



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

5/26/2009

Mr. Chuck McDaniel
Case Farms, LLC
4001 Millennium Blvd SE
Massillon, OH 44646

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576135001
Permit Number: P0104074
Permit Type: Initial Installation
County: Stark

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	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 Canton City Health Department. 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Canton

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
Case Farms, LLC**

Facility ID: 1576135001
Permit Number: P0104074
Permit Type: Initial Installation
Issued: 5/26/2009
Effective: 5/26/2009
Expiration: 5/26/2019



Air Pollution Permit-to-Install and Operate
for
Case Farms, LLC

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Final Permit-to-Install and Operate
Permit Number: P0104074
Facility ID: 1576135001
Effective Date: 5/26/2009

Authorization

Facility ID: 1576135001
Application Number(s): A0035948, A0036594
Permit Number: P0104074
Permit Description: Poultry feed mill
Permit Type: Initial Installation
Permit Fee: \$8,600.00
Issue Date: 5/26/2009
Effective Date: 5/26/2009
Expiration Date: 5/26/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Case Farms, LLC
4001 Millennium Blvd SE
Massillon, OH 44646

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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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: P0104074
Permit Description: Poultry feed mill

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:	EP8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F001
Company Equipment ID:	EP13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	EP1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	EP2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	EP3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	EP4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	EP5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	EP6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	EP7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	EP10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	EP11



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Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: P012
Company Equipment ID: EP12A
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: P013
Company Equipment ID: EP12B
Superseded Permit Number:
General Permit Category and Type: Not Applicable



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Final Permit-to-Install and Operate

Permit Number: P0104074

Facility ID: 1576135001

Effective Date: 5/26/2009

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 Canton City Health Department 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: P0104074

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Effective Date: 5/26/2009

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

Final Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104074

Facility ID: 1576135001

Effective Date: 5/26/2009

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104074

Facility ID: 1576135001

Effective Date: 5/26/2009

C. Emissions Unit Terms and Conditions



1. B001, EP8

Operations, Property and/or Equipment Description:

16.8 mmbtu/hr natural gas fired steam 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)(a)(ii)	See b)(2)a. and b)(2)b. below
b.	OAC rule 3745-31-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-31-17-10(B)(1)	See b)(2)c. below.
d.	OAC rule 3745-21-08(B)	See b)(2)d.
e.	40 CFR Part 60 Subpart Dc	Recordkeeping and reporting

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to emissions of nitrogen oxides (NOx), sulfur dioxide (SO2), carbon monoxide (CO), volatile organic compounds (VOC's), or particulate matter less than 10 microns in diameter (PM10) from this air contaminant source since the uncontrolled potential to emit NOx, SO2, CO, VOC's, and PM10 are each less than ten tons per year.



- b. The emissions listed below reflect the emissions unit's potential to emit. Therefore it is not necessary to develop additional monitoring, record keeping, or reporting requirements to ensure compliance with these limits:
 - i. 1.7 lb/hr and 7.2 tpy for NOX, 0.01 lb/hr and 0.04 tpy for SO₂, 1.4 lb/hr and 6.1 tpy for CO, 0.1 lb/hr and 0.4 tpy for VOC's, and 0.13 lb/hr and 0.6 tpy for PE/PM₁₀ (all PE is considered PM₁₀).
- c. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-31-17-10(B)(1) is less than the potential to emit PE for this emissions unit.
- d. The design of the emissions unit and the use of natural gas only as fuel will satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to 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 natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the total volume of natural gas (mmft³) burned in this emissions unit.

e) Reporting Requirements

- (1) Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and,
 - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to the Canton City Health Department and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669



- (2) 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 1.b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation(s):

The hourly and annual uncontrolled potential to emit for NO_x, SO₂, CO, VOC's, and PM₁₀ is demonstrated as follows:

Applicable Compliance Method(s):

The hourly NO_x emissions equals 1.7 lb/hr and is determined by dividing the maximum emission rate of 100 lbs NO_x/10⁶ scf of natural gas (AP-42, Section 1.4, Table 1.4-1, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 16.8 mmBtu/hr. Multiplying the hourly NO_x emissions by the maximum operating schedule of 8,760 hrs/yr and by a conversion factor of 1 ton/2000 lbs gives the annual emissions of 7.2 tpy NO_x.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The hourly SO₂ emissions equals 0.01lb/hr and is determined by dividing the maximum emission rate of 0.6 lb SO₂/10⁶ scf of natural gas (AP-42, Section 1.4, Table 1.4-2, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 16.8 mmBtu/hr. Multiplying the hourly SO₂ emissions by the maximum operating schedule of 8,760 hrs/yr and by a conversion factor of 1 ton/2000 lbs gives the annual emissions of 0.04 tpy SO₂.

The hourly CO emissions equals 1.4 lb/hr and is determined by dividing the maximum emission rate of 84 lbs CO/10⁶ scf of natural gas (AP-42, Section 1.4, Table 1.4-1, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 16.8 mmBtu/hr. Multiplying the hourly CO emissions by the maximum operating schedule of 8,760 hrs/yr and by a conversion factor of 1 ton/2000 lbs gives the annual emissions of 6.1 tpy CO.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

The hourly VOC emissions equals 0.1 lb/hr and is determined by dividing the maximum emission rate of 5.5 lbs VOC/10⁶ scf of natural gas (AP-42, Section 1.4, Table 1.4-2, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 16.8 mmBtu/hr. Multiplying the hourly VOC emissions by



the maximum operating schedule of 8,760 hrs/yr and by a conversion factor of 1 ton/2000 lbs gives the annual emissions of 0.4 tpy VOC.

The hourly PM10 emissions equals 0.13 lb/hr and is determined by dividing the maximum emission rate of 7.6 lbs PM10/10⁶ scf of natural gas (AP-42, Section 1.4, Table 1.4-2, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 16.8 mmBtu/hr. Multiplying the hourly PM10 emissions by the maximum operating schedule of 8,760 hrs/yr and by a conversion factor of 1 ton/2000 lbs gives the annual emissions of 0.6 tpy PM10.

b. Emission Limitation(s):

Visible particulate emissions shall not exceed 20% opacity as a six-minute average:

Applicable Compliance Method(s):

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.



2. F001, EP13

Operations, Property and/or Equipment Description:

Roadways and parking areas

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)(a)(ii)	0.80 pounds/hour and 3.52 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
c.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)

(2) Additional Terms and Conditions

a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution controls) as



proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. the permittee has committed to implementing good housekeeping practices and use of watering to minimize fugitive dust emissions from paved and unpaved roadways and parking areas. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- ii. the PM10 emissions shall not exceed 0.8 lb/hr and 3.52 tpy

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	daily

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (3) The Permittee may, upon request and written approval from the Ohio EPA or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.



The information required in d)(4)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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 2.b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitations:

- 0.8 lb/hr and 3.52 tpy of fugitive PM10

- Applicable Compliance Method:

- Compliance with fugitive PM10 limitations shall be determined by using the emission factor equations in Section 13.2.1 of AP-42, Fifth Edition, Volume 1, (revised 12/03) for paved roadways, and Section 13.2.2 for unpaved roadways in association with parameters provided in the permit application. Should further updates in AP-42 occur, the most current equations for paved and unpaved roads shall be used. The emission limits in this permit were based on a maximum of 163 vehicle miles traveled per year for paved roads and 2 vehicle miles traveled per year for unpaved roads and parking.

g) Miscellaneous Requirements

- (1) None.



3. P001, EP1

Operations, Property and/or Equipment Description:

Truck receiving pit with fabric filter

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(F)	0.06 pounds/hour and 0.13 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the truck unloading pit shall be located in a four-sided building with roof and equipped with operable truck entrance and exit doors.
 - ii. the enclosure shall exhaust to a fabric filter baghouse having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - iii. the PM10 emissions shall not exceed 0.06 lb/hr and 0.13 tpy.
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Table I with a process weight rate of 249 tons per hour) is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum rate of grain unloaded to the truck receiving pit shall not exceed 249 tons per hour and 1,048,320 tons per year.
- (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating. When necessitated by wind conditions, the truck entrance door shall be closed during dumping of grain to minimize fugitive dust emissions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).



With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain daily and annual records of the quantity of grain unloaded through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 3.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 0.06 lb/hr and 0.13 tpy.

Applicable Compliance Method:

The hourly rate of PM10 is demonstrated by summing the hourly fugitive PM10 and the hourly stack PM10 emissions:

Hourly fugitive PM10 emissions:

$$(249 \text{ tons grain/hr})(0.0025 \text{ lb PM10 /ton grain})(1 - 0.9) = 0.0626 \text{ lb/hr}$$

Hourly stack PM10 emissions:



$$(249 \text{ tons grain/hr})(0.0025 \text{ lb PM}_{10}/\text{ton grain})(1 - 0.1)(1 - 0.999) = 0.0006 \text{ lb/hr}$$

Total PM₁₀ = 0.0626 lb/hr + 0.0006 lb/hr = 0.06 lb/hr, rounded off, where

249 tons grain/hr is the maximum grain handled by the truck pit,

0.0025 lb PM₁₀/ton grain) is an uncontrolled Emissions Factor for PM₁₀ from AP-42, Table 9.9.1-2,

0.90 is the capture efficiency of the dumping pit enclosure, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

If required, the permittee shall demonstrate compliance with the hourly stack emissions rate by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201/201A of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual rate of PM₁₀ emissions is demonstrated by summing the annual fugitive PM₁₀ and the annual stack PM₁₀ emissions.

Annual fugitive PM₁₀ emissions:

$$\frac{(1,048,320 \text{ tons grain/yr})(0.0025 \text{ lb PM}_{10}/\text{ton grain})(1 - 0.90)}{2000 \text{ lb/ton}} = 0.131 \text{ tpy}$$

Annual stack PM₁₀ emissions:

$$\frac{(1,048,320 \text{ tons grain/yr})(0.0025 \text{ lb PM}_{10}/\text{ton grain})(0.90)(1 - 0.999)}{2000 \text{ lb/ton}} = 0.001 \text{ tpy}$$

Total PM₁₀ = 0.131 tpy + 0.001 tpy = 0.13 tpy, rounded off, where

1,048,320 tons grain/yr is the maximum grain handled by the truck pit,

0.0025 lb PM₁₀/ton grain) is an uncontrolled Emissions Factor for PM₁₀ from AP-42, Table 9.9.1-2,

0.90 is the capture efficiency of the dumping pit enclosure (90%) expressed as a decimal, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104074

Facility ID: 1576135001

Effective Date: 5/26/2009

g) Miscellaneous Requirements

(1) None.



4. P002, EP2

Operations, Property and/or Equipment Description:

Hammermill with fabric filter

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)(a)(ii)	0.03 pounds/hour and 0.09 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the emissions unit shall exhaust to a fabric filter baghouse having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - ii. PM10 emissions shall not exceed 0.03 lb/hr and 0.09 tpy.
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Fig. II with an uncontrolled PE of 109 lb/hr) is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum rate of grain processed through this emissions unit shall not exceed 52 tons per hour and 331,240 tons per year.
- (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain daily and annual records of the quantity of grain processed through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 4.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 0.03 lb/hr and 0.09 tpy.

Applicable Compliance Method:

The hourly rate of PM10 emissions is demonstrated by calculation as follows:

$$(52 \text{ tons grain/hr})(0.000525 \text{ lb PM10/ton grain}) = 0.03 \text{ lb/hr, where}$$

52 tons grain/hr is the maximum grain processed by the emissions unit, and 0.000525 lb PM10/ton grain) is ¼ of the Emissions Factor for the total PE given in Table 4.13 (0.0021 lb/ton) in "Emission Factor Documentation for AP-42, Section 9.9.1" for grain processing facilities.

If required, the permittee shall demonstrate compliance with the hourly stack emissions rate by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201/201A of 40 CFR, Part 51, Appendix M.



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

The annual rate of PM10 emissions is demonstrated by calculation as follows:

$$\frac{(331,240 \text{ tons grain/yr})(0.000525 \text{ lb PE/ton grain})}{2000 \text{ lb/ton}} = 0.09 \text{ tpy, where}$$

331,240 tons grain/yr is the maximum grain processed by the emissions unit, and 0.000525 lb PM10/ton grain) is ¼ of the Emissions Factor for the total PE given in Table 4.13 (0.0021 lb/ton) in “Emission Factor Documentation for AP-42, Section 9.9.1” for grain processing facilities.

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.



5. P003, EP3

Operations, Property and/or Equipment Description:

Mill receiving turnhead with fabric filter

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(F)	0.86 pounds/hour and .32 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the emissions unit shall exhaust to a fabric filter baghouse having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - ii. the PM10 emissions shall not exceed 0.86 lb/hr and 0.32 tpy
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Fig. II, with an uncontrolled PE of 15.19 lb/hr), is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum rate of grain unloaded to the truck receiving pit shall not exceed 249 tons per hour and 183,456 tons per year.
- (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain daily and annual records of the quantity of grain unloaded through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 5.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 0.86 lb/hr and 0.32 tpy.

Applicable Compliance Method:

The hourly rate of PM10 is demonstrated by summing the hourly fugitive PM10 and the hourly stack PM10 emissions:

Hourly fugitive PM10 emissions:

$$(249 \text{ tons grain/hr})(0.034 \text{ lb PM10 /ton grain})(1 - 0.90) = 0.85 \text{ lb/hr}$$

Hourly stack PM10 emissions:

$$(249 \text{ tons grain/hr})(0.034 \text{ lb PM10/ton grain})(0.90)(1 - 0.999) = 0.008 \text{ lb/hr}$$



Total PM10 = 0.85 lb/hr + 0.008 lb/hr = 0.86 lb/hr, where

249 tons grain/hr is the maximum grain handled,

0.034 lb PM10/ton grain) is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1,

0.90 is the capture efficiency of the headhouse and grain handling equipment (90%) expressed as a decimal, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

If required, the permittee shall demonstrate compliance with the hourly stack emissions rate by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201/201A of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual rate of PM10 emissions is demonstrated by summing the annual fugitive PM10 and the annual stack PM10 emissions.

Annual fugitive PM10 emissions:

$$\frac{(183,456 \text{ tons grain/yr})(0.034 \text{ lb PM10/ton grain})(1 - 0.90)}{2000 \text{ lb/ton}} = 0.312 \text{ tpy}$$

Annual stack PM10 emissions:

$$\frac{(183,456 \text{ tons grain/yr})(0.0034 \text{ lb PM10/ton grain})(0.90)(1 - 0.999)}{2000 \text{ lb/ton}} = 0.003 \text{ tpy}$$

Total PM10 = 0.312 tpy + 0.003 tpy = 0.32 tpy, where

183,456 tons grain/yr is the maximum grain handled,

0.034 lb PM10/ton grain) is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1,

0.90 is the capture efficiency of the headhouse and grain handling equipment (90%) expressed as a decimal, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

b. Emission Limitation

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

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104074

Facility ID: 1576135001

Effective Date: 5/26/2009

g) Miscellaneous Requirements

(1) None.



6. P004, EP4

Operations, Property and/or Equipment Description:

#1 Pneumatic truck receiving system

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(F)	0.01 pounds/hour and .01 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the emissions unit shall exhaust to a fabric filter baghouse having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - ii. the PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Table I with a process weight rate of 25 tons per hour) is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum rate of dry ingredients unloaded to the truck receiving pit shall not exceed 25 tons per hour and 5200 tons per year.
- (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain daily and annual records of the quantity of dry ingredients unloaded through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 6.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy.

Applicable Compliance Method:

The following calculation demonstrates that the allowable hourly rate of PM10 emissions is not exceeded:

$$(25 \text{ tons /hr})(0.0070 \text{ lb PM10/ton})(1-0.999) = 0.00018 \text{ lb PM10/hr}$$

where

25 tons /hr is the maximum dry ingredient unloading rate,

0.0070 lb PM10/ton) is an uncontrolled PM10 Emissions Factor from AP-42, Table 11.26-1, November 1995, for final product storage bin loading of talc, and



0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

The following calculation demonstrates that the allowable annual rate of PM10 emissions is not exceeded:

$$\frac{(5200 \text{ tons /yr})(0.0070 \text{ lb PM10/ton}) (1-0.999)}{2000 \text{ lb/ton}} = 0.00002 \text{ tpy,}$$

where

5200 tons /yr is the maximum dry ingredient unloading rate,

0.0070 lb PM10/ton) is an uncontrolled PM10 Emissions Factor from AP-42, Table 11.26-1, November 1995, for final product storage bin loading of talc, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

g) Miscellaneous Requirements

- (1) None.



7. P005, EP5

Operations, Property and/or Equipment Description:

#2 Pneumatic truck receiving system

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(F)	0.01 pounds/hour and .01 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the emissions unit shall exhaust to a fabric filter baghouse having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - ii. the PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Table I with a process weight rate of 25 tons per hour) is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum rate of dry ingredients unloaded to the receiving bins shall not exceed 25 tons per hour and 5200 tons per year.
- (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain daily and annual records of the quantity of dry ingredients unloaded through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 7.b)(1)a of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy.

Applicable Compliance Method:

The following calculation demonstrates that the allowable hourly rate of PM10 emissions is not exceeded:

$$(25 \text{ tons /hr})(0.0070 \text{ lb PM10/ton})(1-0.999) = 0.00018 \text{ lb PM10/hr}$$

where

25 tons /hr is the maximum dry ingredient unloading rate,

0.0070 lb PM10/ton) is an uncontrolled PM10 Emissions Factor from AP-42, Table 11.26-1, November 1995, for final product storage bin loading of talc, and



0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

The following calculation demonstrates that the allowable annual rate of PM10 emissions is not exceeded:

$$\frac{(219,000 \text{ tons /yr})(0.0070 \text{ lb PM10/ton}) (1-0.999)}{2000 \text{ lb/ton}} = 0.0008 \text{ tpy,}$$

where

219,000 tons /yr is the maximum dry ingredient unloading rate,

0.0070 lb PM10/ton) is an uncontrolled PM10 Emissions Factor from AP-42, Table 11.26-1, November 1995, for final product storage bin loading of talc, and

(2) 0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

g) Miscellaneous Requirements

(1) None.



8. P006, EP6

Operations, Property and/or Equipment Description:

Ground grain handling and storage

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(F)	0.18 pounds/hour and 0.57 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the emissions unit shall exhaust to a fabric filter baghouse having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - ii. the PM10 emissions shall not exceed 0.18 lb/hr and 0.57 tpy
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Table I with a process weight rate of 52 tons per hour) is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum ground grain handling rate shall not exceed 52 tons per hour and 331,240 tons per year.
- (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain daily and annual records of the quantity of grain unloaded through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 8.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation :

PM10 emissions shall not exceed 0.18 lb/hr and 0.57 tpy.

Applicable Compliance Method:

The hourly rate of PM10 is demonstrated by summing the hourly fugitive PM10 and the hourly stack PM10 emissions:

Hourly fugitive PM10 emissions:

$$(52 \text{ tons grain/hr})(0.034 \text{ lb PM10 /ton grain})(1 -0.90) = 0.18 \text{ lb/hr}$$

Hourly stack PM10 emissions:

$$(52 \text{ tons grain/hr})(0.034 \text{ lb PM10/ton grain})(0.90)(1 -0.999) =0.002 \text{ lb/hr}$$



Total PM10 = 0.18 lb/hr + 0.002 lb/hr = 0.18 lb/hr, rounded off, where

52 tons grain/hr is the maximum grain handled,

0.034 lb PM10/ton grain) is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1,

0.90 is the capture efficiency of the headhouse and grain handling equipment (90%) expressed as a decimal, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

If required, the permittee shall demonstrate compliance with the hourly stack emissions rate by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201/201A of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual rate of PM10 emissions is demonstrated by summing the annual fugitive PM10 and the annual stack PM10 emissions.

Annual fugitive PM10 emissions:

$$\frac{(331,240 \text{ tons grain/yr})(0.034 \text{ lb PM10/ton grain})(1 - 0.90)}{2000 \text{ lb/ton}} = 0.563 \text{ tpy}$$

Annual stack PM10 emissions:

$$\frac{(331,240 \text{ tons grain/yr})(0.034 \text{ lb PM10/ton grain})(0.90)(1 - 0.999)}{2000 \text{ lb/ton}} = 0.005 \text{ tpy}$$

Total PM10 = 0.563 tpy + 0.005 tpy = 0.568 tpy, where

331,240 tons grain/yr is the maximum grain handled,

0.034 lb PM10/ton grain) is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1,

0.90 is the capture efficiency of the headhouse and grain handling equipment (90%) expressed as a decimal, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

b. Emission Limitation

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

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104074

Facility ID: 1576135001

Effective Date: 5/26/2009

g) Miscellaneous Requirements

(1) None



9. P007, EP7

Operations, Property and/or Equipment Description:

Mash handling, pelletizing, and pellet cooling system

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(F)	2.05 pounds/hour and 9.0 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the emissions unit shall exhaust to a high efficiency cyclone having a minimum control efficiency of 90% based on 10 micron and larger particles
 - ii. the PM10 emissions shall not exceed 2.05 lb/hr and 9.0 tpy.
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Fig. II with an uncontrolled PE of 712 lb/hr) is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum rate of grain processed through this emissions unit shall not exceed 63 tons per hour and 551,880 tons per year.
- (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain daily and annual records of the quantity of grain processed through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 9.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 2.05 lb/hr and 9.0 tpy.

Applicable Compliance Method:

The hourly rate of PM10 emissions is demonstrated by calculation as follows:

$$(63 \text{ tons feed/hr})(0.0325 \text{ lb PM10/ton feed}) = 2.05 \text{ lb/hr,}$$

where

63 tons grain/hr is the maximum grain processed by the emissions unit, and

0.0325 lb PM10/ton feed) is a controlled PM10 Emissions Factor utilizing a high efficiency cyclone from Table 4-13 of "Emission Factor Documentation for AP-42 Section 9.9.1, Grain Elevators and Grain Processing Plants, Final Report, May 2003"



If required, the permittee shall demonstrate compliance with the hourly stack emissions rate by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201/201A of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual rate of PM10 emissions is demonstrated by multiplying the hourly rate of 2.05 lb/hr times 8760 hrs/yr and dividing by a conversion factor of 2000lb/ton.

b. Emission Limitation:

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

Applicable Compliance Method:

- c. Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9

g) Miscellaneous Requirements

- (1) None.



10. P010, EP10

Operations, Property and/or Equipment Description:

Finish feed truck 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(F)	0.03 pounds/hour and 0.02 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the finished feed shall be transferred from the storage bins to a bulk hopper utilizing closed spouting. Transfer of feed from the bulk hopper to trucks shall be through flexible socks to minimize escape of dust. The truck loading process shall be located in a four (4) sided enclosure.
 - ii. the PM10 emissions shall not exceed 0.03 lb/hr and 0.02 tpy
- b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Table I with a process weight rate of 400 tons per hour) is less stringent than the potential to emit PE taking into account air pollution controls.

c) Operational Restrictions

- (1) The maximum rate of finished feed unloaded to the truck receiving pit shall not exceed 400 tons per hour and 509,600 tons per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily and annual records of the quantity of finished feed loaded through this emissions unit

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 allowable emission limitations in section 10.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 0.03 lb/hr and 0.02 tpy.

Applicable Compliance Method:

The hourly rate of PM10 is demonstrated by the following calculation:

$$(400 \text{ tons feed/hr})(0.0008 \text{ lb PM10 /ton feed})(1 - 0.90) = 0.03 \text{ lb PM10/hr, where}$$



400 tons feed/hr is the maximum feed loading rate, 0.0008 lb PM10/ton feed is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1,

0.90 is the capture efficiency (90% expressed as a decimal) of the enclosed spouting, flexible sock, and building enclosure.

The annual rate of PM10 emissions is demonstrated by the following calculation:

$$\frac{(509,600 \text{ tons feed/yr})(0.0008 \text{ lb PM10 /ton feed})(1 - 0.90)}{2000 \text{ lb /ton}} = 0.02 \text{ ton PM10/yr,}$$

where

509,600 tons feed/yr is the maximum feed loading rate, 0.0008 lb PM10/ton feed is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1, 0.90 is the capture efficiency (90% expressed as a decimal) of the enclosed spouting, flexible sock, and building enclosure, and 2000 is a factor to convert lbs of PM10 to tons.

g) Miscellaneous Requirements

- (1) None.



11. P011, EP11

Operations, Property and/or Equipment Description:

Rail receiving pit with fabric filter

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(F)	0.14 pounds/hour and 0.03 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations for fugitive dust specified in OAC rule 3745-17-07(B) pursuant to 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This emissions unit is not located in 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)
e.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.



(2) Additional Terms and Conditions

- a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. the railcar unloading pit shall be located in a four-sided building with roof. The entrance and exit openings shall be equipped with air curtain strips. Fugitive emissions shall be minimized by using “choke feeding” from hopper bottom railcars into a shallow pit.
 - ii. the PM10 emissions shall not exceed 0.14 lb/hr and 0.03 tpy.
 - b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Table I with a process weight rate of 560 tons per hour) is less stringent than the potential to emit PE taking into account air pollution controls.
- c) Operational Restrictions
- (1) The maximum rate of grain unloaded to the truck receiving pit shall not exceed 560 tons per hour and 236,600 tons per year.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily and annual records of the quantity of grain unloaded through this emissions unit.
- 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 allowable emission limitations in section 11.b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
PM10 emissions shall not exceed 0.14 lb/hr and 0.03 tpy.
 - Applicable Compliance Method:
The hourly rate of PM10 is demonstrated by the following calculation:
$$(560 \text{ tons grain/hr})(0.0025 \text{ lb PM10 /ton grain})(1 - 0.90) = 0.14 \text{ lb PM10/hr,}$$
where



560 tons grain/hr is the maximum unloading rate, 0.0025 lb PM10/ton grain is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1,

0.90 is the combined capture efficiency (90% expressed as a decimal) of the shallow pit, building enclosure, choke feed rate, and high conveyance speed.

The annual rate of PM10 emissions is demonstrated by the following calculation:

$$\frac{(236,600 \text{ tons grain/yr})(0.0025 \text{ lb PM10 /ton grain})(1 - 0.90)}{2000 \text{ lb /ton}} = 0.03 \text{ tpy PM10}$$

where,

236,600 tons grain/yr is the maximum unloading rate, 0.0025 lb PM10/ton grain is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1, and 0.90 is the combined capture efficiency (90% expressed as a decimal) of the shallow pit, building enclosure, choke feed rate, and high conveyance speed.

g) Miscellaneous Requirements

- (1) None.



12. P012, EP12A

Operations, Property and/or Equipment Description:

Whole grain storage silos No. 101, 102, 103

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(F)	0.01 pounds/hour and 0.01 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.

(2) Additional Terms and Conditions

a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. the emissions unit shall exhaust to a fabric filter baghouse having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - ii. the PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy
 - b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Fig. II, with an uncontrolled PE of 14 lb/hr), is less stringent than the potential to emit PE taking into account air pollution controls
- c) Operational Restrictions
 - (1) The maximum rate of grain transferred to storage shall not exceed 560 tons per hour and 794,976 tons per year.
 - (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
 - (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
 - (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less



frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (4) The permittee shall maintain daily and annual records of the quantity of grain transferred through this emissions unit.

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 identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 13.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy.

- a. Applicable Compliance Method:

Compliance with the hourly rate of PM10 is demonstrated by the following calculation:

$$(560 \text{ tons grain/hr})(0.0063 \text{ lb PM10 /ton grain})(1 - 0.999) = 0.004 \text{ lb/hr, where}$$

560 tons grain/hr is the maximum grain storage rate,

0.0063 lb PM10/ton grain is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

The annual rate of PM10 emissions is demonstrated by the following calculation:

$$\frac{(794,976 \text{ tons grain/yr})(0.0063 \text{ lb PM10/ton grain})(1 - 0.999)}{2000 \text{ lb/ton}} = 0.003 \text{ tpy,}$$



where 794,976 tons grain/yr is the maximum grain stored,

0.0063 lb PM10/ton grain) is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

b. Emission Limitation

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

Applicable Compliance Method

- (2) Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.



13. P013, EP12B

Operations, Property and/or Equipment Description:

Whole grain storage silos No. 104, 105

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(F)	0.01 pounds/hour and 0.01 tons/year of Particulate Matter 10 microns or less (PM10). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the potential to emit See b)(2)b.

(2) Additional Terms and Conditions

a. PTIO P0104074 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. the emissions unit shall exhaust to a fabric filter canister having a minimum control efficiency of 99.9% based on 2 micron and larger particles
 - ii. the PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy
 - b. The allowable Particulate Emissions (PE) pursuant to OAC rule 3745-17-11(B)(1) (using Fig. II, with an uncontrolled PE of 14 lb/hr), is less stringent than the potential to emit PE taking into account air pollution controls
- c) Operational Restrictions
 - (1) The maximum rate of grain transferred to storage shall not exceed 560 tons per hour and 794,976 tons per year.
 - (2) The permittee shall operate the dust control system in accordance with the manufacturer's recommendations, instructions, and operating manuals, whenever this emissions unit is operating.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
 - (2) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
 - (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less



frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (4) The permittee shall maintain daily and annual records of the quantity of grain transferred through this emissions unit.

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in section 13.b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM10 emissions shall not exceed 0.01 lb/hr and 0.01 tpy.

Applicable Compliance Method:

Compliance with the hourly rate of PM10 is demonstrated by the following calculation:

$$(560 \text{ tons grain/hr})(0.0063 \text{ lb PM10 /ton grain})(1 - 0.999) = 0.004 \text{ lb/hr, where}$$

560 tons grain/hr is the maximum grain storage rate,

0.0063 lb PM10/ton grain is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

The annual rate of PM10 emissions is demonstrated by the following calculation:

$$\frac{(794,976 \text{ tons grain/yr})(0.0063 \text{ lb PM10/ton grain})(1 - 0.999)}{2000 \text{ lb/ton}} = 0.003 \text{ tpy,}$$



where 794,976 tons grain/yr is the maximum grain stored,

0.0063 lb PM10/ton grain) is an uncontrolled Emissions Factor for PM10 from AP-42, Table 9.9.1-1, and

0.999 is the efficiency of the bag filter (99.9%) expressed as a decimal.

b. Emission Limitation

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

Applicable Compliance Method

- (2) Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9

g) Miscellaneous Requirements

- (1) None.