



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

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

3/23/2009

Stacy Schmidt
Andersons Marathon Ethanol LLC
PO Box 119
Maumee, OH 43537

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0819750245
Permit Number: P0104169
Permit Type: OAC Chapter 3745-31 Modification
County: Darke

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Greenville Daily Advocate. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
RAPCA; Indiana

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Andersons Marathon Ethanol LLC

Issue Date: 3/23/2009
Permit Number: P0104169
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chapter 31 modification for 2 additional baghouses and for the reconfiguration of the grain storage bins
Facility ID: 0819750245
Facility Location: Andersons Marathon Ethanol LLC
5278 SEBRING WARNER RD,
Greenville, OH 45331
Facility Description: All Other Basic Organic Chemical Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Michael Maleski at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Andersons, Inc., 0819750245, is an ethanol production facility located Darke County. The facility processes corn to manufacture ethanol and distillers grains, which is used as animal feed. Corn is delivered by truck and rail to the facility. It is unloaded and stored in silos. The corn is dried, if necessary, and milled before being processed in the plant. The milled corn is mixed into a slurry and cooked. Afterwards, it is fermented to a slurry containing ethanol. This slurry is further refined through distillation and filtering. The resulting ethanol is denatured with gasoline and stored in tanks. The ethanol product is loaded into railcars or trucks using a loading rack.

A byproduct of this process is distillers grains, which is left over from the fermentation process. The grains are dried to various degrees, cooled and sold as animal feed.

3. Facility Emissions and Attainment Status:

The facility is located in Darke County, which is attainment for all criteria pollutants. Potential uncontrolled facility-wide emissions are presented in Table 1 in Section C below.

Table 1

Emissions Unit	Uncontrolled Potential Emissions (tons/yr)							
	CO	NO _x	SO ₂	PE	PM10	VOC	Single HAP	Total HAP
B001 - Thermal Oxidizer / Waste Heat Recovery Boiler	882.5	92.9	95.7	231.1	231.1	462.2	65.1	164.5
B002 - Thermal Oxidizer / Waste Heat Recovery Boiler								
P005 - Mash and Yeast Operations								
P007 - Distillation Process								
P008 - DDGS Dryer No. 1								
P009 - DDGS Dryer No. 2								
P010 - DDGS Dryer No. 3								
P011 - DDGS Dryer No. 4								
P013 - Methanators								
P902 - DDGS Handling and Cooling (B001/B002 stack only)								



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104169
Facility ID: 0819750245

Emissions Unit	Uncontrolled Potential Emissions (tons/yr)							
	CO	NO _x	SO ₂	PE	PM10	VOC	Single HAP	Total HAP
F002 - Column Grain Dryer	16.56	19.71	0.12	20.0	6.12	1.08	---	---
J001 - Denatured Ethanol Loading Rack	20.13	3.74	0.003	0.003	0.003	482.9	---	---
P001 - Grain Hammermill No. 1	---	---	---	78.0	78.0	---	---	---
P002 - Grain Hammermill No. 2								
P003 - Grain Hammermill No. 3								
P004 - Grain Hammermill No. 4								
P006 - Fermentation and Beer Well	---	---	---	33.0	17.4	1,917	306.7	315.1
P012 - Cooling Towers	---	---	---	13.7	13.7	---	---	---
P014 - Emergency Fire Water Pump	0.045	0.86	0.098	0.015	0.015	0.023	---	---
P901 - Grain Receiving (Truck and Rail), Handling and Storage	---	---	---	201.6	201.6	---	---	---
P902 - DDGS Handling and Cooling	---	---	---	64.6	64.6	525.5	31.5	60.0
P903 - DDGS Loadout to Truck and Rail	---	---	---	34.2	34.2	---	---	---
P904 - Four Steel Grain Storage Bins	---	---	---	9.8	2.5	---	---	---
T001 - 200,000 gallon 190 Proof Ethanol Tank	---	---	---	---	---	0.53	---	---
T002 - 200,000 gallon 200 Proof Ethanol Tank	---	---	---	---	---	0.53	---	---
T003 - 200,000 gallon Gasoline Denaturant Tank	---	---	---	---	---	1.29	---	---
T004 - 1,500,000 gallon Denatured Ethanol Tank No. 1	---	---	---	---	---	0.30	---	---
T005 - 1,500,000 gallon Denatured Ethanol Tank No. 2	---	---	---	---	---	0.30	---	---
T006 - 1,500,000 gallon Denatured Ethanol Tank No. 3	---	---	---	---	---	0.30	---	---
Corrosion Inhibitor Tank (Insignificant)	---	---	---	---	---	0.1	---	---
Total	919.2	117.2	95.9	686.0	649.2	3,392	403.3	539.6

4. Source Emissions:

Potential controlled facility-wide emissions (i.e., allowable emissions) are presented Table 2 in Section D below.



5. Conclusion:

Potential controlled facility-wide emissions (i.e., allowable emissions) are presented in Table 2 below:

Table 2

Emissions Unit	Controlled Potential Emissions (tons/yr)							
	CO	NO _x	SO ₂	PE	PM10	VOC	Single H A P	Total H A P
B001 - Thermal Oxidizer / Waste Heat Recovery Boiler	88.2	92.9	95.7	11.6	11.6	23.1	3.34	8.33
B002 - Thermal Oxidizer / Waste Heat Recovery Boiler								
P005 - Mash and Yeast Operations								
P007 - Distillation Process								
P008 - DDGS Dryer No. 1								
P009 - DDGS Dryer No. 2								
P010 - DDGS Dryer No. 3								
P011 - DDGS Dryer No. 4								
P013 - Methanators								
P902 - DDGS Handling and Cooling (B001/B002 stack only)								
F002 - Column Grain Dryer	2.52	3.00	0.02	10.08	2.69	0.17	----	----
J001 - Denatured Ethanol Loading Rack	7.38	1.39	0.003	0.003	0.003	14.39	----	----
P001 - Grain Hammermill No. 1	----	----	----	3.90	3.90	----	----	----
P002 - Grain Hammermill No. 2								
P003 - Grain Hammermill No. 3								
P004 - Grain Hammermill No. 4								
P006 - Fermentation and Beer Well	----	----	----	0.66	0.35	38.34	6.13	6.30
P012 - Cooling Towers	----	----	----	13.7	13.7	----	----	----
P014 - Emergency Fire Water Pump	0.045	0.86	0.10	0.015	0.015	0.023	----	----
P901 - Grain Receiving (Truck and Rail), Handling and Storage	----	----	----	10.1	10.1	----	----	----
P902 - DDGS Handling and Cooling	----	----	----	3.23	3.23	10.51	0.63	1.20
P903 - DDGS Loadout to Truck and Rail	----	----	----	1.71	1.71	----	----	----
P904 - Four Steel Grain Storage Bins	----	----	----	9.8	2.5	----	----	----
T001 - 200,000 gallon 190 Proof Ethanol Tank	----	----	----	----	----	0.53	----	----
T002 - 200,000 gallon 200 Proof Ethanol Tank	----	----	----	----	----	0.53	----	----
T003 - 200,000 gallon Gasoline Denaturant Tank	----	----	----	----	----	1.29	----	----
T004 - 1,500,000 gallon Denatured Ethanol Tank No. 1	----	----	----	----	----	0.30	----	----
T005 - 1,500,000 gallon Denatured Ethanol Tank No. 2	----	----	----	----	----	0.30	----	----
T006 - 1,500,000 gallon Denatured Ethanol Tank No. 3	----	----	----	----	----	0.30	----	----



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104169
Facility ID: 0819750245

Emissions Unit	Controlled Potential Emissions (tons/yr)							
	CO	NO _x	SO ₂	PE	PM10	VOC	Single H A P	Total H A P
Corrosion Inhibitor Tank (Insignificant)	----	----	----	----	----	0.01	----	----
Total	98.15	98.15	95.82	64.80	49.80	89.80	9.90	22.15

The terms and conditions in this FEPTIO will limit the emissions to the values listed in Table 2. This is less than 100 TPY, which is the major source threshold with respect to Title V and New Source Review. Potential emissions have been limited through the use of regenerative thermal oxidizers at 98% control, baghouses at 0.005 gr/dscf grain loading, wet packed bed scrubber at 98% control, flares at 98% control, drift eliminators on the cooling tower, internal floating roofs on tanks, column perforations on the column dryer, and compliance with applicable OAC rules, emission limitations, monitoring, record keeping and reporting requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	11.29
PM10	10.35



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

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Andersons Marathon Ethanol LLC**

Facility ID: 0819750245
Permit Number: P0104169
Permit Type: OAC Chapter 3745-31 Modification
Issued: 3/23/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Andersons Marathon Ethanol LLC

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104169

Facility ID: 0819750245

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0819750245

Application Number(s): A0036432

Permit Number: P0104169

Permit Description: Chapter 31 modification for 2 additional baghouses and for the reconfiguration of the grain storage bins

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$2,500.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 3/23/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Andersons Marathon Ethanol LLC
5278 SEBRING WARNER RD
Greenville, OH 45331

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104169

Facility ID: 0819750245

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104169

Permit Description: Chapter 31 modification for 2 additional baghouses and for the reconfiguration of the grain storage bins

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

Emissions Unit ID:

P901

Company Equipment ID:

Grain Receiving, Scalping, Handling and Storage w/ Baghouses

Superseded Permit Number:

General Permit Category and Type:

Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104169

Facility ID: 0819750245

Effective Date: To be entered upon final issuance

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 Regional Air Pollution Control Agency 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 change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104169

Facility ID: 0819750245

Effective Date: To be entered upon final issuance

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

Draft Permit-to-Install and Operate

Permit Number: P0104169

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104169

Facility ID: 0819750245

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104169

Facility ID: 0819750245

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P901, Grain Receiving, Scalping, Handling and Storage w/ Baghouses

Operations, Property and/or Equipment Description:

Grain Receiving, Grain Handling Prior to Corn Storage, Corn Storage in Concrete Bins controlled by a baghouse (Stack S-20); Grain Material Handling associated with the Grain Dryer controlled by a baghouse (Stack S-22); Scalper and Grain Material Handling After Corn Storage controlled by a baghouse (Stack S-26)

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. b)(1)e., d)(1), d)(5), e)(1), e)(5), and f)(1)g.

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)	Each baghouse for this emissions unit shall achieve an outlet emission rate of not greater than 0.005 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases (gr/dscf). <u>Grain Receiving, Grain Handling Prior to Corn Storage, Corn Storage in Concrete Bins controlled by a baghouse (Stack S-20):</u> PE and emissions of particulate matter less than 10 microns in diameter (PM ₁₀) from the baghouse for this emissions unit shall not exceed 2.06 lbs/hr.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(A)(3)	<p><u>Grain Material Handling associated with the Grain Dryer controlled by a baghouse (Stack S-22):</u> PE and PM₁₀ emissions from the baghouse for this emissions unit shall not exceed 0.12 lb/hr.</p> <p><u>Scalper and Grain Material Handling After Corn Storage controlled by a baghouse (Stack S-26):</u> PE and PM₁₀ emissions from the baghouse for this emissions unit shall not exceed 0.13 lb/hr.</p> <p>Fugitive PE shall not exceed 1.21 tons per year (TPY).</p> <p>Fugitive PM₁₀ emissions shall not exceed 0.27 TPY.</p> <p>Visible PE from the baghouse stacks serving this emissions unit shall not exceed 0% opacity.</p> <p>Visible PE of fugitive dust from grain handling operations shall not exceed 0% opacity.</p> <p>Visible PE of fugitive dust from truck and railcar unloading shall not exceed 5% opacity.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-17-07(A)(1); OAC rule 3745-17-11(B)(1); and 40 CFR 60 Subpart DD	The emissions limitation specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)	See b)(2)b.
d.	OAC rule 3745-17-08(B)	See b)(2)c.
e.	OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	PE and PM ₁₀ emissions from the baghouses serving this emissions unit shall not exceed 10.08 tons per rolling 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

(2) Additional Terms and Conditions

- a. The rolling 12-month allowable emission rates are based on the annual production of 132,000,000 gallons of denatured ethanol.
- 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)(e).
- c. The facility 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 emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- d. This emissions unit is permitted at its potential to emit, as defined in OAC rule 3745-31-01, for all pollutants.
- e. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of enclosures and the venting of all PE to baghouses with a maximum grain loading of 0.005 gr/dscf. BAT also includes compliance with the terms and conditions of this permit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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 each baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The acceptable pressure drop range shall be based upon the manufacturer's specifications, which is 0.25 to 8 inches of water for each of the three baghouses serving this emissions unit.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. 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 in this permit, 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. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across each baghouse 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 permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit 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 perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.



- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive emissions from the truck and railcar unloading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
- (4) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the grain handling operations. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (5) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the PE and PM₁₀ emissions for each month, in tons; and
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of PE and PM₁₀ emissions, in tons.

During the first 12 calendar months of operation, the permittee shall record the cumulative PE and PM₁₀ emissions, in tons, of the emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation or exceedance of a federally enforceable requirement contained in this permit to include:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across any of the baghouses were outside of the acceptable range;
 - b. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the



Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month PE and PM₁₀ emissions limitations.
- c. an identification of each incident of deviation described in e)(1)a or e)(1)b where a prompt investigation was not conducted;
- d. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. an identification of each incident of deviation described in e)(1)b where prompt corrective action, that would bring the emissions unit into compliance with any federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s), was determined to be necessary and was not taken;
- f. an identification of each incident of deviation described in e)(1)a or e)(1)b where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- g. the probable cause of each deviation;
- h. any corrective actions that were taken to remedy the deviations or prevent future deviations; and
- i. the level or magnitude of excursion above the acceptable restricted limitation(s), operational restriction(s), and/or control device parameter limitation(s) and the duration (number of hours and date) of each deviation.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.



- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(3) above:
 - a. all days during which any visible fugitive particulate emissions were observed from the truck and railcar unloading; and
 - b. any corrective actions taken to eliminate the visible fugitive particulate emissions.
 - (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(4) above:
 - a. all days during which any visible fugitive particulate emissions were observed from the grain handling operations; and
 - b. any corrective actions taken to eliminate the visible fugitive particulate emissions.
 - (5) The permittee shall submit annual reports which specify the total PE and PM₁₀ emissions in tons per rolling 12-month period from this emissions unit for the previous calendar year. This report shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.
 - (6) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation

Each baghouse for this emissions unit shall achieve an outlet emission rate of not greater than 0.005 gr PE /dscf.

Applicable Compliance Method

Grain Receiving, Grain Handling Prior to Corn Storage, Corn Storage in Concrete Bins controlled by a baghouse (Stack S-20): Compliance with the allowable gr PE/dscf shall be determined through the performance testing as described below in f)(2).

Grain Material Handling associated with the Grain Dryer controlled by a baghouse (Stack S-22): If required, compliance may be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(10).



Scalper and Grain Material Handling After Corn Storage controlled by a baghouse (Stack S-26): If required, compliance may be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Emission Limitation

Grain Receiving, Grain Handling Prior to Corn Storage, Corn Storage in Concrete Bins controlled by a baghouse (Stack S-20): PE and PM₁₀ emissions from the baghouse for this emissions unit shall not exceed 2.06 lbs/hr.

Applicable Compliance Method

Compliance with the allowable lb PE/hr limitation shall be determined through the performance testing as described below in f)(2). Compliance with the allowable lb PM₁₀/hr limitation is assumed with compliance of the lb PE/hr limitation.

c. Emission Limitation

Grain Material Handling associated with the Grain Dryer controlled by a baghouse (Stack S-22): PE and PM₁₀ emissions from the baghouse for this emissions unit shall not exceed 0.12 lb/hr.

Applicable Compliance Method

Compliance shall be calculated using the exhaust grain loadings of the baghouse and inputs representing the Potential To Emit (PTE), as follows:

$$\text{S-22 Emissions} = (\text{exhaust PE concentration}) * (\text{exhaust flow rate}) * (60 \text{ min/hr}) / (7000 \text{ gr/lb})$$

$$\text{S-22 Emissions} = (0.005 \text{ gr/dscf}) * (2750 \text{ dscf/min}) * (60 \text{ min/hr}) / (7000 \text{ gr/lb})$$

$$\text{S-22 Emissions} = 0.12 \text{ lb/hr}$$

If required, compliance may be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the allowable lb PM₁₀/hr limitation is assumed with compliance of the lb PE/hr limitation.

d. Emission Limitation

Scalper and Grain Material Handling After Corn Storage controlled by a baghouse (Stack S-26): PE and PM₁₀ emissions from the baghouse for this emissions unit shall not exceed 0.13 lb/hr.

Applicable Compliance Method

Compliance shall be calculated using the exhaust grain loadings of the baghouse and inputs representing the Potential To Emit (PTE), as follows:



$$\text{S-26 Emissions} = (\text{exhaust PE concentration}) * (\text{exhaust flow rate}) * (60 \text{ min/hr}) / (7000 \text{ gr/lb})$$

$$\text{S-26 Emissions} = (0.005 \text{ gr/dscf}) * (2950 \text{ dscf/min}) * (60 \text{ min/hr}) / (7000 \text{ gr/lb})$$

$$\text{S-26 Emissions} = 0.13 \text{ lb/hr}$$

If required, compliance may be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the allowable lb PM₁₀/hr limitation is assumed with compliance of the lb PE/hr limitation.

e. Emission Limitation

Fugitive PE shall not exceed 1.21 TPY.

Applicable Compliance Method

Compliance shall be calculated using AP-42 Table 9.9.1-1 (March 2003) for the fugitive grain receiving emissions and inputs representing the Potential To Emit (PTE), as follows:

$$\text{Emissions} = (\text{grain throughput}) * (\text{emission factor}) * (1 - \text{baghouse capture efficiency}) / (2000 \text{ lbs/ton})$$

$$\text{Emissions} = (1,384,270 \text{ tons grain/yr}) * (0.035 \text{ lb/ton grain}) * (1 - 95\%) / (2000 \text{ lbs/ton})$$

$$\text{Emissions} = 1.21 \text{ TPY}$$

f. Emission Limitation

Fugitive PM₁₀ emissions shall not exceed 0.27 TPY.

Applicable Compliance Method

Compliance shall be calculated using AP-42 Table 9.9.1-1 (March 2003) for the fugitive grain receiving emissions and inputs representing the Potential To Emit (PTE), as follows:

$$\text{Emissions} = (\text{grain throughput}) * (\text{emission factor}) * (1 - \text{baghouse capture efficiency}) / (2000 \text{ lbs/ton})$$

$$\text{Emissions} = (1,384,270 \text{ tons grain/yr}) * (0.0078 \text{ lb/ton grain}) * (1 - 95\%) / (2000 \text{ lbs/ton})$$

$$\text{Emissions} = 0.27 \text{ TPY}$$



g. Emission Limitations

PE and PM₁₀ emissions from the baghouses serving this emissions unit shall not exceed 10.08 tons per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in d)(5) and shall be calculated using the exhaust grain loadings of the baghouses and inputs representing the Potential To Emit (PTE), as follows:

$$\text{Emissions} = \text{S-20 Baghouse Emissions} + \text{S-22 Baghouse Emissions} + \text{S-26 Baghouse Emissions}$$

$$\text{Baghouse Emissions} = (\text{exhaust PE concentration}) * (\text{exhaust flow rate}) * (60 \text{ min/hr}) * (8760 \text{ hrs/yr}) / (7000 \text{ gr/lb}) / (2000 \text{ lbs/ton})$$

$$\text{S-20 Baghouse Emissions} = (0.005 \text{ gr/dscf}) * (48,000 \text{ dscf/min}) * (60 \text{ min/hr}) * (8760 \text{ hrs/yr}) / (7000 \text{ gr/lb}) / (2000 \text{ lbs/ton})$$

$$\text{S-20 Baghouse Emissions} = 9.01 \text{ tons per rolling 12-month period}$$

$$\text{S-22 Baghouse Emissions} = (0.005 \text{ gr/dscf}) * (2750 \text{ dscf/min}) * (60 \text{ min/hr}) * (8760 \text{ hrs/yr}) / (7000 \text{ gr/lb}) / (2000 \text{ lbs/ton})$$

$$\text{S-22 Baghouse Emissions} = 0.52 \text{ ton per rolling 12-month period}$$

$$\text{S-26 Baghouse Emissions} = (0.005 \text{ gr/dscf}) * (2950 \text{ dscf/min}) * (60 \text{ min/hr}) * (8760 \text{ hrs/yr}) / (7000 \text{ gr/lb}) / (2000 \text{ lbs/ton})$$

$$\text{S-26 Baghouse Emissions} = 0.55 \text{ ton per rolling 12-month period}$$

$$\text{Emissions} = 9.01 + 0.52 + 0.55 = 10.08 \text{ tons per rolling 12-month period}$$

h. Emission Limitations

Visible PE from the baghouse stacks serving this emissions unit shall not exceed 0% opacity.

Visible PE of fugitive dust from grain handling operations shall not exceed 0% opacity.

Visible PE of fugitive dust from truck and railcar unloading shall not exceed 5% opacity.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

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



- a. The emission testing shall be conducted within 12 months prior to permit expiration.
- b. The emission testing shall be conducted to:
 - i. demonstrate compliance with the outlet concentration of 0.005 gr PE/dscf for Grain Receiving, Grain Handling Prior to Corn Storage, Corn Storage in Concrete Bins controlled by a baghouse (Stack S-20); and
 - ii. demonstrate compliance with the allowable emissions rate for PE of 2.06 lbs/hr for Grain Receiving, Grain Handling Prior to Corn Storage, Corn Storage in Concrete Bins controlled by a baghouse (Stack S-20).
- c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
 - i. Filterable PE, Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Regional Air Pollution Control Agency.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) The requirements in this permit for P901 supercede the requirements of PTI 08-04878 for P901 issued April 22, 2008 and represent a 6.58 TPY increase in PE from point



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

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(stack) sources, 0.42 TPY decrease in fugitive PE and a 0.24 TPY decrease in fugitive PM10 emissions for this emissions unit.