



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

8/14/2008

Mr. Bill Pearson
Kraft Foods Global, Inc. - Toledo Flour Mill
2221 Front Street
Toledo, OH 43605

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448010023
Permit Number: 04-01488
Permit Type: Initial Installation
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final 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.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: TDES

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
Kraft Foods Global, Inc. - Toledo Flour Mill**

Facility ID: 0448010023
Permit Number: 04-01488
Permit Type: Initial Installation
Issued: 8/14/2008
Effective: 8/14/2008
Expiration: 8/14/2018



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Kraft Foods Global, Inc. - Toledo Flour Mill

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Final Permit-to-Install and Operate
Permit Number: 04-01488
Facility ID: 0448010023
Effective Date: 8/14/2008

Authorization

Facility ID: 0448010023
Application Number(s): A0005390
Permit Number: 04-01488
Permit Description: white wheat system.
Permit Type: Initial Installation
Permit Fee: \$0.00
Issue Date: 8/14/2008
Effective Date: 8/14/2008
Expiration Date: 8/14/2018
Permit Evaluation Report (PER) Annual Date: Feb 15, for Jan 1 - Dec 31
This document constitutes issuance to:

Kraft Foods Global, Inc. - Toledo Flour Mill
2221 Front Street
Toledo, OH 43605

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 04-01488

Facility ID: 0448010023

Effective Date: 8/14/2008

Authorization (continued)

Permit Number: 04-01488

Permit Description: white wheat system.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	F011
Company Equipment ID:	Line 6 white wheat process
Superseded Permit Number:	.
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F012
Company Equipment ID:	Line 6 white wheat truck and railcar loading
Superseded Permit Number:	.
General Permit Category and Type:	Not Applicable



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Permit Number: 04-01488

Facility ID: 0448010023

Effective Date: 8/14/2008

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 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 Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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



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Division of Air Pollution Control

Final Permit-to-Install and Operate

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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.



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Final Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 04-01488

Facility ID: 0448010023

Effective Date: 8/14/2008

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.



State of Ohio Environmental Protection Agency
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Final Permit-to-Install and Operate

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Effective Date: 8/14/2008

C. Emissions Unit Terms and Conditions



1. F011, Line 6 white wheat process

Operations, Property and/or Equipment Description:

Screening and cleaning, transferring and conveying; Line 6 white wheat process

- 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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from this emissions unit shall not exceed 0.065 pound per hour PE from this emissions unit shall not exceed 0.29 ton per rolling, 12-month period particulate matter of 10 microns or less in diameter (PM10) from this emissions unit shall not exceed 0.034 pound per hour PM10 from this emissions unit shall not exceed 0.15 ton per rolling, 12-month period see b)(2)a. thru b)(2)e.
b.	OAC rule 3745-17-07(B)(1)	the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-31-05(A)(3)
c.	OAC rule 3745-17-08(B)	see b)(2)e.
d.	40 CFR Part 60 subpart DD	<p>particulate emissions from any stack serving this emissions unit shall not exceed 0.023 g/dscm (0.01 gr/dscf) (40 CFR 60.302(b)(1))</p> <p>visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity as a 6-minute average (40 CFR 60.302(b)(2))</p> <p>visible fugitive particulate emissions from any egress serving this emissions unit shall not exceed 0% opacity as a 6-minute average (40 CFR 60.302(c)(2))</p>

(2) Additional Terms and Conditions

- a. The hourly emission limitations were established to reflect the enforceable potential to emit for this emissions unit based on a maximum of 36 tons wheat processed per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- b. The annual emission limitations were established to reflect the federally enforceable potential to emit for this emissions unit based on 731,000 tons wheat processed per year (the maximum capacity of the white wheat screening and cleaning equipment). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- c. The requirements of this rule also include compliance with the requirements of OAC 3745-17-08(B) and NSPS DD.
- d. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

material handling operation(s)

white wheat screening and cleaning

control measure(s)

full enclosure with a fabric filtration system exhausting to the enclosed space



white wheat transfer and conveying

full enclosure with a fabric filtration system exhausting to the enclosed space

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- e. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

c) Operational Restrictions

- (1) The permittee shall operate all fabric filters associated with the active portions of this emissions unit whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process was in operation.
- (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 any stack serving this emissions unit and for any visible fugitive particulate emissions 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.



Note: the observer performing the visible emissions observations is not required to be certified in 40 CFR Part 60, Appendix A test procedures.

- (3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation;

visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity, as a six minute average; visible fugitive particulate emissions from any egress point serving this emissions unit shall not exceed 0% opacity as a 6-minute average

Applicable Compliance Method;

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303.

b. Emission Limitation:

PE from any stack serving this emissions unit shall not exceed 0.023 g/dscm (0.01 gr/dscf)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in 40 CFR 60.303.

c. Emission Limitation:

PE from this emissions unit shall not exceed 0.065 pound per hour



Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1 2 dated 3/03, as follows:

for screening and cleaning - multiply the emission factor of 0.12 pound of PE emissions per ton of grain (assuming 90% efficient control with a cyclone) by the maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and by one minus the control efficiency (1-0.99);

and to this add:

for transferring and conveying - multiply the emission factor of 0.061 pound of PE emissions per ton of grain (assuming 90% efficient control with a cyclone) by the maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745 17 03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

PE shall not exceed 0.29 ton per rolling, 12-month period

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit operating at 8,760 hours per year. Therefore, provided compliance is shown with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

PM10 from this emissions unit shall not exceed 0.034 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows:

for screening and cleaning - multiply the emission factor of 0.06 pound of PM10 emissions per ton of grain (assuming 90% efficient control with a cyclone) by the maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);



and to this add:

for transferring and conveying - multiply the emission factor of 0.034 pound of PE emissions per ton of grain (assuming 90% efficient control with a cyclone) by the maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);

If required, the permittee shall demonstrate compliance with the emission factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

PM10 shall not exceed 0.15 ton per rolling, 12-month period

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit operating at 8,760 hours per year. Therefore, provided compliance is shown with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days of final issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the visible fugitive particulate emissions limitation from the stack and any egress serving this emissions unit, and the stack mass PE concentration and hourly emission limitation.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):

Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A using the methods and procedures of 40 CFR 60.303.

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

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval



prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

Note: This emissions testing protocol is based on the assumption of 100% capture of all potential fugitive emissions and the return of the uncontrolled emissions to the capture enclosure. Based on the reported results of this test, additional stack testing may be required, including but not limited to Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A and Methods 201, 202 and 204 of 40 CFR Part 51, Appendix M.

- g) Miscellaneous Requirements
 - (1) None.



2. F012, Line 6 white wheat truck and railcar loading

Operations, Property and/or Equipment Description:

Truck and railcar loading; Line 6 white wheat process

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	during the loading of railcars; particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.009 pound per hour particulate matter of 10 microns or less in diameter (PM10) from the stack serving this emissions unit shall not exceed 0.001 pound per hour
		during the loading of trucks; PE from the stack serving this emissions unit shall not exceed 0.12 pound per hour fugitive PE from this emissions unit shall not exceed 0.24 pound per hour PM10 from the stack serving this emissions unit shall not exceed 0.04 pound per hour



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		fugitive PM10 from this emissions unit shall not exceed 0.08 pound per hour
		<p>PE from this emissions unit shall not exceed 0.36 ton per rolling, 12-month period</p> <p>PM10 from this emissions unit shall not exceed 0.12 ton per rolling, 12-month period</p> <p>see b)(2)a. thru b)(2)e.</p>
b.	OAC rule 3745-17-07(B)(1)	the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
c.	OAC rule 3745-17-08(B)	see b)(2)e.
d.	40 CFR Part 60 subpart DD	<p>particulate emissions from any stack serving this emissions unit shall not exceed 0.023 g/dscm (0.01 gr/dscf) (40 CFR 60.302(b)(1))</p> <p>visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity as a 6-minute average (40 CFR 60.302(b)(2))</p> <p>visible fugitive particulate emissions from the railcar loading station shall not exceed 5% opacity as a 6-minute average (40 CFR 60.302(c)(1))</p> <p>visible fugitive particulate emissions from the truck loading station shall not exceed 10% opacity as a 6-minute average (40 CFR 60.302(c)(3))</p> <p>visible fugitive particulate emissions any other egress serving this emissions unit (i.e., any egress serving the baghouse discharge) shall not exceed 0% opacity as a 6-minute average (40 CFR 60.302(b)(2))</p>



(2) Additional Terms and Conditions

- a. The hourly emission limitations were established to reflect the enforceable potential to emit for this emissions unit based on a maximum of 32.4 tons of cleaned wheat produced per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- b. The annual emission limitations were established to reflect the federally enforceable potential to emit for this emissions unit based on 283,000 tons of cleaned wheat produced per year (the maximum production capacity of the white wheat screening and cleaning equipment of F011). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- c. The requirements of this rule also include compliance with the requirements of OAC 3745-17-08(B) and NSPS DD.
- d. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

material handling operation(s)

control measure(s)

rail car loadout

a sealed, screw conveyor shall be fitted over the top of the slot in the railcars, completely enclosing the railcar opening while negative pressure is maintained by an integral fabric filter based dust collection system, where the return of the uncontrolled stack emissions is to the building enclosing emissions unit F011

truck loadout

adequate enclosure and operation of a shrouded telescopic loading arm(s) with an integral dust collection system providing an inherent capture efficiency of 98% and a minimum control efficiency of 99%.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- e. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

c) Operational Restrictions

- (1) The permittee shall operate all appropriate fabric filters associated with this emissions unit whenever that section of this emissions unit is in operation.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the fabric filter was not in service when this process was in operation.
- (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 any stack serving this emissions unit and for any visible fugitive particulate emissions 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.

Note: the observer performing the visible emissions observations is not required to be certified in 40 CFR Part 60, Appendix A test procedures.

- (3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date



identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

visible emissions from any stack serving this emissions unit shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303.

b. Emission Limitation:

visible fugitive emissions from the railcar loading station shall not exceed 5% opacity, as a six-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303.

c. Emission Limitation:

visible fugitive particulate emissions from the truck loading station shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method;

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303.

d. Emission Limitation:

PE from any stack serving this emissions unit shall not exceed 0.023 g/dscm (0.01 gr/dscf)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in 40 CFR 60.303.



e. Emission Limitation:

during the loading of railcars, PE from the stack serving this emissions unit shall not exceed 0.009 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows: multiply the uncontrolled emission factor of 0.027 pound of PE emissions per ton of grain by the maximum hourly rate of grain processing in this emissions unit (32.4 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99).

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

during the loading of trucks, PE from the stack serving this emissions unit shall not exceed 0.12 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows: multiply the uncontrolled emission factor of 0.086 pound of PE emissions per ton of grain by the maximum hourly rate of grain processing in this emissions unit (32.4 tons wheat) by the capture efficiency (0.98), and one minus the control efficiency (1-0.99).

If required, the permittee shall demonstrate compliance with the emissions factor through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

during the loading of trucks, fugitive PE from this emissions unit shall not exceed 0.24 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as



follows: multiply the uncontrolled emission factor of 0.086 pound of PE emissions per ton of grain by the maximum hourly rate of grain processing in this emissions unit (32.4 tons wheat) by one minus the capture efficiency (1-0.98);

If required, the permittee shall demonstrate compliance with the emissions factor through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A and 204 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation:

PE shall not exceed 0.36 ton per rolling, 12-month period

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit while loading trucks and operating at 8,760 hours per year. Therefore, provided compliance is shown with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

during the loading of railcars, PM10 from the stack serving this emissions unit shall not exceed 0.001 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows: multiply the uncontrolled emission factor of 0.0022 pound of PM10 emissions per ton of grain by the maximum hourly rate of grain processing in this emissions unit (32.4 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);

If required, the permittee shall demonstrate compliance with the emission factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

j. Emission Limitation:

during the loading of trucks, PM10 from the stack serving this emissions unit shall not exceed 0.04 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows: multiply the uncontrolled emission factor of 0.029 pound of PM10 emissions per ton of grain by the maximum hourly rate of grain processing in this



emissions unit (32.4 tons wheat) by the capture efficiency (0.98), and one minus the control efficiency (1-0.98).

If required, the permittee shall demonstrate compliance with the emission factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

k. Emission Limitation:

during the loading of trucks, fugitive PE from this emissions unit shall not exceed 0.08 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows: multiply the uncontrolled emission factor of 0.029 pound of PM10 emissions per ton of grain by the maximum hourly rate of grain processing in this emissions unit (32.4 tons wheat) by one minus the capture efficiency (1-0.98).

If required, the permittee shall demonstrate compliance with the emission factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and 204 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitation:

PM10 shall not exceed 0.12 ton per rolling, 12-month period

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit while loading trucks and operating at 8,760 hours per year. Therefore, provided compliance is shown with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days of issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the visible fugitive particulate emissions limitation from the stack and any egress serving this emissions unit (including the wheat load-out station and the building enclosing the fabric filter discharge), and the stack mass PE concentration and hourly emission limitation.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):



Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A using the methods and procedures of 40 CFR 60.303.

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

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

Note: Based on the reported results of this test, additional stack testing may be required, including but not limited to Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A and Methods 201, 202 and 204 of 40 CFR Part 51, Appendix M.

g) Miscellaneous Requirements

- (1) None.