



State of Ohio Environmental Protection Agency

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

2/25/2009

Andy Bishop
KALMBACH FEEDS, INC.
7148 SR 199 N
Upper Sandusky, OH 43351

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0388010049
Permit Number: P0087988
Permit Type: Renewal
County: Wyandot

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	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 Ohio EPA DAPC, Northwest District Office. 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: Ohio EPA-NWDO

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
KALMBACH FEEDS, INC.**

Facility ID: 0388010049
Permit Number: P0087988
Permit Type: Renewal
Issued: 2/25/2009
Effective: 2/25/2009
Expiration: 2/25/2014



Air Pollution Permit-to-Install and Operate
for
KALMBACH FEEDS, INC.

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Permit Number: P0087988
Facility ID: 0388010049
Effective Date: 2/25/2009

Authorization

Facility ID: 0388010049
Application Number(s): A0019097
Permit Number: P0087988
Permit Description: FEPTIO Renewal for Truck and Rail Receiving, Boiler, Grinders, Pelletizing Systems and a Grain Dryer
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 2/25/2009
Effective Date: 2/25/2009
Expiration Date: 2/25/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

KALMBACH FEEDS, INC.
7148 SR 199 N
PO BOX 38
UPPER SANDUSKY, OH 43351

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:

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

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



Authorization (continued)

Permit Number: P0087988
Permit Description: FEPTIO Renewal for Truck and Rail Receiving, Boiler, Grinders, Pelletizing Systems and a Grain Dryer

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

Emissions Unit ID:	B001
Company Equipment ID:	Boiler
Superseded Permit Number:	03-13584
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F001
Company Equipment ID:	Rail Receiving
Superseded Permit Number:	03-1330
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Bulk Loadout
Superseded Permit Number:	03-1330
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Mineral Receiving
Superseded Permit Number:	03-1330
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Grinder #1
Superseded Permit Number:	03-1330
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Grinder #2
Superseded Permit Number:	03-1330
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Pellet System #3
Superseded Permit Number:	03-16095
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Pellet System #4
Superseded Permit Number:	03-16095
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Bagging
Superseded Permit Number:	03-1330
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Grain Dryer
Superseded Permit Number:	03-14043
General Permit Category and Type:	Not Applicable



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Permit Number: P0087988

Facility ID: 0388010049

Effective Date: 2/25/2009

Group Name: Pellet System 1, 2

Emissions Unit ID:	P004
Company Equipment ID:	Pellet System #1
Superseded Permit Number:	03-16095
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Pellet System #2
Superseded Permit Number:	03-16095
General Permit Category and Type:	Not Applicable



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Final Permit-to-Install and Operate

Permit Number: P0087988

Facility ID: 0388010049

Effective Date: 2/25/2009

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 Ohio EPA DAPC, Northwest District Office 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0087988

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Effective Date: 2/25/2009

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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Effective Date: 2/25/2009

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: P0087988

Facility ID: 0388010049

Effective Date: 2/25/2009

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.



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C. Emissions Unit Terms and Conditions



1. B001, Boiler

Operations, Property and/or Equipment Description:

12.6 MMBtu per hour boiler

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)	1.80 lbs nitrogen oxides (NOx)/hr and 7.04 tons NOx/yr 0.45 lbs carbon monoxide (CO)/hr and 1.76 tons CO/yr 6.39 lbs sulfur dioxide (SO ₂)/hr, 25.00 tons sulfur dioxide (SO ₂)/yr and 0.507 lbs SO ₂ /MMBtu 0.18 lbs particulate matter (PE)/hr, 0.70 tons PE/hr and 0.014 lbs PE/MMBtu See b)(2)a.
b.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
c.	OAC rule 3745-18-06(D)	See b)(2)b.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule
e.	40 CFR Part 60, Subpart Dc	Monitoring, Record keeping and Reporting Requirements [See d)(3) and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		e)(2) #2 Fuel Oil Content Restrictions [See c)(3)]

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and 40 CFR Part 60, Subpart Dc.
- 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).

c) Operational Restrictions

- (1) The permittee shall burn only number 2 fuel oil in this emissions unit.
- (2) The maximum number 2 fuel oil usage rate in this emissions unit shall not exceed 704,225 gallons per year.
- (3) The permittee shall burn number 2 fuel oil that contains no greater than 0.5 weight percent sulfur.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than number 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the quantity of number 2 fuel oil combusted, in gallons;
 - b. the annual, year-to-date, quantity of number 2 fuel oil combusted (sum of a for each calendar month to date from January to December);
- (3) For each shipment of oil, the permittee shall obtain a fuel supplier certification which includes the following information:
 - a. the name of the oil supplier; and
 - b. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Part 60, section 60.41c.

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.

- (2) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office. The quarterly report shall include copies of the fuel supplier certifications required in section a)(3). The quarterly report shall include a certified statement signed by the permittee that the records of the fuel supplier certifications submitted represent all of the fuel combusted during the quarter.

The initial quarterly report shall be postmarked by the 30th day of the third month following the first shipment of oil received. Each subsequent quarterly report shall be postmarked by the 30th day following the end of the reporting period.

The permittee may make a request to the Ohio EPA to alter the quarterly reporting periods. Such a request must be approved by the Ohio EPA.

- (3) The permittee shall submit annual deviation (excursion) reports that identify all exceedances of the annual number 2 fuel oil usage rate limitation. If no deviations occurred during the calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.

f) Testing Requirements

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

- a. Emission Limitation:
 - 1.80 pounds NO_x/hour
 - 0.45 pounds CO/hour
 - 6.39 pounds SO₂/hour
 - 0.18 pounds PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitations by multiplying the maximum heat input to the boiler (12.6 MMBtu/hour which equates to 90 gallons per hour) by the following AP-42 emission factors from Chapter 1, Table 1.3-1 and Table 1.3-3 (9/98):

NO_x = 20 lb per 1000 gallons

CO = 5 lb per 1000 gallons

SO₂ = (142 lb per 1000 gallons)S where S is the sulfur content of the fuel oil in weight percent

PE = 2 lb per 1000 gallons

If required, the permittee shall demonstrate compliance by emission testing in accordance with the following approved US EPA test methods:



NOx: Methods 1-4 and 7
CO: Methods 1-4 and 10
SO₂: Methods 1-4 and 6
PE: Methods 1-5

- b. Emission Limitation:
25.00 tons SO₂/year
7.04 tons NOx/year
1.76 tons CO/year
0.70 tons PE/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the yearly emission limitations by multiplying the AP-42 emission factors listed in f)(1)a. by a maximum annual fuel usage rate of 704,225 gallons and dividing by 2000 lbs/ton.

- c. Emission Limitation:
0.507 lbs SO₂/MMBtu
0.014 lbs PE/MMBtu

Applicable Compliance Method:

Compliance with the lbs/MMBtu emission limitations shall be demonstrated by multiplying the following emission factors from AP-42 from Chapter 1, Table 1.3-1 and Table 1.3-3 (9/98) dividing by a heat content of 0.14 mmBtu/gal:

SO₂ = (142 lb per 1000 gallons)S where S is the sulfur content of the fuel oil in weight percent

PE = 2 lb per 1000 gallons

If required, the permittee shall demonstrate compliance by emission testing in accordance with the following approved US EPA test methods:

SO₂: Methods 1-4 and 6
PE: Methods 1-5

- d. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average except as provided by rule.

Applicable Compliance Method:

If required compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements for 40 CFR Part 60 are also federally enforceable.



2. F001, Rail Receiving

Operations, Property and/or Equipment Description:

60 tons/hr animal feed receiving (rail)

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)	3.94 tons fugitive particulate emissions (PE)/yr Visible fugitive PE shall not exceed 5% opacity See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
d.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of partial (3-sided) enclosure and compliance with the terms and conditions of this permit.

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



- c. The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- 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 section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.94 tons fugitive PE/yr

Applicable Compliance Method:
The permittee may calculate the actual annual fugitive PE emission rate from this unit utilizing the appropriate AP-42 emission factor from Table 9.9-1 (revised 1/95), the actual annual throughput and the control efficiency provided by the 3-sided enclosure (75 percent).
 - b. Emission Limitation:
Visible fugitive PE shall not exceed 5 percent opacity

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
- g) Miscellaneous Requirements
 - (1) None.



3. F002, Bulk Loadout

Operations, Property and/or Equipment Description:

60 tons/hr bulk loadout

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)	0.70 ton fugitive particulate emissions (PE)/yr Visible fugitive PE shall not exceed 10% opacity See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of partial (3-sided) enclosure and compliance with the terms and conditions of this permit.

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



- c. The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- 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 section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.70 ton fugitive particulate matter (PE)/yr

Applicable Compliance Method:
The permittee may calculate the actual annual fugitive PE emission rate from this unit utilizing the appropriate AP-42 emission factor from Table 9.9-1 (revised 1/95), the actual annual throughput and the control efficiency provided by the 3-sided enclosure (75 percent).
 - b. Emission Limitation:
Visible fugitive PE shall not exceed 5% opacity

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
- g) Miscellaneous Requirements
 - (1) None.



4. P001, Mineral Receiving

Operations, Property and/or Equipment Description:

25 ton/hr mineral receiving (truck) w/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 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)	0.02 lb particulate emissions (PE)/hr and 0.09 ton PE/yr Visible PE shall not exceed 5% opacity, as a six minute average from the baghouse stack See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of a baghouse and compliance with the terms and conditions of this permit.

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



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 2-6 inches of water.

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

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

a. Emission Limitation:
0.02 lb PE/hr

Applicable Compliance Method:

The permittee may calculate the actual hourly PE emission rate from this unit utilizing the appropriate AP-42 emission factor from Table 9.9-1 (revised 1/95), the actual hourly throughput and the control efficiency of the baghouse (100 percent capture, 99 percent control). If required, the permittee shall demonstrate compliance with the hourly limitation through emissions testing performed in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
0.09 ton PE/yr

Applicable Compliance Method:

Compliance with the hourly limit will also demonstrate compliance with the annual limit as the annual limit is based on the hourly limit multiplied by 8760 hours/year.

c. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six minute average from the baghouse stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



5. P002, Grinder #1

Operations, Property and/or Equipment Description:

25 tons/hr Grinder No.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 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)	0.30 lb particulate emissions (PE)/hr and 1.31 tons PE/yr Visible PE shall not exceed 10% opacity, as a six minute average from the cyclone stack See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of a cyclone and compliance with the terms and conditions of this permit.

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



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 2-5 inches of water.

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

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

a. Emission Limitation:
0.30 pound PE/hour

Applicable Compliance Method:

The permittee may calculate the actual hourly PE emission rate from this unit utilizing the appropriate AP-42 emission factor from Table 9.9-1 (revised 1/95), the actual hourly throughput and the control efficiency of the cyclone (100 percent capture, 90 percent control). If required, the permittee shall demonstrate compliance with the hourly limitation through emissions testing performed in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
1.31 tons PE/year

Applicable Compliance Method:

Compliance with the hourly limit will also demonstrate compliance with the annual limit as the annual limit is based on the hourly limit multiplied by 8760 hours/year. If required, compliance with the PE limitation shall be determined in accordance with Method 5, which is located in 40 CFR Part 60, Appendix A.

c. Emission Limitation:
Visible PE shall not exceed 10% opacity, as a six minute average from the cyclone stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



6. P003, Grinder #2

Operations, Property and/or Equipment Description:

30 tons/hr Grinder No.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 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)	0.36 lb particulate emissions (PE)/hr and 1.58 tons PE/yr Visible PE shall not exceed 10% opacity, as a six minute average from the cyclone stack See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of a cyclone and compliance with the terms and conditions of this permit.

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



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 2-5 inches of water.

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

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

a. Emission Limitation:
0.36 pound PE/hour

Applicable Compliance Method:

The permittee may calculate the actual hourly PE emission rate from this unit utilizing the appropriate AP-42 emission factor from Table 9.9-1 (revised 1/95), the actual hourly throughput and the control efficiency of the cyclone (100 percent capture, 90 percent control). If required, the permittee shall demonstrate compliance with the hourly limitation through emissions testing performed in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
1.58 tons PE/year

Applicable Compliance Method:

Compliance with the hourly limit will also demonstrate compliance with the annual limit as the annual limit is based on the hourly limit multiplied by 8760 hours/year.

c. Emission Limitation:
Visible PE shall not exceed 10% opacity, as a six minute average from the cyclone stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



7. Emissions Unit Group - Pellet System 1, 2: P004, P005,

EU ID	Operations, Property and/or Equipment Description
P004	Pellet system 1 – (5 Ton/Hr)
P005	Pellet system 2 – (5 Ton/Hr)

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. b)(1)b.and b)(2)c.

(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. d)(3) - d)(5)

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)	Control requirements [See b)(2)b.] 0.30 lb particulate emissions (PE)/hour and 1.31 tons PE/year Visible PE shall not exceed 10% opacity, as a six-minute average 0.70 lb organic compounds (OC)/hour and 3.07 tons OC/year See b)(2)c.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)a.

(2) Additional Terms and Conditions

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



- b. Best available technology (BAT) control requirements for this emissions unit has been determined to be use of a high efficiency cyclone.
 - c. This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a cyclone to a maximum mass emission rate of 0.30 lb/hr.
- c) Operational Restrictions
- (1) The maximum annual throughput for this emissions unit shall not exceed 43,800 tons of pelletized animal feed.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclone during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the cyclone on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 2-5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved



revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain monthly records of the amount (tons per month and total tons, to date for the calendar year) of pelletized animal feed processed.
- (3) The permit to install for this emissions unit P004 and P005 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol (from P004 and P005 individually)

TLV (mg/m³): 1884.25

Maximum Hourly Emission Rate (lbs/hr): 0.70

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 177.20

MAGLC (ug/m³): 44,863.09

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



- (5) The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the “Air Toxic Policy:”
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

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.
- (2) The permittee shall submit annual reports which identify any exceedances of the annual pelletized animal feed throughput limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year.

f) Testing Requirements

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

- a. Emission Limitations:
0.30 lb PE/hour

Applicable Compliance Method:

The permittee may demonstrate compliance in accordance with the following calculation:

PE will be controlled by a cyclone control system. The cyclone stack will result in an emission rate of 0.30 lb PE/hr as determined in accordance with the following:

$$PE(\text{cyclone stack}) = (EF) (\text{maximum hourly throughput}) = 0.30 \text{ lb PE/hr}$$

where:

EF = emission factor of 0.06 lb PE/ton of material (emission factor based on stack test information)



Maximum hourly throughput = 5 tons of material/hour

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

- b. Emission Limitations:
1.31 tons PE/year

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitations:
0.70 lb OC/hour

Applicable Compliance Method:

The emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on an emission factor of 0.14 lb of OC/ton of material (based on stack test information) and a maximum hourly throughput of 5 tons/hour.

If required, compliance with this limitation shall be based on stack testing using the methods and procedures specified in 40 CFR Part 60, Appendix A- Methods 1-4, and 18, 25 or 25A.

- d. Emission Limitations:
3.07 tons OC/year

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitations:
Visible PE shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- g) Miscellaneous Requirements

- (1) None.



8. P006, Pellet System #3

Operations, Property and/or Equipment Description:

Pellet system 3 – (20 Ton/Hr)

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. b)(1)b.and b)(2)c.

(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. d)(3) – d)(5)

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)	Control requirements [See b)(2)b.] 1.20 lbs particulate emissions (PE)/hour and 5.26 tons PE/year Visible PE shall not exceed 10% opacity, as a six-minute average 2.80 lbs organic compounds (OC)/hour and 12.26 tons OC/year See b)(2)c.
b.	OAC rule 3745-31-05(D)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)a.

(2) Additional Terms and Conditions

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



- b. Best available technology (BAT) control requirements for this emissions unit has been determined to be use of a high efficiency cyclone.
 - c. This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a cyclone to a maximum mass emission rate of 1.20 lbs/hr.
- c) Operational Restrictions
- (1) The maximum annual throughput for this emissions unit shall not exceed 175,200 tons of pelletized animal feed.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclone during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the cyclone on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 2-5 inches of water.

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



this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain monthly records of the amount (tons per month and total tons, to date for the calendar year) of pelletized animal feed processed.
- (3) The permit to install for this emissions unit P006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m³): 1884.25

Maximum Hourly Emission Rate (lbs/hr): 2.80

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 164.0

MAGLC (ug/m³): 44,863.09

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters; the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (5) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the “Air Toxic Policy:”

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

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.
- (2) The permittee shall submit annual reports which identify any exceedances of the annual pelletized animal feed throughput limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year.

f) Testing Requirements

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

- a. Emission Limitation:
1.20 lb PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance in accordance with the following calculation:

PE will be controlled by a cyclone control system. The cyclone stack will result in a emission rate of 1.20 lb PE/hr as determined in accordance with the following:

$$PE(\text{cyclone stack}) = (EF) (\text{maximum hourly throughput}) = 1.20 \text{ lb PE/hr}$$

where:

EF = emission factor of 0.06 lb PE/ton of material (emission factor based on stack test information)
 Maximum hourly throughput = 20 tons of material/hour



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

- b. Emission Limitation:
5.26 tons PE/year

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:
2.80 lbs OC/hour

Applicable Compliance Method:

The emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on an emission factor of 0.14 lb of OC/ton of material (based on stack test information) and a maximum hourly throughput of 20 tons/hour.

If required, compliance with this limitation shall be based on stack testing using the methods and procedures specified in 40 CFR Part 60, Appendix A- Methods 1-4, and 18, 25 or 25A.

- Emission Limitation:
12.26 tons OC/year

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- d. Emission Limitations:
Visible PE shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- g) Miscellaneous Requirements

- (1) None.



9. P007, Pellet System #4

Operations, Property and/or Equipment Description:

Pellet system 4 – (28 Ton/Hr)

- 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. b)(1)b.and b)(2)c.
 - (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. d)(3) – d)(5)
- 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)	Control requirements [See b)(2)b] 1.68 lbs particulate emissions (PE)/hour and 7.36 tons PE/year Visible PE shall not exceed 10% opacity, as a six-minute average 3.92 lbs organic compounds (OC)/hour and 17.17 tons OC/year
b.	OAC rule 3745-31-05(D)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)a.

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



- b. Best available technology (BAT) control requirements for this emissions unit has been determined to be use of a high efficiency cyclones.
 - c. This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a cyclone to a maximum mass emission rate of 1.68 lbs/hr.
- c) Operational Restrictions
- (1) The maximum annual throughput for this emissions unit shall not exceed 245,280 tons of pelletized animal feed.
- a) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclone during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the cyclone on weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 2-5 inches of water.

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



this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain monthly records of the amount (tons per month and total tons, to date for the calendar year) of pelletized animal feed processed.
- (3) The permit to install for this emissions unit P007 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol
TLV (mg/m3): 1884.25
Maximum Hourly Emission Rate (lbs/hr): 3.92
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2130.00
MAGLC (ug/m3): 44,863.09

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (5) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the “Air Toxic Policy:”

- a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

b) 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.
- (2) The permittee shall submit annual reports which identify any exceedances of the annual pelletized animal feed throughput limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year.

a) Testing Requirements

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

- a. Emission Limitations:
1.68 lbs PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance in accordance with the following calculation:

PE will be controlled by a cyclone control system. The cyclone stack will result in a emission rate of 1.68 lbs PE/hr as determined in accordance with the following:

$$PE(\text{cyclone stack}) = (EF) (\text{maximum hourly throughput}) = 1.68 \text{ lbs PE/hr}$$

where:

EF = emission factor of 0.06 lb PE/ton of material (emission factor based on stack test information)



Maximum hourly throughput = 28 tons of material/hour

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

- b. Emission Limitation:
7.36 tons PE/year

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:
3.92 lbs OC/hour

Applicable Compliance Method:

The emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on an emission factor of 0.14 lb of OC/ton of material (based on stack test information) and a maximum hourly throughput of 28 tons/hour.

If required, compliance with this limitation shall be based on stack testing using the methods and procedures specified in 40 CFR Part 60, Appendix A- Methods 1-4, and 18, 25 or 25A.

- d. Emission Limitation:
17.17 tons OC/year

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation

- e. Emission Limitation:
Visible PE shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- g) Miscellaneous Requirements

- (1) None.



10. P008, Bagging

Operations, Property and/or Equipment Description:

15 tons/hr bagging operation

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)	0.0045 lb particulate matter (PE)/hr and 0.02 ton PE/yr Visible PE shall not exceed 5% opacity, as a six-minute average from the baghouse stack See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a high efficiency cyclone.

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).



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 2-5 inches of water.

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

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

- a. Emission Limitation:
0.0045 pound PE/hour

Applicable Compliance Method:

The permittee may calculate the actual hourly PE emission rate from this unit utilizing an emission factor of 0.03 pound PE/ton material bagged (as there is no AP-42 emission factor for this type of operation, the company created an emission factor which is based on the RACM emission limitation for a controlled unit, 0.03 gr/dscf), the actual hourly and the control efficiency of the high efficiency cyclone (100 percent capture, 99 percent control). If required, the permittee shall demonstrate compliance with the hourly limitation through emissions testing performed in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation:
0.02 ton PE/year

Applicable Compliance Method:

Compliance with the hourly limit will also demonstrate compliance with the annual limit as the annual limit is based on the hourly limit multiplied by 8760 hours/year.

- c. Emission Limitation:
Visible PE shall not exceed 5% opacity, as a six-minute from the baghouse stack.

Applicable Compliance Method:

- d. If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



11. P009, Grain Dryer

Operations, Property and/or Equipment Description:

Grain Dryer

- 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. d)(3) – d)(5)
- 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)	6.24 lbs particulate emissions (PE)/hour and 27.33 tons PE/year Visible PE shall not exceed 10% opacity as a six-minute average 6.72 lbs organic compounds (OC)/hour and 29.43 tons OC/year 0.92 lb nitrogen oxides (NO _x)/hour and 4.03 tons NO _x /year See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-21-08(B)	See b)(2)d.



(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a cyclone with a 100% capture efficiency and a 90% removal efficiency. BAT requirements also include compliance with the terms and conditions of this permit.
- 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).
- c. The visible PE limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-18(B) by committing to comply with the best available technology (BAT) requirements established in PTI 03-14043. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08(B) was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision of OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The permittee shall burn only propane in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

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

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the



following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 1-3 inches of water.

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

- (2) For each day during which the permittee burns a fuel other than propane, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (3) The Permit to Install for emissions unit P009 was evaluated based on the actual materials dried and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m³): 1884.25

Maximum Hourly Emission Rate (lbs/hr): 6.72

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 416.6

MAGLC (ug/m³): 44863

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;



- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- 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) 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 approximately 2.5 years after permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the lb/hr emission rates for PE and OC.



- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for OC, Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. 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 emissions unit P009 is operating at its maximum process weight rate as indicated in the permit application, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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).

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.

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.

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

- a. Emissions Limitation:
6.24 lbs PE/hour

Applicable Compliance Method:

Compliance with the lb/hr PE limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-5 [See Testing Requirements in Section f)(1)].

- b. Emissions Limitation:
27.33 tons PE/year

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation will assumed.



- c. Emissions Limitation:
6.72 lbs OC/hour

Applicable Compliance Method:

Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25 or 25A [See Testing Requirements in Section f)(1)].

- d. Emissions Limitation:
29.43 tons OC/year

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation will be assumed.

- e. Emissions Limitation:
0.92 lb NO_x/hour

Applicable Compliance Method:

The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no monitoring and recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with these limitations. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures in Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

* The hourly potential to emit for this emissions unit is based on the maximum capacity of the dryer (6 mmBtu/hour) and an emission factor of 14 lb NO_x/1000gallons divided by 91.5 mmBtu/1000 gallons [AP-42, Chapter 1, Table 1.5-1 (10/96)].

- f. Emissions Limitation:
4.03 tons NO_x/year

Applicable Compliance Method:

The annual potential to emit is based on the hourly potential to emit and a maximum operating schedule of 8,760 hrs/yr.

- g. Emissions Limitation:
Visible PE shall not exceed 10% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- g) Miscellaneous Requirements

- (1) None.