

Facility ID: 1431073204 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431073204 Emissions Unit ID: P901 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - animal feed additive transfer, conveying & railcar unloading with enclosed conveyers and controlled by fabric filter	OAC rule 3745-31-05(A)(3) (PTI 14-05525)	Particulate emissions (PE) shall not exceed 7.45 lbs/hour and 32.6 tons/year*. Particulate Matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.75 lbs/hour and 3.3 tons/year*. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B)(3).
	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)(3)	*The hourly and annual emission limitations are based on the emissions unit's Potential to Emit, therefore no hourly and annual records are required to demonstrate compliance with these limitations. See term A.2.b. See term A.2.c. Particulate emissions (PE) shall not exceed 0.030 grains PM/dry standard cubic foot.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
 - (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a totally enclosed conveying system and a retractable load shoot vented to a baghouse with a 99% control efficiency and mass and visible emission limitations.
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
Fugitive visible particulate emissions shall not exceed 20 percent opacity as a three- minute average, except as specified by rule.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping 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. 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 emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

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

D. Reporting Requirements

- 1. The permittee shall submit annual written report that (a) identifies 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) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous 12-month period.
- 2. The permittee shall submit annual written report that (a) identifies all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous 12-month period.

E. Testing Requirements

- 1. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity as a three- minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

- 2. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Particulate emissions (PE) shall not exceed 7.45 lbs/hour.

Particulate Matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.75 lbs/hour.

Applicable Compliance Methods:

Particulate emissions were calculated using the following calculations:

$7.45 \text{ lbs/hr PE} = 5.0 \text{ lbs/hr (Fugitive PE from conveying \& transfer)} + 0.95 \text{ lb/hr (PE from the fabric filter from conveying \& transfer)} + 1.5 \text{ lbs/hr (PE from railcar unloading)}$

The individual calculations are as follows:

Fugitive PE from conveying and transfer = $50 \text{ tons/hr (maximum production rate)} \times 2 \text{ lbs of PE/hr (RACM emission factor from table 2.1.3-2)} \times (1-.95)^* = 5 \text{ lbs/hr of fugitive PE.}$

PE from fabric filter from conveying and transfer = $50 \text{ tons/hr (maximum production rate)} \times 2 \text{ lbs of PE/hr (RACM emission factor from table 2.1.3-2)} \times (1-.05)^* \times (1-.99)** = 0.95 \text{ lb/hr of PE from fabric filter.}$

PE from railcar unloading = $50 \text{ tons/hr (maximum production rate)} \times 3 \text{ lbs of PE/hr (RACM emission factor from table 2.1.3-1)} \times (1-.99)** = 1.5 \text{ lbs/hr of PE from railcar unloading.}$

* capture efficiency = 95% captured, 5% goes to fabric filter

** control efficiency of fabric filter = 99%

PM10 emissions are 10% of total PE = $7.45 \text{ lbs of PE/hr} \times 0.1 \text{ lbof PM10/lb of PE} = 0.75 \text{ lb of PM10/hr.}$

3. Emission Limitation:

Particulate emissions (PE) shall not exceed 32.6 TPY.

Particulate Matter emissions 10 microns and less in diameter (PM10) shall not exceed 3.3 tons/year.

Applicable Compliance Methods:

Annual PE and PM10 emissions are calculated by taking the hourly emissions and multiplying by 8760 hours and then dividing by 2000 lbs.

4. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

0.030 grains of PE/dry standard cubic foot.

Applicable Compliance Method:

If required, compliance shall be determined by using Methods 1-5 of 40 CFR Part 60, Appendix A.

F. **Miscellaneous Requirements**

1. None