



State of Ohio Environmental Protection Agency

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

9/22/2009

Mr. Delin Johnson  
CARGILL INC - BLOOMINGBURG  
4201 State Route 238 NE  
PO Box A  
Bloomington, OH 43106

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0124000088  
Permit Number: P0104588  
Permit Type: OAC Chapter 3745-31 Modification  
County: Fayette

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

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

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

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

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

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

Cc: Ohio EPA-CDO

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  
CARGILL INC - BLOOMINGBURG**

Facility ID: 0124000088  
Permit Number: P0104588  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 9/22/2009  
Effective: 9/22/2009  
Expiration: 9/22/2014





**Air Pollution Permit-to-Install and Operate**  
for  
**CARGILL INC - BLOOMINGBURG**

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104588  
**Facility ID:** 0124000088  
**Effective Date:** 9/22/2009

## Authorization

Facility ID: 0124000088  
Application Number(s): A0037041  
Permit Number: P0104588  
Permit Description: Chapter 31 permit modification to increase throughput from 47.6 million bushels per year to 51 million bushels per year and include synthetic minor operational restrictions in order to avoid the Title V permitting program.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$3,000.00  
Issue Date: 9/22/2009  
Effective Date: 9/22/2009  
Expiration Date: 9/22/2014  
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15  
This document constitutes issuance to:

CARGILL INC - BLOOMINGBURG  
4201 STATE RTE 238 N E  
BLOOMINGBURG, OH 43106

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

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

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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: P0104588  
 Permit Description: Chapter 31 permit modification to increase throughput from 47.6 million bushels per year to 51 million bushels per year and include synthetic minor operational restrictions in order to avoid the Title V permitting program.

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

- |                                   |  |
|-----------------------------------|--|
| <b>Emissions Unit ID:</b>         | <b>F005</b>                            |
| Company Equipment ID:             | LEGS, SCREW, BELT AND ENMASS CONVEYORS |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                         |
| <b>Emissions Unit ID:</b>         | <b>F008</b>                            |
| Company Equipment ID:             | ZIMMERMAN GRAIN DRYER                  |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                         |
| <b>Emissions Unit ID:</b>         | <b>F009</b>                            |
| Company Equipment ID:             | TRUCK LOAD OUT SPOUT                   |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                         |
| <b>Emissions Unit ID:</b>         | <b>F010</b>                            |
| Company Equipment ID:             | Zimmerman #2                           |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                         |
| <b>Emissions Unit ID:</b>         | <b>F011</b>                            |
| Company Equipment ID:             | FS104                                  |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                         |
| <b>Emissions Unit ID:</b>         | <b>F013</b>                            |
| Company Equipment ID:             | FS103                                  |
| Superseded Permit Number:         |  |
| General Permit Category and Type: | Not Applicable                         |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104588

**Facility ID:** 0124000088

**Effective Date:** 9/22/2009

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC



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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

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**Effective Date:** 9/22/2009

**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:** P0104588

**Facility ID:** 0124000088

**Effective Date:** 9/22/2009

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**

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**Effective Date:** 9/22/2009

## **C. Emissions Unit Terms and Conditions**



**1. F005, LEGS, SCREW, BELT AND ENMASS CONVEYORS**

**Operations, Property and/or Equipment Description:**

Grain receiving, handling, transferring and conveying including dump pits, conveyors, elevators and bins vented to three baghouses

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), d)(1), e)(1), f)(1)a., and f)(1)b.

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.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD) (Synthetic minor to avoid Title V)	Stack and fugitive PE shall not exceed 5.64 tons per rolling, 12-month period.  Stack and fugitive PM <sub>10</sub> emissions shall not exceed 1.39 tons per rolling, 12-month period.  See b)(2)e. and c)(1) below.
c.	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.
d.	OAC rule 3745-17-07(B)	See b)(2)c. below.
e.	OAC rule 3745-17-08(A)(1)	See b)(2)d. below.
f.	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.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 60, Subpart DD	<p>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).</p> <p>Visible emissions of fugitive dust from grain handling operations associated with this emissions unit shall not exceed 0 percent opacity.</p> <p>Visible emissions from the stack(s) of each baghouse serving this emission unit shall not exceed 0 percent opacity.</p> <p>Visible emissions of fugitive dust from receiving operations associated with this emissions unit shall not exceed 5 percent opacity.</p>
h.	40 CFR Part 60, Subpart A	See b)(2)f. below.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than 10 tons/year, taking into account the federally enforceable rule limit of 5.64 tons per rolling, 12-month period under OAC rule 3745-31-05(D). See c)(1) below.
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter less than ten microns in diameter (PM<sub>10</sub>) emissions from this air contaminant source since the calculated annual emission rate for PM<sub>10</sub> is less than 10 tons/year, taking into account the federally enforceable rule limit of 1.39 tons per rolling, 12-month period under OAC rule 3745-31-05(D). See c)(1) below.
- c. 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).
- d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- e. The emissions from the receiving operations associated with this emissions unit shall be vented to a baghouse(s) at all times when the emissions unit is in operation.



- f. The permittee shall demonstrate compliance with the applicable limitations identified in 40 CFR Part 60, Subpart DD in accordance with the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (60.1-60.19).
- c) Operational Restrictions
  - (1) The maximum combined grain throughput for grain received by truck and grain received by rail shall not exceed 51,000,000 bushels (1,428,000 tons) per rolling, 12-month period.
- d) 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. Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain monthly records of the following information:
    - a. the grain throughput, in bushels;
    - b. the rolling, 12-month summation of the grain received by rail, in bushels;
    - c. the rolling, 12-month summation of the grain received by truck, in bushels; and
    - d. the rolling, 12-month summation of grain handling, in bushels (the summation of d)(1)b. and d)(1)c. above).
  - (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable ranges established for the pressure drop across the baghouses are identified below:
    - a. for dust system 1, the acceptable range is between 1 and 6 inches of water;
    - b. for dust system 2, the acceptable range is between 0.5 and 6 inches of water; and
    - c. for dust system 3, the acceptable range is between 1 and 6 inches of water.
  - (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse(s) on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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



- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

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

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

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

- (4) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the grain handling operations associated with 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 perform daily checks, when the emissions unit is in operation, for any visible particulate emissions from the stack(s) of each baghouse serving this emission 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.
- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the receiving operations associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. each rolling, 12-month period when the combined grain throughput limitation of 51,000,000 bushels for grain received by truck and grain received by rail was exceeded; each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the acceptable range; and
- ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse(s);
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Central District Office).

- (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 emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

PE from stack and fugitive emissions shall not exceed 5.64 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements identified in d)(1) and the following equations:

$$\text{Total PE} = \text{Receiving fugitive PE} + \text{Receiving stack PE} + \text{Handling fugitive PE}$$

where,

$$\text{Receiving fugitive PE} = \text{truck receiving fugitive PE} + \text{rail receiving fugitive PE}$$



$$\text{truck receiving fugitive PE} = \text{grain throughput} * \text{CF} * \text{EF} * 20\%$$

CF = bushels to tons conversion factor (0.028)

EF = AP-42<sup>#</sup> emissions factor (0.035)

$$\text{rail receiving fugitive PE} = \text{grain throughput} * \text{CF} * \text{EF} * 20\%$$

CF = bushels to tons conversion factor (0.028)

EF = AP-42<sup>#</sup> emissions factor (0.032)

$$\text{Receiving stack PE} = \text{truck receiving stack PE} + \text{rail receiving stack PE}$$

$$\text{truck receiving stack PE} = \text{grain throughput} * \text{CF} * \text{EF} * 80\% * (1-CE)$$

CF = bushels to tons conversion factor (0.028)

EF = AP-42<sup>#</sup> emissions factor (0.035)

CE = control efficiency (99%)

$$\text{rail receiving stack PE} = \text{grain throughput} * \text{CF} * \text{EF} * 80\% * (1-CE)$$

CF = bushels to tons conversion factor (0.028)

EF = AP-42<sup>#</sup> emissions factor (0.032)

CE = control efficiency (99%)

$$\text{Handling fugitive PE} = \text{grain throughput} * \text{CF} * \text{EF}$$

CF = bushels to tons conversion factor (0.028)

EF = AP-42<sup>#</sup> emissions factor (0.061)

- b. # - AP-42, Volume I, Fifth Edition, Section 9.9, "Grain Processing", Table 9.9.1-1, March 2003. Emissions Limitation:

PM<sub>10</sub> from stack and fugitive emissions shall not exceed 1.39 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements identified in d)(1) and the following equations:

$$\text{Total PM}_{10} = \text{Receiving fugitive PM}_{10} + \text{Receiving stack PM}_{10} + \text{Handling fugitive PM}_{10}$$

where,

$$\text{Receiving fugitive PM}_{10} = \text{truck receiving fugitive PM}_{10} + \text{rail receiving fugitive PM}_{10}$$

$$\text{truck receiving fugitive PM}_{10} = \text{grain throughput} * \text{CF} * \text{EF} * 20\%$$

CF = bushels to tons conversion factor (0.028)

EF = AP-42<sup>#</sup> emissions factor (0.078)



rail receiving fugitive  $PM_{10}$  = grain throughput \* CF \* EF \* 20%

CF = bushels to tons conversion factor (0.028)  
 EF = AP-42# emissions factor (0.078)

Receiving stack  $PM_{10}$  = truck receiving stack  $PM_{10}$  + rail receiving stack PE

truck receiving stack  $PM_{10}$  = grain throughput \* CF \* EF \* 80% \* (1-CE)

CF = bushels to tons conversion factor (0.028)  
 EF = AP-42# emissions factor (0.078)  
 CE = control efficiency (99%)

rail receiving stack  $PM_{10}$  = grain throughput \* CF \* EF \* 80% \* (1-CE)

CF = bushels to tons conversion factor (0.028)  
 EF = AP-42# emissions factor (0.078)  
 CE = control efficiency (99%)

Handling fugitive  $PM_{10}$  = grain throughput \* CF \* EF

CF = bushels to tons conversion factor (0.028)  
 EF = AP-42# emissions factor (0.034)

# - AP-42, Volume I, Fifth Edition, Section 9.9, "Grain Processing", Table 9.9.1-1, March 2003.

c. Emissions 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:

If required, compliance with the grain loading limitation shall be demonstrated according to 40 CFR Part 60, Appendix A, method 5.

d. Emissions Limitation:

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

Applicable Compliance Method:

Compliance with the visible emission limitation for the fugitive dust from grain handling operations associated with this emissions unit shall be determined in accordance with U.S. EPA Method 22.

e. Emissions Limitation:

Visible emissions from the stack(s) of each baghouse serving this emission unit shall not exceed 0 percent opacity.



Applicable Compliance Method:

Compliance with the visible emission limitation for the stack(s) of each baghouse serving this emission unit shall be determined in accordance with U.S. EPA Method 22.

f. Emissions Limitation:

Visible emissions of fugitive dust from receiving operations associated with this emissions unit shall not exceed 5 percent opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the fugitive dust from receiving operations associated with this emissions unit shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.



**2. F008, ZIMMERMAN GRAIN DRYER**

**Operations, Property and/or Equipment Description:**

Zimmerman grain dryer no. 1

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c., b)(2)d., c)(2), c)(3), d)(2), e)(1), f)(1)d. and f)(1)e.
- 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.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)	Nitrogen oxide (NO <sub>x</sub> ) emissions from the combustion of natural gas in this emissions unit shall not exceed 3.21 pounds per hour (lbs/hr).  Particulate emissions (PE) from the combustion of natural gas in this emissions unit shall not exceed 0.24 lb/hr.  PE from the grain drying process shall not exceed 8.74 lbs/hr.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b. and b)(2)c. below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD) (Synthetic minor to avoid Title V)	See b)(2)d., c)(2) and c)(3) below.
d.	OAC rule 3745-17-07(B)	See b)(2)e. below.
e.	OAC rule 3745-17-08(A)(1)	See b)(2)f. below.
f.	40 CFR Part 60, Subpart DD	This emissions unit is exempt from Subpart DD because the column plate



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		perforations are smaller than 2.4 mm in diameter.

(2) Additional Terms and Conditions

- a. The hourly NO<sub>x</sub> and PE limitations for this emissions unit were established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the carbon monoxide (CO), volatile organic compound (VOC), particulate matter less than ten microns in diameter (PM<sub>10</sub>) and sulfur dioxide (SO<sub>2</sub>) emissions from the combustion of natural gas in this air contaminant source since the calculated annual emission rate for these pollutants is less than 10 tons/year, taking into account the federally enforceable rule limits established under OAC rule 3745-31-05(D) identified in b)(2)d. below.
- c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> emissions from the grain drying process associated with this air contaminant source since the calculated annual emission rate for PM<sub>10</sub> is less than 10 tons/year, taking into account the federally enforceable rule limits established under OAC rule 3745-31-05(D) identified in b)(2)d. below.
- d. The following federally enforceable emissions limitations apply to the combustion of natural gas in emissions units F008 and F010 combined:
  - i. CO emissions shall not exceed 9.03 tons per rolling, 12-month period;
  - ii. NO<sub>x</sub> emissions shall not exceed 10.75 tons per rolling, 12-month period;
  - iii. VOC emissions shall not exceed 0.59 ton per rolling, 12-month period;
  - iv. PE shall not exceed 0.82 ton per rolling, 12-month period; and
  - v. SO<sub>2</sub> emissions shall not exceed 0.06 ton per rolling, 12-month period.

The following federally enforceable emissions limitations apply to the emissions from the grain drying process associated with emissions units F008 and F010 combined:

- i. PE shall not exceed 14.56 tons per rolling, 12-month period; and
- ii. PM<sub>10</sub> shall not exceed 3.64 tons per rolling, 12-month period.
- e. 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).
- f. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which



requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) This emissions unit shall burn only natural gas.
- (2) The maximum natural gas usage for grain dryers F008 and F010 combined shall not exceed 215 million cubic feet (MMcf) per rolling, 12-month period. The permittee has existing records of the natural gas usage for this emissions unit, therefore, the first year of accumulating monthly natural gas usage limitations is not necessary.
- (3) The maximum grain throughput for F008 and F010 combined shall not exceed 10,000,000 bushels (280,000 tons) per rolling, 12-month period. 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for F008 and F010 combined:
  - a. the natural gas usage, in MMcf;
  - b. the rolling, 12-month natural gas usage, in MMcf.
  - c. the grain throughput, in bushels; and
  - d. the rolling, 12-month grain throughput, in bushels.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. each day when a fuel other than natural gas was burned in this emissions unit;
    - ii. each rolling, 12-month period when the combined natural gas usage limitation of 215 MMcf for F008 and F010 was exceeded; and
    - iii. each rolling, 12-month period when the combined grain throughput limitation of 10,000,000 bushels for F008 and F010 was exceeded.



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Central District Office).

- (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 emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

NO<sub>x</sub> emissions from the combustion of natural gas in this emissions unit shall not exceed 3.21 lbs/hr.

Applicable Compliance Method:

The potential to emit for NO<sub>x</sub> was established by multiplying the maximum heating capacity (32.8 MMBtu/hr) by the AP-42 emission factor\* (0.0980 lb NO<sub>x</sub>/MMBtu).

\* AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4-1 and 1.4-2, July 1998.

- b. Emissions Limitation:

PE from the combustion of natural gas in this emissions unit shall not exceed 0.24 lb/hr.

Applicable Compliance Method:

The potential to emit for PE was established by multiplying the maximum heating capacity (32.8 MMBtu/hr) by the AP-42 emission factor\* (0.00745 lb PE/MMBtu).



c. Emissions Limitation:

PE from the grain drying process shall not exceed 8.74 lbs/hr.

Applicable Compliance Method:

The potential to emit for PE was established by multiplying the maximum throughput (84 tons per hour) by the emission factor\* (0.104 lb PE/ton throughput).

\*Manufacturer's supplied performance testing data.

d. Emissions Limitation:

Combined emissions from the combustion of natural gas in grain dryers F008 and F010 shall not exceed the following limitations:

CO emissions shall not exceed 9.03 tons per rolling, 12-month period;  
NO<sub>x</sub> emissions shall not exceed 10.75 tons per rolling, 12-month period;  
VOC emissions shall not exceed 0.59 ton per rolling, 12-month period;  
PE emissions shall not exceed 0.82 ton per rolling, 12-month period; and  
SO<sub>2</sub> emissions shall not exceed 0.06 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual natural gas usage required in d)(2)a. by the following emissions factors:

<u>Pollutant</u>	<u>Emissions Factor*</u>
CO	84 lbs/MMcf
NO <sub>x</sub>	100 lbs/MMcf
VOC	5.5 lbs/MMcf
PE	5.7 lbs/MMcf
SO <sub>2</sub>	0.6 lb/MMcf

\*AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4-1 and 1.4-2, July 1998.

e. Emissions Limitation:

Combined emissions from the grain drying process associated with emissions units F008 and F010 shall not exceed the following limitations:

PE shall not exceed 14.56 tons per rolling, 12-month period; and  
PM<sub>10</sub> shall not exceed 3.64 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual grain throughput required in d)(2)c. by the following emissions factors:



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<u>Pollutant</u>	<u>Emissions Factor</u>
PE	0.104 lbs PE/ton*
PM <sub>10</sub>	0.026 lbs PM <sub>10</sub> /ton**

\*Manufacturer's supplied performance testing data.

\*\*Assumes PM<sub>10</sub> represents 25% of PE, consistent with AP-42 guidance.

g) Miscellaneous Requirements

- (1) None.



**3. F009, TRUCK LOAD OUT SPOUT**

**Operations, Property and/or Equipment Description:**

Shipping and loadout spouts to truck and rail

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c)(1), d)(1), e)(1) and f)(1)a. & b.
- 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.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a. below.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD) (Synthetic minor to avoid Title V)	PE shall not exceed 61.40 tons per rolling, 12-month period.  PM <sub>10</sub> emissions shall not exceed 20.71 tons per rolling, 12-month period.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08(A)(1)	See b)(2)c. below.
e.	40 CFR Part 60, Subpart DD	Visible emissions of fugitive dust from truck loadout operations associated with this emissions unit shall not exceed 10 percent opacity.  Visible emissions of fugitive dust from rail loadout operations associated with this emissions unit shall not exceed 5 percent opacity.
f.	40 CFR Part 60, Subpart A	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter less than ten microns in diameter (PM<sub>10</sub>) and particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for these pollutants is less than 10 tons/year, taking into account the federally enforceable rule limits established under OAC rule 3745-31-05(D). See c)(1) below.
- 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).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The permittee shall demonstrate compliance with the applicable limitations identified in 40 CFR Part 60, Subpart DD in accordance with the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (60.1-60.19).

c) Operational Restrictions

- (1) The maximum grain throughput for this emissions unit shall not exceed 51,000,000 bushels (1,428,000 tons) per rolling, 12-month period.

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.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the loadout operations associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;



- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. each rolling, 12-month period when the grain throughput limitation of 51,000,000 bushels was exceeded.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) 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 emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE shall not exceed 61.40 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation may be determined through the recordkeeping required in d)(1) and the following calculations:

$PE = (\text{Grain throughput} * CF * EF) / 2000$  where,  
PE = Actual particulate emissions, in tons per rolling, 12- month period  
CF = Conversion factor from bushels to tons (0.028 tons per bushel)  
EF = AP-42 emissions factor (0.086 pounds PE/ton) (AP-42, Volume I, Fifth Edition, Section 9.9, "Grain Elevators and Processes", Table 9.9.1-1, March 2003)

b. Emissions Limitation:

PM<sub>10</sub> emissions shall not exceed 20.71 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation may be determined through the recordkeeping required in d)(1) and the following calculations:

$PM_{10} = (\text{Grain throughput} * CF * EF) / 2000$  where,  
PM<sub>10</sub> = Actual PM<sub>10</sub> emissions, in tons per rolling, 12- month period  
CF = Conversion factor from bushels to tons (0.028 tons per bushel)  
EF = AP-42 emissions factor (0.029 pounds PM<sub>10</sub>/ton) (AP-42, Volume I, Fifth Edition, Section 9.9, "Grain Elevators and Processes", Table 9.9.1-1, March 2003)

c. Emissions Limitation:

Visible emissions of fugitive dust from truck loadout operations associated with this emissions unit shall not exceed 10 percent opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the fugitive dust from receiving operations associated with this emissions unit shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emissions Limitation:

Visible emissions of fugitive dust from rail loadout operations associated with this emissions unit shall not exceed 5 percent opacity.



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Applicable Compliance Method:

If required, compliance with the visible emission limitation for the fugitive dust from receiving operations associated with this emissions unit shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.



**4. F010, Zimmerman #2**

**Operations, Property and/or Equipment Description:**

Zimmerman grain dryer no. 2

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c., b)(2)d., c)(2), c)(3), d)(2), e)(1), f)(1)d. and f)(1)e.
- 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.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)	Nitrogen oxide (NO <sub>x</sub> ) emissions from the combustion of natural gas in this emissions unit shall not exceed 3.21 pounds per hour (lbs/hr).  Particulate emissions (PE) from the combustion of natural gas in this emissions unit shall not exceed 0.24 lb/hr.  PE from the grain drying process shall not exceed 8.74 lbs/hr.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b. and b)(2)c. below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD) (Synthetic minor to avoid Title V)	See b)(2)d., c)(2) and c)(3) below.
d.	OAC rule 3745-17-07(B)	See b)(2)e. below.
e.	OAC rule 3745-17-08(A)(1)	See b)(2)f. below.
f.	40 CFR Part 60, Subpart DD	This emissions unit is exempt from Subpart DD because the column plate



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		perforations are smaller than 2.4 mm in diameter.

(2) Additional Terms and Conditions

- a. The hourly NO<sub>x</sub> and PE limitations for this emissions unit were established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the carbon monoxide (CO), volatile organic compound (VOC), particulate matter less than ten microns in diameter (PM<sub>10</sub>) and sulfur dioxide (SO<sub>2</sub>) emissions from the combustion of natural gas in this air contaminant source since the calculated annual emission rate for these pollutants is less than 10 tons/year, taking into account the federally enforceable rule limits established under OAC rule 3745-31-05(D) identified in b)(2)d. below.
- c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> emissions from the grain drying process associated with this air contaminant source since the calculated annual emission rate for PM<sub>10</sub> is less than 10 tons/year, taking into account the federally enforceable rule limits established under OAC rule 3745-31-05(D) identified in b)(2)d. below.
- d. The following federally enforceable emissions limitations apply to the combustion of natural gas in emissions units F008 and F010 combined:
  - i. CO emissions shall not exceed 9.03 tons per rolling, 12-month period;
  - ii. NO<sub>x</sub> emissions shall not exceed 10.75 tons per rolling, 12-month period;
  - iii. VOC emissions shall not exceed 0.59 ton per rolling, 12-month period;
  - iv. PE shall not exceed 0.82 ton per rolling, 12-month period; and
  - v. SO<sub>2</sub> emissions shall not exceed 0.06 ton per rolling, 12-month period.

The following federally enforceable emissions limitations apply to the emissions from the grain drying process associated with emissions units F008 and F010 combined:

- i. PE shall not exceed 14.56 tons per rolling, 12-month period; and
- ii. PM<sub>10</sub> shall not exceed 3.64 tons per rolling, 12-month period.
- e. 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).
- f. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which



requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) This emissions unit shall burn only natural gas.
- (2) The maximum natural gas usage for grain dryers F008 and F010 combined shall not exceed 215 million cubic feet (MMcf) per rolling, 12-month period. The permittee has existing records of the natural gas usage for this emissions unit, therefore, the first year of accumulating monthly natural gas usage limitations is not necessary.
- (3) The maximum grain throughput for F008 and F010 combined shall not exceed 10,000,000 bushels (280,000 tons) per rolling, 12-month period. 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for F008 and F010 combined:
  - a. the natural gas usage, in MMcf;
  - b. the rolling, 12-month natural gas usage, in MMcf.
  - c. the grain throughput, in bushels; and
  - d. the rolling, 12-month grain throughput, in bushels.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. each day when a fuel other than natural gas was burned in this emissions unit;
    - ii. each rolling, 12-month period when the combined natural gas usage limitation of 215 MMcf for F008 and F010 was exceeded; and
    - iii. each rolling, 12-month period when the combined grain throughput limitation of 10,000,000 bushels for F008 and F010 was exceeded.



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) 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 emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

NO<sub>x</sub> emissions from the combustion of natural gas in this emissions unit shall not exceed 3.21 lbs/hr.

Applicable Compliance Method:

The potential to emit for NO<sub>x</sub> was established by multiplying the maximum heating capacity (32.8 MMBtu/hr) by the AP-42 emission factor\* (0.0980 lb NO<sub>x</sub>/MMBtu).

\* AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4-1 and 1.4-2, July 1998.

- b. Emissions Limitation:

PE from the combustion of natural gas in this emissions unit shall not exceed 0.24 lb/hr.

Applicable Compliance Method:

The potential to emit for PE was established by multiplying the maximum heating capacity (32.8 MMBtu/hr) by the AP-42 emission factor\* (0.00745 lb PE/MMBtu).



c. Emissions Limitation:

PE from the grain drying process shall not exceed 8.74 lbs/hr.

Applicable Compliance Method:

The potential to emit for PE was established by multiplying the maximum throughput (84 tons per hour) by the emission factor\* (0.104 lb PE/ton throughput).

\*Manufacturer's supplied performance testing data.

d. Emissions Limitation:

Combined emissions from the combustion of natural gas in grain dryers F008 and F010 shall not exceed the following limitations:

CO emissions shall not exceed 9.03 tons per rolling, 12-month period;  
NO<sub>x</sub> emissions shall not exceed 10.75 tons per rolling, 12-month period;  
VOC emissions shall not exceed 0.59 ton per rolling, 12-month period;  
PE emissions shall not exceed 0.82 ton per rolling, 12-month period; and  
SO<sub>2</sub> emissions shall not exceed 0.06 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual natural gas usage required in d)(2)a. by the following emissions factors:

<u>Pollutant</u>	<u>Emissions Factor*</u>
CO	84 lbs/MMcf
NO <sub>x</sub>	100 lbs/MMcf
VOC	5.5 lbs/MMcf
PE	5.7 lbs/MMcf
SO <sub>2</sub>	0.6 lb/MMcf

\*AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4-1 and 1.4-2, July 1998.

e. Emissions Limitation:

Combined emissions from the grain drying process associated with emissions units F008 and F010 shall not exceed the following limitations:

PE shall not exceed 14.56 tons per rolling, 12-month period; and  
PM<sub>10</sub> shall not exceed 3.64 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual grain throughput required in d)(2)c. by the following emissions factors:



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104588

**Facility ID:** 0124000088

**Effective Date:** 9/22/2009

<u>Pollutant</u>	<u>Emissions Factor</u>
PE	0.104 lbs PE/ton*
PM <sub>10</sub>	0.026 lbs PM <sub>10</sub> /ton**

\*Manufacturer's supplied performance testing data.

\*\*Assumes PM<sub>10</sub> represents 25% of PE, consistent with AP-42 guidance.

g) Miscellaneous Requirements

- (1) None.



**5. F011, FS104**

**Operations, Property and/or Equipment Description:**

Storage piles, including load-in, load-out and wind erosion

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), d)(1), e)(1) and f)(1)

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.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD) (Synthetic minor to avoid Title V)	PE shall not exceed 6.72 tons per rolling, 12-month period.  PM <sub>10</sub> emissions shall not exceed 5.18 tons per rolling, 12-month period.  See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)c. below.
d.	OAC rule 3745-17-08(A)(1)	See b)(2)d. below.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than 10 tons/year, taking into account the federally enforceable rule limit of 6.72 tons per rolling, 12-month period under OAC rule 3745-31-05(D). See c)(1) below.



- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter less than ten microns in diameter (PM<sub>10</sub>) emissions from this air contaminant source since the calculated annual emission rate for PM<sub>10</sub> is less than 10 tons/year, taking into account the federally enforceable rule limit of 5.18 tons per rolling, 12-month period under OAC rule 3745-31-05(D). See c)(1) below.
  - c. 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).
  - d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- c) Operational Restrictions
- (1) The maximum grain throughput for this emissions unit shall not exceed 51,000,000 bushels (1,428,000 tons) per rolling, 12-month period.  
  
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.
- d) Monitoring and/or Recordkeeping Requirements
- (1) 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.
  - (2) The permittee shall maintain daily records that indicate whether the storage pile was or was not covered for the purpose of calculating emissions from wind erosion across the storage pile.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. each rolling, 12-month period when the grain throughput limitation of 51,000,000 bushels was exceeded.
    - b. the probable cause of each deviation (excursion);



- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) 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 emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

PE shall not exceed 6.72 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation may be determined through the recordkeeping required in d)(1) and d)(2) and the following calculations:

Load-in:

PE = (Grain throughput \* CF \* EF)/2000 where,  
 PE = Actual particulate emissions, in tons per rolling, 12- month period  
 CF = Conversion factor from bushels to tons (0.028 ton per bushel)  
 EF = AP-42 emissions factor (0.00205 lb PE/ton) (AP-42, Volume I, Fifth Edition, Section 13.2.4, "Aggregate Handling and Storage Piles", November 2006)

Load-out:

PE = (Grain throughput \* CF \* EF)/2000 where,  
 PE = Actual particulate emissions, in tons per rolling, 12- month period  
 CF = Conversion factor from bushels to tons (0.028 ton per bushel)  
 EF = AP-42 emissions factor (0.00205 lb PE/ton) (AP-42, Volume I, Fifth Edition, Section 13.2.4, "Aggregate Handling and Storage Piles", November 2006)

Wind erosion:

PE = (SA \* days of use \* EF)/2000 where,  
 PE = Actual particulate emissions, in tons per rolling, 12- month period



SA = Surface area, in acres (2)  
 EF = 10.42 lbs PM<sub>10</sub>/day/acre (EPA-450-2/92-004, Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures, September 1992)

For the purpose of determining emissions from wind erosion across the storage pile, 'days of use' shall only include those days when the storage pile was not covered as determined by recordkeeping requirement d)(2).

b. Emissions Limitation:

PM<sub>10</sub> emissions shall not exceed 5.18 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation may be determined through the recordkeeping required in d)(1) and d)(2) and the following calculations:

Load-in:

PM<sub>10</sub> = (Grain throughput \* CF \* EF)/2000 where,  
 PM<sub>10</sub> = Actual PM<sub>10</sub> emissions, in tons per rolling, 12- month period  
 CF = Conversion factor from bushels to tons (0.028 ton per bushel)  
 EF = AP-42 emissions factor (0.000969 lb PM<sub>10</sub>/ton) (AP-42, Volume I, Fifth Edition, Section 13.2.4, "Aggregate Handling and Storage Piles", November 2006)

Load-out:

PM<sub>10</sub> = (Grain throughput \* CF \* EF)/2000 where,  
 PM<sub>10</sub> = Actual PM<sub>10</sub> emissions, in tons per rolling, 12- month period  
 CF = Conversion factor from bushels to tons (0.028 ton per bushel)  
 EF = AP-42 emissions factor (0.000969 lb PM<sub>10</sub>/ton) (AP-42, Volume I, Fifth Edition, Section 13.2.4, "Aggregate Handling and Storage Piles", November 2006)

Wind erosion:

PM<sub>10</sub> = (SA \* days of use \* EF)/2000 where,  
 PM<sub>10</sub> = Actual PM<sub>10</sub> emissions, in tons per rolling, 12- month period  
 SA = Surface area, in acres (2)  
 EF = 10.42 lbs PM<sub>10</sub>/day/acre (EPA-450-2/92-004, Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures, September 1992)

For the purpose of determining emissions from wind erosion across the storage pile, 'days of use' shall only include those days when the storage pile was not covered as determined by recordkeeping requirement d)(2).

g) Miscellaneous Requirements

(1) None.



**6. F013, FS103**

**Operations, Property and/or Equipment Description:**

Paved 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.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(B)	See b)(2)c. below.
c.	OAC rule 3745-17-08(A)(1)	See b)(2)d. below.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than 10 tons/year, taking into account the federally enforceable rule limit of 51,000,000 bushels per rolling, 12-month period operational restriction that applies to emissions units F005 and F009 and the following voluntary restrictions as proposed by the permittee for the purpose of avoiding BAT under OAC rule 3745-31-05(A)(3)(a)(ii):

i. treatment of paved roadways and parking areas with water at sufficient treatment frequencies to prevent visible emissions of fugitive dust.



- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> emissions from this air contaminant source since the calculated annual emission rate for PM<sub>10</sub> is less than 10 tons/year, taking into account the federally enforceable rule limit of 51,000,000 bushels per rolling, 12-month period operational restriction that applies to emissions units F005 and F009.
- c. 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).
- d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

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 control measures identified in b)(2)a.i. above. 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 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 year 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.



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 emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

No visible PE from paved roadways and parking areas.

Applicable Compliance Method:

Compliance with the visible emission limitation for the fugitive dust from paved roadways and parking areas shall be based upon the record keeping requirements specified in d). If required, compliance shall be determined in accordance with U.S. EPA Method 22.

g) Miscellaneous Requirements

- (1) None.