

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 01-12141

A. Source Description

Cargill AgHorizons (Cargill) currently operates a grain processing facility located in Bloomingburg , Ohio. They have proposed to increase their maximum throughput capacity to 47.6 million bushels of grain to support the proposed fuel-grade ethanol production plant, ASA Bloomingburg, LLC. The ethanol facility is planning to be fully operational in 2007.

B. Facility Emissions and Attainment Status

The facility will be a synthetic minor source with respect to both Title V permitting and PSD (this facility is considered to be one of the twenty-eight source categories, i.e. chemical processing plants because of the ethanol facility. Therefore emissions over 100 tons per year (TPY) of any criteria pollutant will trigger PSD review). Emissions from both the ethanol facility and the grain processing facility will limit all criteria pollutants to less than 100 TPY with all proposed operational restrictions of this permit and the permit for the ethanol plant (PTI 01-01306, issued on August 10, 2006).

The following table summarizes the total restricted emissions for criteria pollutants from both the ethanol facility and the grain processing facility combined:

Pollutant	ASA Bloomingburg (PTI 01-01306), in TPY	Cargill (PTI 01-01343), in TPY	Total Facility TPY
PE	68.65	29.88	98.53
PM10	61.84	11.89	73.73
SO2	83.4	0.04	83.44
NOx	91.95	6.43	98.38
CO	92.98	5.40	98.38
VOC	97.99	0.35	98.34

Fayette County is considered attainment for all criteria pollutants.

C. Source Emissions

In order to keep the potential emissions of all criteria pollutants below 100 tpy, Cargill will do the following as required by this permit:

1. limit the maximum annual grain throughput for the facility to 47,616,7864 bushels (1,333,272 tons) based on a rolling, 12-month summation;

D. Conclusion

Cargill will operate as a synthetic minor facility based on the restrictions of grain throughput and natural gas usage. The annual emissions will be recorded as rolling, 12-month summation. The operational restrictions, record keeping, reporting and testing requirement will ensure that compliance with this permit is achieved and maintained and therefore avoiding being subject to either Title V and/or PSD permitting requirements. This modification allows for the installation of a rail dump pit with associated conveyor system and a dedicated baghouse without increasing the annual throughput or allowable particulate emissions.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
FAYETTE COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 01-12141

Fac ID: 0124000088

DATE: 5/24/2007

Cargill AgHorizons
Ben Henegar
4201 State Road 238 NE
Bloomingsburg, OH 43106

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$375** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO

KY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **01-12141** FOR AN AIR CONTAMINANT SOURCE
FOR **Cargill AgHorizons**

On 5/24/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Cargill AgHorizons**, located at **420 SR 238 NE, PO Box A, Bloomingburg**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12141:

Rail receiving and handling.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 122 South Front St, P.O. Box 1049, Columbus, OH 43216-1049 [(614)728-3778]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-12141

Application Number: 01-12141
Facility ID: 0124000088
Permit Fee: **To be entered upon final issuance**
Name of Facility: Cargill AgHorizons
Person to Contact: Ben Henegar
Address: 4201 State Road 238 NE
Bloomington, OH 43106

Location of proposed air contaminant source(s) [emissions unit(s)]:

**420 SR 238 NE, PO Box A
Bloomington, Ohio**

Description of proposed emissions unit(s):

Rail receiving and handling.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

Cargill AgHorizons
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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

Cargill AgHorizons

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	5.60
PM10	1.40

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (F005) - Grain receiving, handling, transferring and conveying including dump pits, conveyors, elevators and bins vented to three baghouses; modification to PTI 01-01343 issued 11/21/2006.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See Section A.2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD) OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	Particulate Emissions (PE) from stack and fugitive emissions shall not exceed 5.60 tons per year, based on a rolling, 12-month summation of emissions. Particulate Matter less than ten microns in diameter (PM10) from stack and fugitive emissions shall not exceed 1.40 tons per year, based on a rolling, 12-month summation of emissions. See Section B.1 below.
40 CFR Part 60 Subpart DD	Visible emissions of fugitive dust from grain handling operations shall not exceed 0 percent opacity. The PE from the stack(s) of each baghouse serving this emissions units shall not exceed 0.01 grains per dry standard cubic feet (gr/dscf). Visible PE from the stack(s) of each baghouse serving this emission unit shall not exceed 0 percent opacity.
OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart DD.
OAC rule 3745-17-07(B)	See Section A.2.b below.
OAC rule 3745-17-08(B)	See Section A.2.c below.
OAC rule 3745-17-11(B)(3)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart DD (based on Figure II).

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2. Additional Terms and Conditions

- 2.a** "The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and PM10 from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.01 gr/dscf under 40 CFR Part 60 Subpart DD.
- 2.b** This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c** Cargill Ag Horizons is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

B. Operational Restrictions

- 1. The maximum annual grain throughput for this emissions unit shall not exceed 47,616,786 bushels (1,333,272 tons) based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the grain throughput for this emissions unit; therefore, the first year of accumulating monthly grain throughput limitations is not necessary.

C. Monitoring and/or Recordkeeping Requirements

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

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

Emissions Unit ID: F005

the investigation, and the findings and recommendations.

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

The acceptable range for the pressure drop across each baghouse shall be based on the manufacturer's specifications until such time as any required emission testing is conducted.

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

2. The permittee shall maintain monthly records of the following information:
 - a. the grain throughput in bushels; and
 - b. the rolling, 12-month summation of the grain throughput in bushels.
3. 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(s) of each baghouse 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;

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- b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from any egress points (i.e., windows, doors, roof monitors, vents, and access panels etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of PE and PM10 emissions.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during operation of this emission unit.
- a. each period of time when the pressure drop across each baghouse was outside of the range specified by the manufacturer;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all

Emissions Unit ID: F005

exceedances of the rolling, 12-month limitation on grain throughput. These reports shall be submitted in accordance with the reporting requirements specified in Part 1- General Terms and Conditions, Section A of this permit.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack(s) of each baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office (CDO) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the grain conveyors and any egress points (i.e. windows, doors, roof monitors, vents & access panels etc.) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, CDO by January 31 and July 31 of each year and shall cover the previous 6-month period.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on PE and PM10 emissions. These reports shall be submitted in accordance with the reporting requirements specified in Part 1- General Terms and Conditions, Section A of this permit.
6. The permittee shall submit annual reports by April 15th that specify the total PE and PM10 emissions from this emissions unit for the previous calendar year. The reporting requirement may be satisfied by including this emission data in the annual fee emission report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation
Particulate Emissions (PE) from stack and fugitive emissions shall not exceed 1.28 lb/hr and 5.60 tons per year, based on a rolling, 12-month summation of emissions.

Applicable Compliance Method

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The calculated annual emission rate was determined by multiplying the hourly emission rates (determined by the calculations below) by the maximum annual number of hours of operation (8760hrs/yr), and dividing by 2000lbs/ton.

Compliance with the rolling, 12-month limitation shall be assumed as long as compliance with the maximum grain throughput limitation of 47,616,786 bushels (1,333,272 tons) is maintained as recorded in section C.2 above.

Stack Emissions

<u>Source</u>	<u>Max. Throughput</u>	<u>AP-42 Factor (lb/ton)</u>	<u>Capture Efficiency</u>	<u>Bag House Control Efficiency</u>	<u>PE Emissions (lb/hr)</u>
Dump Pit (Hopper Truck and Rail) (#1, #2 and #3)	152.2 tons/hr	0.035	80%	99%	0.04
Grain Legs and Conveyors	152.2 tons/hr	0.061	100%	99%	0.09
Storage Bins	152.2 tons/hr	0.025	100%	99%	0.04
Blend Bins	152.2 tons/hr	0.025	100%	99%	0.04
Total Stack Emissions: 0.21 lb PE/hr					

Fugitive Emissions

<u>Source</u>	<u>Max. Throughput</u>	<u>AP-42 Factor (lb/ton)</u>	<u>Capture Efficiency</u>	<u>Bag House Control Efficiency</u>	<u>PE Emissions (lb/hr)</u>
Dump Pit (Hopper Truck and Rail) (#1, #2 and #3)	152.2 tons/hr	0.035	20%	N/A	1.07
Total Fugitive Emissions: 1.07 lb PE/hr					

Total Stack Emissions (0.21 lbs/hr) + total fugitive emissions (1.07 lbs/hr) = 1.28 lbs PE/hr total emissions.

1.28 lbs PE/hr * 8760 hr/yr * 1 Ton/2000 lb = 5.60 TPY PE.

Emission factors taken from AP-42, 5th Edition, Section 9.9.1, 5/03.

b. Emission Limitation

PM10 from stack and fugitive emissions shall not exceed 0.32 lb/hr and 1.40 tons per year, based on a rolling, 12-month summation of emissions.

Applicable Compliance Method

The calculated annual emission rate was determined by multiplying the hourly emission rates (determined by the calculations below) by the maximum annual number of hours of operation (8760hrs/yr), and dividing by 2000lbs/ton.

Compliance with the rolling, 12-month limitation shall be assumed as long as compliance with the maximum grain throughput limitation of 47,616,786 bushels (1,333,272 tons) is maintained as recorded in section C.2 above.

Stack Emissions

<u>Source</u>	<u>Max. Throughput</u>	<u>AP-42 Factor (lb/ton)</u>	<u>Capture Efficiency</u>	<u>Bag House Control Efficiency</u>	<u>PM10 Emissions (lb/hr)</u>
Dump Pit (Hopper Truck and Rail) (#1, #2 and #3)	152.2 tons/hr	0.0078	80%	99%	0.01
Grain Legs and Conveyors	152.2 tons/hr	0.034	100%	99%	0.05
Storage Bins	152.2 tons/hr	0.0063	100%	99%	0.01
Blend Bins	152.2 tons/hr	0.0063	100%	99%	0.01
Total Stack Emissions:					0.08 lb PM10/hr

Fugitive Emissions

<u>Source</u>	<u>Max. Throughput</u>	<u>AP-42 Factor (lb/ton)</u>	<u>Capture Efficiency</u>	<u>Bag House Control Efficiency</u>	<u>PM10 Emissions (lb/hr)</u>
Dump Pit (Hopper Truck and Rail) (#1, #2 and #3)	152.2 tons/hr	0.0078	20%	99%	0.24
Total Stack Emissions:					0.24 lb PM10/hr

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Total Stack Emissions (0.08 lbs/hr) + total fugitive emissions (0.24 lbs/hr) = 0.32 lbs PM10/hr total emissions.

0.32 lbs PE/hr * 8760 hr/yr * 1 Ton/2000 lb = 1.40 TPY PE.

Emission factors taken from AP-42, 5th Edition, Section 9.9.1, 5/03.

- c. Emissions Limitation
Visible PE from the stack(s) of each baghouse serving this emission unit shall not exceed 0 percent opacity.

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Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

d. Emission Limitation

Visible emissions of fugitive dust from grain handling operations shall not exceed 0 percent opacity.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

e. Emission Limitation

The PE from the stack(s) of each baghouse serving this emissions unit shall not exceed 0.01 grains per dry standard cubic feet (gr/dscf).

Applicable Compliance Method

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

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE in gr/dscf.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

<u>Pollutant</u>	<u>Test Method</u>	<u>Location</u>
Particulates	Methods 1-5	40 <u>CFR</u> Part 60, Appendix A as identified in Subpart DD.
Opacity	Method 9	40 <u>CFR</u> Part 60, Appendix A as identified in Subpart DD.

Alternative U.S. EPA approved test methods may be used with prior

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approval from the Ohio EPA.

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

F. Miscellaneous Requirements

- 1. The terms and conditions for this emissions unit supercede those identified in PTI 01-01343 issued 11/21/2006.

Cargill AgHorizons
PTI Application: 01-12141
Issued: To be entered upon final issuance

Facility ID: 012400088

Emissions Unit ID: **F005**

SIC CODE SCC CODE EMISSIONS UNIT ID

EMISSIONS UNIT DESCRIPTION

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.01 gr/dscf	5.60	0.01 gr/dscf	5.60
PM ₁₀			1.40		1.40
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? **DD** PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No, <10TPY PM10

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS: