



State of Ohio Environmental Protection Agency

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1/13/2010

Mel Holder
Bunge North America
234 S. Jefferson Street
P.O. Box 485
Delphos, OH 45833

Certified Mail

Facility ID: 0381000011
Permit Number: P0087745
County: Van Wert

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 11/16/2009. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter.

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

PRELIMINARY PROPOSED

Air Pollution Title V Permit for Bunge North America

Facility ID: 0381000011
Permit Number: P0087745
Permit Type: Renewal
Issued: 1/13/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Title V Permit
 for
 Bunge North America

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

Preliminary Proposed Title V Permit

Permit Number: P0087745

Facility ID: 0381000011

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0381000011

Facility Description: Soybean Oil and Soybean Meal Processing Facility

Application Number(s): A0018794, A0018795, A0018796

Permit Number: P0087745

Permit Description: Title V permit renewal

Permit Type: Renewal

Issue Date: 1/13/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Bunge North America
234 S. Jefferson Street
P.O. Box 485
Delphos, OH 45833

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087745

Facility ID: 0381000011

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b) 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c) The permittee shall submit required reports in the following manner:
 - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written 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.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.



These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.



If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))



6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee



shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.



- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the



Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
- (2) Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as



soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))



18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)



23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. 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, 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.

(Authority for term: OAC rule 3745-77-07(C))

27. 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).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087745

Facility ID: 0381000011

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087745

Facility ID: 0381000011

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) B.3.
2. The following emissions unit(s) contained in this permit are subject to 40 CFR, Part 63, Subpart GGGG: P031. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
3. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
 - a) K027 - Kaolin Receiving & Storage
 - b) P904 - Millfeed Storage
 - c) P905 - Fine Grind Meal Storage



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C. Emissions Unit Terms and Conditions



1. B001, Coal Fired Boiler

Operations, Property and/or Equipment Description:

Boiler - 69.4 mmBtu/hr, coal-fired (traveling grate) - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-10 (C)(2)	0.33 lb particulate emissions (PE) /mmBtu of actual heat input [See b)(2)d.]
b.	OAC rule 3745-18-87(C)	6.7 lb sulfur dioxide (SO ₂) /mmBtu of actual heat input
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-31-05(A)(3) (PTI 03-8645 as modified September 20, 1995)	See b)(2)a.
e.	OAC rule 3745-21-08(B)	See b)(2)b.
f.	40 CFR 63.52(a)(2)	See b)(2)c.
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(5) through d)(11), and e)(5) and e)(6).

(2) Additional Terms and Conditions

a. The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-10(C)(2), 3745-18-87(C), and 3745-21-08(B).

b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

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



and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- c. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

- d. Pursuant to OAC rule 3745-17-10, the total heat input for this emissions unit was de-rated from 85 mmBtu/hr to 69.4 mmBtu/hr. (The de-rated total heat input of 69.4 mmBtu/hr corresponds to a steam load of 54,600 pounds per hour.) Using the de-rated total heat input, the allowable PE rate for this emissions unit, from Figure I (curve P-2) of OAC rule 3745-17-10, is 0.33 pound per mmBtu actual heat input.
[OAC rule 3745-17-10(B)(3)]

c) Operational Restrictions

- (1) The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" basis: a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 6.7 pounds sulfur dioxide /mmBtu actual heat input. Compliance with the above-mentioned specifications shall be determined by using:

- a. analytical results provided by the permittee or coal supplier for each shipment of coal, or
- b. analytical results for the composite sample of coal collected during each calendar month.

[OAC 3745-77-07(A)(1), PTI 03-8645, and OAC rule 3745-18-04(D)]

- (2) In addition to coal, the permittee may combust waste/used lubricating oil, waste/used soybean oil, and soybean oil sludge (that have been generated on-site) in this emissions unit. These fuels, if fired, shall be applied to the coal while it is being transferred into the storage silos. No such materials shall be applied to coal which is to be dumped on an outside storage pile.

[OAC 3745-77-07(A)(1) and PTI 03-8645]

- (3) The waste/used lubricating oil shall meet the following specifications:

<u>contaminant/property:</u>	<u>permit allowable concentration:</u>
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum



total halogens	1000 ppm, maximum
mercury	1 ppm, maximum
flash point	100 degrees Fahrenheit, minimum
heat content	100,000 Btu/gallon, minimum
[OAC 3745-77-07(A)(1) and PTI 03-8645]	

- (4) The maximum annual supplemental fuel usage for this emissions unit shall not exceed the following:
 - a. 200 gallons of waste/used lubricating oil; and
 - b. 3,000 gallons of waste/used soybean oil and soybean oil sludge, combined.
- (5) At no time shall the steam flow rate from this emissions unit exceed 54,624 pounds per hour (as an average over any one-hour period).
[OAC 3745-77-07(A)(1), PTI 03-8645, and OAC rule 3745-17-10(B)(3)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall either:
 - a. collect a representative sample of each shipment of coal which is received for burning. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample. Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal); or
 - b. collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. Each sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal).

The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal.

The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.
[OAC 3745-77-07(C)(1), PTI 03-8645, and OAC rule 3745-18-04(D)(3)(c)]

- (2) The permittee shall either:
 - a. for each shipment of coal received for burning in this emissions unit, maintain records of the total quantity of coal received and the permittee's or coal supplier's



analyses for ash content, sulfur content, and heat content, and calculations according to f)(4); or

- b. maintain monthly records of the total quantity of coal received, and the results of the analyses of the composite sample for ash content, sulfur content, and heat content, and calculations according to f)(4).

[OAC 3745-77-07(C)(1), PTI 03-8645, and OAC rule 3745-18-04(D)]

- (3) The permittee shall maintain monthly records to demonstrate that the allowable supplemental fuel usage rates in c)(4) were not exceeded. At a minimum, the records shall document the type and amount (in gallons) of waste product applied to the coal, and the dates applied. In addition to these records, the permittee shall maintain, on site, a chemical analysis of the waste lubricating oil (based on a single composite sample taken annually) to show that the specifications contained in c)(3) are met.
[OAC 3745-77-07(C)(1) and PTI 03-8645]

- (4) The permittee shall continuously monitor and record the steam flow rate from this emissions unit. Copies of all steam flow rate charts shall be maintained for a period of 5 calendar years, and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request.
[OAC 3745-77-07(C)(1), PTI 03-8645, and OAC rule 3745-17-10(B)(3)]

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

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

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

The acceptable range for the pressure drop across the baghouse is 0.25 to 8.0 inches of water.



This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

- (6) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

- (7) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:

- a. checking the bags / filters for deterioration or degradation;
- b. checking the cleaning system for proper operation; and
- c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

- (8) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

- (9) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.



[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

- (10) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.

[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

- (11) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning, or for each monthly composite sample, in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

- a. the total quantity of coal received in each shipment (tons), or quantity per month in the case of monthly composite samples; and
- b. the calculated SO₂ emission rate (pounds SO₂ /mmBtu actual heat input) from each shipment of coal received, or for each month in the case of monthly composite samples. [See f)(4)]

These quarterly reports shall be submitted by February 15, May 15, August 15 and November 15 of each year, unless otherwise specified by the appropriate Ohio EPA District Office or local air agency, and shall cover the coal shipments received during the



previous calendar quarters. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1), PTI 03-8645, and OAC rule 3745-18-04(D)]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any exceedance of the oil specifications in c)(3). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-8645]
- (3) The permittee shall submit annual reports that summarize the actual annual gallon usages of waste lubricating oil, and waste soybean oil and soybean oil sludge, for this emissions unit. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-8645]
- (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the de-rated steam load specified above (in pounds per hour, as an average over any one-hour period). The following information shall be included in the reports:
 - a. the date of the exceedance;
 - b. the time interval over which the exceedance occurred;
 - c. the value of the exceedance;
 - d. the cause(s) of the exceedance;
 - e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and
 - f. a copy of the steam chart which shows the exceedance.

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

[OAC 3745-77-07(C)(1), PTI 03-8645, and OAC rule 3745-17-10(B)(3)]

- (5) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);



- b. an identification of each incident of deviation described in (a) above 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(s), 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.

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

[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

- (6) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1), PTI 03-8645, and 40 CFR, Part 64]

f) **Testing Requirements**

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s) for PE: 40 CFR, Part 60, Appendix A, Methods 1 - 5
 - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]



- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.33 lb particulate emissions (PE) /mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing. [See f)(1).]

(Past compliance with the hourly PE limitations was demonstrated by emission testing conducted on March 20, 2007.)

[OAC 3745-77-07(C)(1) and PTI 03-8645]

- b. Emission Limitation:
6.7 pounds SO₂ /mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated in accordance with the recordkeeping and calculations specified in d)(1) and d)(2) as applicable.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

[OAC 3745-77-07(C)(1) and PTI 03-8645]



- c. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
[OAC 3745-77-07(C)(1) and PTI 03-8645]

- (4) Sulfur dioxide emissions from solid fuel samples shall be calculated as follows:

$$ER = (1 \times 10^6) / H \times S \times 1.9$$

where:

ER = the emission rate in pounds of sulfur dioxide per MM Btu;

H = the heat content of the solid fuel in Btu per pound; and

S = the decimal fraction of sulfur in the solid fuel.

[OAC 3745-77-07(C)(1), PTI 03-8645, and OAC rule 3745-18-04(F)(1)]

- g) Miscellaneous Requirements

- (1) None.



2. P002, Flakers

Operations, Property and/or Equipment Description:

Soybean Flaker - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-7272 as modified July 26, 1995)	0.48 lb particulate emissions (PE) /hr, 2.10 ton PE /yr See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)b.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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



operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]
- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic



monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:

- a. checking the bags / filters for deterioration or degradation;
- b. checking the cleaning system for proper operation; and
- c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]
- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]
- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in (a) above 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(s), 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.



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

[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:
0.48 lb PE /hr, 2.10 ton PE /yr

Applicable Compliance Method:

Compliance with the lb/hr limitation may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (6300 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

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

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC 3745-77-07(C)(1) and PTI 03-7272]

b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1) and PTI 03-7272]

g) Miscellaneous Requirements

(1) None.



3. P006, Hull Refining

Operations, Property and/or Equipment Description:

Soybean Hull Refining - Shakers and Aspirators - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	33.0 lbs particulate emissions (PE) /hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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



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

The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:

- a. checking the bags / filters for deterioration or degradation;
- b. checking the cleaning system for proper operation; and
- c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection



program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]
- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]
- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.
[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in (a) above 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(s), 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.

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

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:
33.0 lb PE /hr

Applicable Compliance Method:

Compliance with the lb/hr limitation may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (13,500 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).
[OAC 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



4. P019, Millfeed Grinding Conveying & Storage

Operations, Property and/or Equipment Description:

Soybean Millfeed - Grinding, Conveying, and Storage - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-7272 as modified July 26, 1995)	0.384 lb particulate emissions (PE) /hr, 1.68 ton PE /yr See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)b.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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



operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]
- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic



monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:

- a. checking the bags / filters for deterioration or degradation;
- b. checking the cleaning system for proper operation; and
- c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]
- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]
- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.
[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in (a) above 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(s), 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.



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

[OAC 3745-77-07(C)(1), PTI 03-7272, and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:
0.384 lbs PE /hr

Applicable Compliance Method:

The permittee shall determine compliance with the above emission limitation by multiplying the maximum process weight rate (tons/hr) by an emission factor of 0.34 lb of PE/ton (AP-42 Table 9.11.1-1 -cyclone [11/95]) and then multiplying by an additional control factor of (1 - 0.95).*

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

* The control efficiency of the baghouse is assumed to be 95%.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



5. P031, Soybean Oil Extraction and Recovery System

Operations, Property and/or Equipment Description:

Soybean Oil Extraction - Soybean flakes pass through an extractor, removing oil, then pass through the DTDC sections where solvent is removed with steam, flakes are toasted, dried and cooled. The mineral oil absorber recovers most of the solvent making it past the condenser.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13592 issued September 6, 2001)	99.2 lb volatile organic compounds (VOC - hexane) /hr (point and fugitive) 357 tons of VOC (hexane) per rolling 12-month period [See c)(1).] 0.20 gal of VOC (hexane) 'loss' per ton of soybean processed (rolling 12-month average) 8.5 lbs particulate emissions (PE) /hr, 37.2 tons PE /yr See b)(2)i.
b.	40 CFR, Part 63, Subpart GGGG (40 CFR 63.2830 - 63.2872)	See 40 CFR 63.2840 [Table 1 (ix)] Solvent Loss Factor (SLF) - 0.2 gallon Hazardous Air Pollutant (HAP) /ton oilseed See b)(2)a.
c.	40 CFR 63.1-15 (40 CFR 63.2870)	Table 1 to Subpart GGGG of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGG shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)(2)	See b)(2)j.
f.	OAC rule 3745-21-07(G)(2)	See b)(2)k and c)(2).
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

a. In accordance with US EPA Consent Decree, Section IV-C, Paragraph 32, the permittee has committed to a SLR for this emissions unit at this facility of 0.20 gallons VOC per ton which, together with modifications to malfunction provisions and absence of startup and shutdown exclusions, results in a more stringent emissions standard than the HAP emissions standard based on 0.2 gallons HAP per ton SLF from 40 CFR 63 Subpart GGGG. Sections b)(2)b through b)(2)i specify requirements from Subpart GGGG as modified by the Consent Decree.

b. HAP loss requirements:

i. The emission requirements limit the number of gallons of VOC lost per ton of oilseed (soybean) processed. For each operating month, the permittee must calculate a compliance ratio which compares the actual VOC loss to the allowable VOC loss for the previous 12 operating months as shown in Equation 1 of this section. An operating month, as defined in 40 CFR 63.2872 and modified by the Consent Decree, is any calendar month in which a source processes oilseed, excluding a malfunction period as set forth in Consent Decree, Section IV-D, Paragraph 38. Equation 1 of this section follows:

$$\text{Compliance Ratio} = \text{Actual VOC Loss} / \text{Allowable VOC Loss}$$

ii. Equation 1 of this section can also be expressed as a function of total solvent loss as shown in Equation 2 of this section. Equation 2 of this section follows:

$$\text{Compliance Ratio} = (\text{Actual Solvent Loss}) / (\text{Oilseed} \times \text{SLF})$$

Where:

Actual Solvent Loss = Gallons of actual solvent loss during previous 12 operating months, as determined in b)(2)a.i.

Oilseed (soybean) = Tons of oilseed processed during the previous 12 operating months, as shown in 40 CFR 63.2855.

SLF = The corresponding solvent loss factor of 0.20 gal/ton.
[40 CFR 63.2840(a)]

c. When the source has processed listed oilseed for 12 operating months, calculate the compliance ratio by the end of each calendar month following an operating



month using Equation 2 of this section. When calculating your compliance ratio, consider the following conditions and exclusions:

- i. If the source processes any quantity of oilseed in a calendar month and the source is not operating under an allowed malfunction period, then the permittee must categorize the month as an operating month as defined in this permit.
- ii. The 12-month compliance ratio may include operating months occurring prior to a source shutdown and operating months that follow after the source resumes operation.
- iii. If the source shuts down and processes no listed oilseed for an entire calendar month, then the permittee must categorize the month as a non-operating month. Exclude any non-operating months from the compliance ratio determination.
- iv. If the source is subject to a malfunction period as defined in this permit, exclude from the compliance ratio determination any solvent and oilseed information recorded for the malfunction period as provided in Consent Decree, Section VII-F, Paragraph 75.
[40 CFR 63.2840(b)]
- d. If the compliance ratio is less than or equal to 1.00, the source was in compliance with the VOC emission requirements for the previous operating month.
[40 CFR 63.2840(c)]
- e. The permittee shall:
 - i. Maintain all the necessary records you have used to demonstrate compliance with Subpart GGGG in accordance with 40 CFR 63.2862, except that monitoring and recordkeeping of solvent losses at each plant shall be conducted daily in accordance with Consent Decree, Section IV-D, Paragraph 37.
 - ii. Submit the reports as specified in 40 CFR 63.2850(a)(5).
 - iii. Submit all notifications and reports and maintain all records required by the MACT General Provisions for performance testing if you add a control device that destroys solvent.
[40 CFR 63.2850(a)(4), (5), and (6)]
- f. Existing sources under normal operation: The permittee must meet all of the requirements listed in Table 1 of 40 CFR 63.2850 for sources under normal operation.
[40 CFR 63.2850(b)]
- g. Unless otherwise prohibited in the Consent Decree, for existing or new sources that have been significantly modified: An existing or new source that has been significantly modified must meet the requirements associated with one of two compliance options. Within 15 days of the modified source startup date, you must choose to comply with one of the options listed in g.i or g.ii as follows:



- i. Normal operation. Upon startup of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources under normal operation, and the schedules for demonstrating compliance for an existing or new source that has been significantly modified in Table 2 of that section.
 - ii. Initial startup period. For up to 3 calendar months after the startup date of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating under an initial startup period, and the schedules for demonstrating compliance for a significantly modified existing or new source operating under an initial startup period in Table 2 of that section. After a maximum of 3 calendar months, a new or existing source must meet all of the requirements listed in Table 1 of that section for sources under normal operation.
[40 CFR 63.2850(d)]
- h. Existing or new sources experiencing a malfunction: A malfunction is described for this permit in b)(2)b.i. In general, it means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or process equipment to function in a usual manner. If an existing or new source experiences an unscheduled shutdown as a result of a malfunction, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, then the permittee must meet the requirements associated with one of two compliance options. Routine or scheduled process startups and shutdowns resulting from, but not limited to, market demands, maintenance activities, and switching types of oilseed processed, are not startups or shutdowns resulting from a malfunction and, therefore, do not qualify for this provision. Within 15 days of the beginning date of the malfunction, the permittee must choose to comply with one of the options listed in h.i or h.ii as follows:
 - i. Normal operation. The source must meet all of the requirements listed in 40 CFR 63.2850(a) and one of the options listed in 40 CFR 63.2850(e)(1)(i) through (iii).
 - ii. Malfunction period. Throughout the malfunction period, you must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating during a malfunction period. At the end of the malfunction period, the source must then meet all of the requirements listed in Table 1 of that section for sources under normal operation.
[40 CFR 63.2850(e)]
- i. The permittee must develop a written SSM plan in accordance with 40 CFR 63.6(e)(3). The permittee must complete the SSM plan before the compliance date for the source. The permittee must also keep the SSM plan on-site and readily available as long as the source is operational. The SSM plan provides detailed procedures for operating and maintaining your source to minimize emissions during a qualifying SSM event for which the source chooses the 40 CFR 63.2850(e)(2) malfunction period, or the 40 CFR 63.2850(d)(2) initial startup



period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. Some or all of the procedures may come from plans developed for other purposes such as a Standard Operating Procedure manual or an Occupational Safety and Health Administration Process Safety Management plan. To qualify as a SSM plan, other such plans must meet all the applicable requirements of these NESHAP. [40 CFR 63.2852]

- j. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- k. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.
- l. The hourly VOC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) **Operational Restrictions**

- (1) The maximum annual crushed soybean processed by this emissions unit shall not exceed 647,875 tons, based upon a rolling, 12-month summation of the monthly amounts.
[OAC 3745-77-07(A)(1) and PTI 03-13592]
- (2) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
[OAC 3745-77-07(A)(1) and PTI 03-13592]

d) **Monitoring and/or Recordkeeping Requirements**

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

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



investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

The acceptable range for the pressure drop across the cyclone(s) is 0.25 to 8.0 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-13592, and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the cyclone controlling this emissions unit is the static pressure drop across the cyclone, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The cyclone shall not be configured to have bypass capability.
[OAC 3745-77-07(C)(1), PTI 03-13592, and 40 CFR, Part 64]
- (3) Cyclone operating parameters shall be re-verified as a result of any changes to the operating conditions of the cyclone or emissions unit. In addition to periodic monitoring of the cyclone operating parameters, the permittee shall perform an inspection of the cyclone on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit to check for any corrosion / erosion / damage resulting in air-leakage, solids build-up / air flow blockage, etc. The cyclone duct work shall be inspected for holes, rust, etc and the cyclone dampers shall be visual inspected. Repair and replacement of equipment shall be performed as determined by the inspection. The



permittee shall also perform daily inspections of the pressure taps on the differential pressure gauge to check for plugging in accordance with the inspection and maintenance checklist.

[OAC 3745-77-07(C)(1), PTI 03-13592, and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1), PTI 03-13592, and 40 CFR, Part 64]

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1), PTI 03-13592, and 40 CFR, Part 64]

- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the cyclone system in accordance with any manufacturer recommendations.

[OAC 3745-77-07(C)(1), PTI 03-13592, and 40 CFR, Part 64]

- (7) The permittee shall collect and record the following information each month for this emission unit:

- a. the total quantity of soybeans weighed in the preparation process before the hexane extraction operation;
- b. the total amount of hexane inventory lost in gallons/month;
- c. the 12-month rolling weighted average hexane loss rate (gallons per ton of crushed soybeans, and pounds hexane per pound crushed soybeans);
- d. the amount of hexane emitted in tons/month; and
- e. the amount of hexane emitted in tons/rolling 12-month.

(Note: It is recognized that data, records, and calculations used for compliance with MACT Subpart GGGG standards may also serve as data, records, and calculations for this section where applicable.)

[OAC 3745-77-07(C)(1) and PTI 03-13592]

- (8) The permittee shall maintain records showing the organic compound materials used to be non-photochemically reactive. These records shall be maintained in accordance with the record-keeping requirements specified in the Standard Terms and Conditions of this permit.

[OAC 3745-77-07(C)(1) and PTI 03-13592]



- (9) Except as provided by the Consent Decree, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2862(b) - compliance plan and SSM plan retention on-site

63.2862(c) - records for hexane mass balance calculations

63.346(d) - records for calculation of rolling 12-month averages and the 'compliance ratio'

63.2862(e) - records for startup, shutdown, and malfunction events

63.2863 - records retention

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart GGGG]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the pressure drop across the cyclone(s) 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.

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

[OAC 3745-77-07(C)(1), PTI 03-13592, and 40 CFR, Part 64]

- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

- a. any exceedance of the rolling, 12-month crushed soybean restriction of 647,875 tons; and
- b. any exceedance of the 0.20 gal of VOC (hexane) 'loss' per ton;



- c. any exceedance of the 357 tons of VOC (hexane) per rolling 12-month period; and
- d. any incidence of use of a photochemically reactive material.

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

[OAC 3745-77-07(C)(1) and PTI 03-13592]

- (3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-13592]

- (4) Except as provided by the Consent Decree, the permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2860(c) - significant modification notifications, as applicable

63.2861(a) - annual compliance certification

63.2861(b) - deviation notification report

63.2861(c) - periodic startup, shutdown, and malfunction report

63.2861(d) - immediate startup, shutdown, and malfunction report

The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart GGGG]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and visible emissions for PE.



- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate and visible emissions:

PE: Methods 1 through 5 of 40 CFR, Part 60, Appendix A

Visible PE: Method 9, 40 CFR, Part 60, Appendix A

- d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (2) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
99.2 lb VOC (hexane) /hr

Applicable Compliance Method:

Compliance with the emission limitation may be demonstrated by multiplying the maximum daily capacity of this emissions unit (2160 tons of crushed soybeans/day) by 0.20 gallon hexane/ton of crushed soybeans and by the density of hexane (5.51 pounds VOC/gallon), and then dividing by 24.

[OAC 3745-77-07(C)(1) and PTI 03-13592]

- b. Emission Limitation:
357 tons of VOC (hexane) per rolling 12-month period

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(7)e.



[OAC 3745-77-07(C)(1) and PTI 03-13592]

- c. Emission Limitation:
0.20 gal of VOC (hexane) 'loss' per ton of soybean processed
[rolling 12-month average]

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in d)(7)c.
[OAC 3745-77-07(C)(1) and PTI 03-13592]

- d. Emission Limitation:
hexane loss restrictions [See b)(2)a.]

Applicable Compliance Method:
Compliance shall be based on the requirements specified in b)(2)a through b)(2)c.
[OAC 3745-77-07(C)(1) and PTI 03-13592]

- e. Emission Limitation:
8.5 lb PE /hr, 37.2 ton/yr

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing. [See f)(1).]

Past compliance with the hourly PE limitation was demonstrated by emission testing (April 2002).

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-13045]

- f. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1). [See f)(1).]
[OAC 3745-77-07(C)(1) and PTI 03-13045]

g) Miscellaneous Requirements

- (1) None.



6. P034, Grain Dryer

Operations, Property and/or Equipment Description:

Grain Dryer - (non-conventional) fluidized bed - with closed-loop cyclone

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-4292 as modified March 9, 1995)	3.12 lbs particulate matter (filterable) less than 10 microns (PM ₁₀) /hr, 13.7 tons PM ₁₀ /yr Visible PE shall not exceed 0% opacity, as a six-minute average. 4.89 lbs nitrogen oxides (NO _x)/hr, 21.4 tons NO _x /yr
b.	OAC rule 3745-17-07(B)(1)	none [See b)(2)a.]
c.	OAC rule 3745-17-08(B)(1)	none [See b)(2)b.]
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)(2)	See b)(2)c.
f.	40 CFR, Part 60, Subpart DD	none [See b)(2)d.]

(2) Additional Terms and Conditions

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

b. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

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

d. This emissions unit has permanent grain storage capacity less than 1,000,000 bushels, and therefore is not a "grain storage elevator" subject to NSPS Subpart DD.



c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from 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 cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

[OAC 3745-77-07(C)(1) and PTI 03-4292]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1) and PTI 03-4292]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
3.12 lbs filterable PM₁₀ /hr, 13.7 tons PM₁₀ /yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the manufacturer's pilot-scale-tested outlet concentration (0.0021 grain/standard cubic foot) by the maximum air flow rate (36,000 scfm), and then multiplying by 60 and dividing by 7000.

Because there is no formal stack serving this unit, if testing is required, the company shall determine an appropriate method to be employed to demonstrate compliance with the hourly allowable PE limitation. Ohio EPA will need to approve the method prior to any such testing.

The annual allowable PM₁₀ limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.



[OAC 3745-77-07(C)(1) and PTI 03-4292]

- b. Emission Limitations:
4.89 lbs NO_x /hr, 21.4 tons NO_x/yr

Applicable Compliance Method:

Compliance with the hourly allowable NO_x emission limitation may be determined by multiplying the natural gas emission factor of 100 pounds NO_x/mm cu. ft (AP-42, Table 1.4-1 (revised 3/98) by the maximum natural gas combustion rate (mm cu. ft/hr).

Because there is no formal stack serving this unit, if testing is required, the company shall determine an appropriate method to be employed to demonstrate compliance with the hourly allowable NO_x limitation. Ohio EPA will need to approve the method prior to any such testing.

The annual allowable NO_x limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-4292]

- c. Emission Limitation:
Visible fugitive PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC 3745-77-07(C)(1) and PTI 03-4292]

- g) Miscellaneous Requirements

- (1) None.



7. P903, Truck Receiving

Operations, Property and/or Equipment Description:

Soybean - Truck Receiving

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-02(A)(2) (PTI 03-17219 issued January 23, 2007)	See b)(2)a and b)(2)b. 0.005 gr particulate matter (filterable) less than 10 microns (PM ₁₀) /dscf from baghouse stack 4.60 tons PM ₁₀ /yr (baghouse stack) 2.31 tons particulate emissions (PE)/yr (fugitive)
b.	40 CFR, Part 60, Subpart DD	Visible stack PE shall not exceed 0% opacity, as a 6-minute average Visible fugitive PE shall not exceed 5% opacity, as a 6-minute average See b)(2)e and b)(2)f.
c.	OAC rule 3745-17-08(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)d.
f.	OAC rule 3745-17-07(B)	See b)(2)g.
g.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

a. The permittee has requested voluntary allowable emission limitations of 0.005 grains PM₁₀/dscf, 4.60 tons PM₁₀/yr (stack), and 2.31 tons PE/yr (fugitive). The short-term (gr/dscf) and long-term (tons/year) emission limitations for PM₁₀ and PE are being established as practically and legally enforceable requirements



representing the potential to emit based on the use of a two sided enclosure with aspiration to a baghouse meeting a maximum outlet concentration of 0.005 gr PM₁₀/dscf.

- b. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart DD.
- c. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).
- e. These opacity requirements apply to grain handling operations as they are defined in 40 CFR Part 60 Subpart DD.
- f. The gr /dscf emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).
- g. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who



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

The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-17219, and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.
[OAC 3745-77-07(C)(1), PTI 03-17219, and 40 CFR, Part 64]
- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1), PTI 03-17219, and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[OAC 3745-77-07(C)(1), PTI 03-17219, and 40 CFR, Part 64]



- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[OAC 3745-77-07(C)(1), PTI 03-17219, and 40 CFR, Part 64]
 - (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.
[OAC 3745-77-07(C)(1), PTI 03-17219, and 40 CFR, Part 64]
 - (7) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from grain handling operations [see b)(2)d] 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 eliminate the abnormal visible emissions.
[OAC 3745-77-07(C)(1), PTI 03-17219]
- e) Reporting Requirements
- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in (a) above 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(s), 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.



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

[OAC 3745-77-07(C)(1), PTI 03-17219, and 40 CFR, Part 64]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from grain handling operations associated with this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1) and PTI 03-17219]

f) Testing Requirements

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

- a. The emission testing shall be conducted within 6 months prior to expiration of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission concentration for PM₁₀.

- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for PM₁₀: Method 201 or 201A of 40 CFR 51, Appendix M

- d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information



necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.005 gr PM₁₀/dscf (stack)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PM₁₀ limitation based on the results of emission testing. [See f)(1).]

(Past compliance with the PM₁₀ limitation was demonstrated by emission testing in February 2008).

[OAC 3745-77-07(C)(1) and PTI 03-17219]

- b. Emission Limitation:
4.60 tons PM₁₀/yr (stack)

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the emission limitation of 0.005 gr PM₁₀/dscf by the maximum volumetric flow rate (24,500 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.005 gr PM₁₀/dscf, compliance shall also be shown with the annual limitation.

[OAC 3745-77-07(C)(1) and PTI 03-17219]

- c. Emission Limitation:
2.31 tons PE/yr (fugitive)

Applicable Compliance Method:

The permittee shall demonstrate compliance by multiplying AP-42 emission factors of 0.035 lb PE/ton grain (hopper truck) and 0.18 lb PE/ton grain (straight truck) [Section 9.9.1 (3/03)] by a maximum annual grain throughput of 647,875 tons grain/yr*, by a conversion factor of ton/2000 lbs, and applying a 90% capture efficiency for use of a two sided enclosure with aspiration to a baghouse.

* This Title V permit has an established restriction on grain throughput of 647,875 tons per year [See c)(1) on emissions unit P031]. Worst case emissions are based on 75% of the throughput from hopper truck receiving and 25% from straight truck receiving.



[OAC 3745-77-07(C)(1) and PTI 03-17219]

d. Emission Limitation:

Visible stack PE shall not exceed 0% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance with the fugitive opacity standard was demonstrated by emissions testing conducted on February 26, 2008.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC 3745-77-07(C)(1) and PTI 03-17219]

e. Emission Limitation

Visible fugitive PE shall not exceed 5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance with the fugitive opacity standard was demonstrated by emissions testing conducted on February 26, 2008.

If required, the permittee shall further demonstrate compliance with the visible emission limitation listed above in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as specified in 40 CFR 60.303(b)(3).

[OAC 3745-77-07(C)(1) and PTI 03-17219]

g) Miscellaneous Requirements

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



8. Emissions Unit Group - Cracking/Dehulling (group)

EU ID	Operations, Property and/or Equipment Description
P001	Soybean Crackers - with baghouse
P004	Soybean Flakers - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(2)	75 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-31-05(A)(3) (PTI 03-4292 as modified March 9, 1995)	4.2 lb particulate matter (filterable) less than 10 microns (PM ₁₀) /hr, 18.4 ton PM ₁₀ /yr [for emissions unit P001] See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

a. The PE limitation of 75 lbs/hr represents an allowable PE rate for emissions units P001 and P004 combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P001 and P004 combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Van Wert County.]

b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B) [for emissions unit P001].

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

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

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

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

The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment



shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.
 [OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]

- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.
 [OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 [OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]
- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 [OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]
- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.
 [OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in (a) above 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(s), 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.

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

[OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
75 lb PE /hr

Applicable Compliance Method:

Compliance with the lb/hr limitation(s) may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (25,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with OAC rule 3745-17-03(B)(10).

[OAC 3745-77-07(C)(1) and PTI 03-4292]

- b. Emission Limitation:
4.2 lb (filterable) PM₁₀ /hr, 18.4 ton PM₁₀ /yr (for emissions unit P001)

Applicable Compliance Method:

Compliance with the lb/hr limitation(s) may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (25,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour. (All PE is assumed to be PM₁₀.)

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Method 201 or 201A of 40 CFR 51, Appendix M.

The annual allowable PM₁₀ limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC 3745-77-07(C)(1) and PTI 03-4292]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087745

Facility ID: 0381000011

Effective Date: To be entered upon final issuance

- c. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1) and PTI 03-4292]

- g) Miscellaneous Requirements

- (1) None.



9. Emissions Unit Group - Soybean Meal System (group)

EU ID	Operations, Property and/or Equipment Description
P009	Soybean Meal Grinding - with baghouse
P038	Soybean Meal Sizing and Classification - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(2)	75 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-31-05(A)(3) (PTI 03-4978 issued March 14, 1990)	1.44 lb particulate emissions (PE) /hr, 6.3 ton PE /yr [for emissions unit P038] See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

a. The PE limitation of 75 lbs/hr represents an allowable PE rate for emissions units P009 and P038 combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P009 and P038 combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Van Wert County.]

b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B) [for emissions unit P038].

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

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

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

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

The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-4978, and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment



shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.
 [OAC 3745-77-07(C)(1), PTI 03-4978, and 40 CFR, Part 64]

- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.
 [OAC 3745-77-07(C)(1), PTI 03-4978, and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 [OAC 3745-77-07(C)(1), PTI 03-4978, and 40 CFR, Part 64]
- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 [OAC 3745-77-07(C)(1), PTI 03-4978, and 40 CFR, Part 64]
- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.
 [OAC 3745-77-07(C)(1), PTI 03-4292, and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in (a) above 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(s), 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.

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

[OAC 3745-77-07(C)(1), PTI 03-4978, and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
75 lb PE /hr

Applicable Compliance Method:

Compliance with the lb/hr limitation may be determined by adding 'i' and 'ii' below:

- i. multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (16,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.
- ii. multiplying the maximum bin vent filter outlet concentration of 1 gr/dscf by the baghouse's maximum volumetric air flow rate (620 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with OAC rule 3745-17-03(B)(10)
[OAC 3745-77-07(C)(1) and PTI 03-4978]

- b. Emission Limitation:
for P038: 1.44 lb PE /hr, 6.3 ton PE /yr

Applicable Compliance Method:

Compliance with the lb/hr limitation(s) may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (16,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1 - 5



The annual allowable PE limitation for P038 was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation. [OAC 3745-77-07(C)(1) and PTI 03-4978]

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1) and PTI 03-4978]

g) Miscellaneous Requirements

(1) None.



10. Emissions Unit Group: Rail Receiving/Pod Cleaning/Grinding/Storage

EU ID	Operations, Property and/or Equipment Description
P017	Soybean Rail Receiving, Loading to Storage Elevator - with baghouse
P035	Soybean Cleaning System - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(2)	61.8 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-31-05(A)(3) (PTI 03-6461 as modified February 9, 1995)	0.83 lb particulate emissions (PE) /hr, 3.63 ton PE /yr [for emissions unit P035] Visible PE shall not exceed 0% opacity as a six-minute average from the baghouse stack. See b)(2)b and b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)c and b)(2)d.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).

(2) Additional Terms and Conditions

- a. The PE limitation of 75 lbs/hr represents an allowable PE rate for emissions units P009 and P038 combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P009 and P038 combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Van Wert County.]
- b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-11(B) [for emissions unit P035].
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) [for emissions unit P035].



- d. These two emissions units share the same particulate control device and emissions point. Therefore, the (more stringent) visible PE emissions restriction of PTI 03-6461 applies not only to emissions unit P035 but also to emissions unit P017.
- c) Operational Restrictions
 - (1) None.
 - d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-6461, and 40 CFR, Part 64]



(2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.
[OAC 3745-77-07(C)(1), PTI 03-6461, and 40 CFR, Part 64]

(3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:

- a. checking the bags / filters for deterioration or degradation;
- b. checking the cleaning system for proper operation; and
- c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1), PTI 03-6461, and 40 CFR, Part 64]

(4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[OAC 3745-77-07(C)(1), PTI 03-6461, and 40 CFR, Part 64]

(5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[OAC 3745-77-07(C)(1), PTI 03-6461, and 40 CFR, Part 64]

(6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.
[OAC 3745-77-07(C)(1), PTI 03-6461, and 40 CFR, Part 64]



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in (a) above 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(s), 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.

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

[OAC 3745-77-07(C)(1), PTI 03-6461, and 40 CFR, Part 64]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
61.8 lb PE /hr

Applicable Compliance Method:
Compliance with the lb/hr limitation(s) may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (4000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with OAC rule 3745-17-03(B)(10).
[OAC 3745-77-07(C)(1) and PTI 03-6461]
 - b. Emission Limitation:
0.83 lb PE /hr, 3.63 ton PE /yr (for emissions unit P035)

Applicable Compliance Method:
Compliance with the lb/hr limitation(s) may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's



maximum volumetric air flow rate (4000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

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

The annual allowable PE limitation for P035 was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation. [OAC 3745-77-07(C)(1) and PTI 03-6461]

- c. Emission Limitation:
Visible PE shall not exceed 0% opacity as a six-minute average from the baghouse stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9. [OAC 3745-77-07(C)(1) and PTI 03-6461]

- g) Miscellaneous Requirements

- (1) None.



11. Emissions Unit Group - Meal Load-out (group)

EU ID	Operations, Property and/or Equipment Description
P901	Truck Meal Load-out (with baghouse)
P902	Rail Meal Load-out (with baghouse)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-17016 issued November 8, 2005)	3.6 tons/yr fugitive particulate emissions (PE) [from emissions unit P901 and P902 combined] Visible fugitive PE shall not exceed 20% opacity, as a three-minute average 3.8 tons of particulate matter less than 10 microns (PM ₁₀) /yr [from P901 baghouse stack] 5.6 tons of particulate matter less than 10 microns (PM ₁₀) /yr [from P902 baghouse stack] 0.005 gr PM10/dry standard cubic foot (dscf) [from each baghouse stack] Visible PE shall not exceed 0% opacity, as a six-minute average from each baghouse stack See b)(2)a.
b.	OAC rule 3745-17-07(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)d.
f.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6), and e)(1).



(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the use of a three-sided enclosure, aspirated to a baghouse. The baghouse shall achieve a maximum outlet concentration of 0.005 gr PM₁₀/dscf.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. All the PE from the baghouse stack are PM10.

c) Operational Restrictions

- (1) The maximum annual meal throughput for emissions units P901 and P902, combined, shall not exceed 531,258 tons.

d) Monitoring and/or Recordkeeping Requirements

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

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

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



The acceptable range for the pressure drop across the baghouse is 0.25 to 10 inches of water.

This range(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 range(s) 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(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.
[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]
- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]
- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include,



but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]

- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.

[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]

- (7) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit. The presence or absence of any visible fugitive 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.

[OAC 3745-77-07(C)(1), PTI 03-17016]

- (8) The permittee shall calculate and maintain monthly records of the following information for emissions units P901 and P902, combined:

- a. the amount of meal throughput, in tons; and
- b. the amount of meal throughput, in tons, to date, for the calendar year.

[OAC 3745-77-07(C)(1) and PTI 03-17016]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:



- a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
- b. an identification of each incident of deviation described in (a) above 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(s), 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.

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

[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1), PTI 03-17016, and 40 CFR, Part 64]
- (3) The permittee shall submit annual reports that summarize the actual annual meal throughput, in tons, for emissions units P901 and P902, combined. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-17016]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission concentration for PM₁₀.



- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for PM₁₀: Method 201 or 201A of 40 CFR 51, Appendix M
- d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
3.6 tons/yr fugitive particulate emissions (PE)
[from emissions unit P901 and P902 combined]

Applicable Compliance Method:

The annual emission limitation was developed by applying a 95% capture efficiency to fugitive emissions generated from the loading operation. The fugitive emissions from the loading operation were calculated by multiplying a maximum meal throughput of 531,258 tons/year, an emission factor of 0.27 lb of PE/ton of meal (AP-42 Section 9.11.1, Vegetable Oil Processing [revised 11/95]), and a conversion factor of ton/2000 lbs. Therefore, provided compliance is shown with the maximum annual meal throughput, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI 03-17016]

- b. Emission Limitation:
0.005 gr PM₁₀/dscf (stack)



Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PM₁₀ limitation based on the results of emission testing. [See f)(1).]

(Past compliance with the PM₁₀ limitation was demonstrated by emission testing in October 2006).

[OAC 3745-77-07(C)(1) and PTI 03-17016]

c. **Emission Limitation:**

3.8 tons of PM₁₀/year (P901 stack)

Applicable Compliance Method:

The ton per year emission limitation was developed by multiplying the emission limitation of 0.005 gr PM₁₀/dscf by the maximum volumetric flow rate (20,000 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.005 gr PM₁₀ /dscf, compliance shall also be shown with the annual limitation.

[OAC 3745-77-07(C)(1) and PTI 03-17016]

d. **Emission Limitation:**

5.6 tons of PM₁₀/year (P902 stack)

Applicable Compliance Method:

The ton per year emission limitation was developed by multiplying the emission limitation of 0.005 gr PM₁₀/dscf by the maximum volumetric flow rate (30,000 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.005 gr PM₁₀ /dscf, compliance shall also be shown with the annual limitation.

[OAC 3745-77-07(C)(1) and PTI 03-17016]

e. **Emission Limitation:**

Visible fugitive PE shall not exceed 20% opacity, as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

[OAC 3745-77-07(C)(1) and PTI 03-17016]

f. **Emission Limitation:**

Visible PE shall not exceed 0% opacity, as a six-minute average, from each baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC 3745-77-07(C)(1) and PTI 03-17016]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087745

Facility ID: 0381000011

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.