and/or Control Requirements
(Also See Air Emission Summary)

1. Emissions Unit F006 - natural gas-fired column grain dryer
 - a. PM₁₀ emissions from column dryer operations shall not exceed 5.15 pounds per hour and 5.4 tons per year. Particulate matter emissions from column dryer operations shall not exceed 20.61 pounds per hour and 21.6 tons per year.
 - b. NO_x emissions from column dryer operations shall not exceed 5.73 pounds per hour and 22.92 tons per year.
 - c. CO emissions from column dryer operations shall not exceed 1.43 pounds per hour and 5.72 tons per year.
 - d. SO₂ emissions from column dryer operations shall not exceed 0.02 pound per hour and 0.08 ton per year.
 - e. OC emissions from column dryer operations shall not exceed 0.11 pound per hour and 0.44 ton per year.
 - f. Visible emissions of fugitive particulate matter from the column dryer shall not exceed 0 percent opacity.
 - g. Fugitive particulate matter emissions from the column dryer shall be controlled by the enclosure of the dryer with perforated sheets in which the perforations do not exceed 0.078 inch.
2. Emissions Unit F007 - 0.5 million bushel storage bin with enclosed conveying equipment
 - a. Particulate matter emissions from 0.5 million bushel storage bin with enclosed conveying equipment shall not exceed 4.9 tons per year.
 - b. PM₁₀ emissions from grain conveying operations shall not exceed 4.9 tons per year.
 - c. Visible emissions of fugitive particulate matter from the grain conveying operations shall not exceed 20 percent opacity as a 3-minute average.
 - d. The permittee shall minimize and/or eliminate particulate matter emissions resulting from conveying and storage operations through

utilization of total enclosure of all equipment associated with these operations, mineral oil application, and other reasonably available methods.

C. Operational Restrictions

1. Emissions Unit F006 - natural gas-fired grain dryer
 - a. The maximum annual throughput for this emissions unit shall not exceed 225,225 tons of grain.
 - b. The permittee shall be restricted to burning only natural gas in this emissions unit.
2. Emissions Unit F007 - 0.5 million bushel storage bin with enclosed conveying equipment
 - a. The maximum annual throughput for grain conveyed (associated with F002) shall not exceed 225,225 tons of grain.

D. Monitoring and/or Recordkeeping Requirements

1. Emissions Unit F006 - column grain dryer with natural gas dryer
 - a. The permittee shall maintain monthly records of the amount of grain processed through this emissions unit. In conjunction with the above, the permittee shall calculate at the end of each month, the total, year to date, amount of grain processed through this emissions unit.
 - b. The permittee shall maintain records of the amount of natural gas combusted in this emissions unit.
2. Emissions Unit F007 - 0.5 million bushel storage bin with enclosed conveying equipment
 - a. The permittee shall maintain monthly records of the amount of grain processed through this emissions unit. In conjunction with the above, the permittee shall calculate at the end of each month, the total, year to date, amount of grain processed through this emissions unit.

E. Reporting Requirements

1. The permittee shall submit material throughput deviation (excursion) reports for each emissions unit. The material throughput deviation (excursion) reports shall identify all periods of time during which the material throughput per emissions unit did not comply with the

allowable limit specified above. If no deviations occurred during a calendar quarter, a quarterly report shall be submitted which states that no deviations occurred during that quarter. The reports shall be submitted which state 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 shall cover the previous calendar quarters.

F. Testing Requirements/Compliance Method Determinations

1. Testing Requirements

None required.

Compliance Method Determination

Compliance with the emissions limitations of this permit shall be determined in accordance with the following methods:

2. For grain column dryer operations (Emissions Unit F006)

a. Emission Limitation

5.15 pounds PM₁₀/hour and 5.4 tons PM₁₀/year

Applicable Compliance Method

Compliance shall be determined using calculations, based on AP-42 emission factors (0.043 pound PM₁₀/ton of grain dried), the maximum hourly throughput of the emission unit (225,225 tons/year).

b. Emission Limitation

20.61 pounds PM/hour and 21.6 tons PM/year

Applicable Compliance Method

Compliance shall be determined using calculations based on AP-42 emission factors (0.172 pound PM/ton of grain dried), the maximum hourly and annual throughput of the emission unit (225,225 tons/year).

c. Emission Limitation

5.73 pounds NO_x/hour and 22.92 tons NO_x/year

Applicable Compliance Method

Compliance shall be determined using calculations based on AP-42 emission factors (140 pounds NO_x/10⁶

ft³ natural gas combusted), the maximum hourly and annual amount of natural gas combusted in this emission unit (328 10⁶ ft³).

d. Emission Limitation

1.43 pounds CO/hour and 5.72 tons CO/year

Applicable Compliance Method

Compliance shall be determined using calculations based on AP-42 emission factors (35 pounds CO/10⁶ ft³ natural gas combusted), the maximum hourly and annual amount of natural gas combusted in this emission unit (328 10⁶ ft³).

e. Emission Limitation

0.02 pound SO₂/hour and 0.08 ton SO₂/year

Applicable Compliance Method

Compliance shall be determined using calculations based on AP-42 emission factors (0.6 pound SO₂/10⁶ ft³ natural gas combusted), the maximum hourly and annual amount of natural gas combusted in this emission unit (328 10⁶ ft³).

f. Emission Limitation

0.11 pound OC/hour and 0.44 ton OC/year

Applicable Compliance Method

Compliance shall be determined using calculations based on AP-42 emission factors (2.8 pounds OC/10⁶ ft³ natural gas combusted), the maximum hourly and annual amount of natural gas combusted in this emission unit (328 10⁶ ft³).

g. Emission Limitation

0 percent opacity

Applicable Compliance Method

Compliance with the visible emission limitations shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

2. Emissions Unit F007- 0.5 million bushel storage bin with enclosed conveying equipment.

13 of 13 Pages

Facility Name: **ADM/COUNTRYMARK**

Application Number: **06-5482**

Date: **July 15, 1998**

a. Emission Limitation

ton PM/year

Applicable Compliance Method

Compliance shall be determined using calculations, based on AP-42 emission factors (0.039 pound PM/ton of grain), the maximum annual throughput of the emissions unit (225,225 tons/year).

b. Emission Limitation

20 percent opacity, as a three minute average

Applicable Compliance Method

Compliance with the visible emission limitations shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.