



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

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

CERTIFIED MAIL

Application No: 01-08622

DATE: 10/29/2002

Caledonia Farm Supply
Kenneth Comstock
P O Box 215
Caledonia, OH 43314

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

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

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 01-08622

Application Number: 01-08622
APS Premise Number: 0159000133
Permit Fee: **To be entered upon final issuance**
Name of Facility: Caledonia Farm Supply
Person to Contact: Kenneth Comstock
Address: P O Box 215
Caledonia, OH 43314

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

**Township Route 66
Canaan, Ohio**

Description of proposed emissions unit(s):

Sanders column dryer, truck loading and unloading, grain storage and handling, roadways and parking.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

Emissions Unit ID: F002

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	2.48

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - material handling, including grain receiving, loading into storage bins and buildings, conveying, and load-out	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 9.27 pounds per hour and 1.90 tons per year.</p> <p>Visible fugitive particulate emissions shall not exceed 20% opacity as a three-minute average.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p>
	OAC rule 3745-15-07	See section F.1. below.

2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to perform the following control measures to ensure compliance:

material handling operation control measure

grain dumping minimize dropping distance and utilizing a dumping spout or three sided enclosure at each dumping station

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grain load-out minimize dropping distance and utilizing adjustable telescoping spouts at each load-out station

material conveying enclosed transfer points

storage building(s) doors that are necessary to contain emissions shall be closed during unloading or transfer operations

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with the hourly limit.

B. Operational Restrictions

1. The permittee shall not receive more than 849,000 bushels of grain per year.
2. The permittee shall maintain all loading, unloading, conveying and auger system enclosures at all times during which the units are in operation in order to minimize or eliminate particulate emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep monthly records of the amount of grain received in bushels per month.
2. Except as otherwise provided in this section the permittee shall perform inspections for fugitive particulate emissions of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
loading grain	weekly; while operating
unloading grain	weekly; while operating
storage building(s)	weekly; during grain handling operations
grain handling	weekly; during grain handling operations

Emissions Unit ID: **F002**

3. The permittee shall maintain records of the above specified inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the 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 logs:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;

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

D. Reporting Requirements

- 1. The permittee shall submit semi annual written reports which:
 - a. identify all days during which any abnormal visible fugitive particulate emissions were observed from 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 Ohio EPA Central District Office by October 31 and April 30 of each year and shall cover the previous 6-month period.

- 2. The permittee shall submit annual reports which identify any exceedances of the 849,000 bushel per year of grain handled rate limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

- 1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Particulate emissions shall not exceed 9.27 pounds per hour.

Applicable Compliance Method:

Compliance was determined by multiplying the hourly capacity, 60 tons grain/hr (2,000 bushels), by the sum of the emission factors (from AP-42, Table 9.9.1-1, June 1998) multiplied by the control efficiencies (RACM for Fugitive Dust Sources, Table 2.6-3): 0.18 lb PM/ton grain received with 60% control, 0.086 lb PE/ton of grain shipped with 75% control, and 0.061 lb PE/ton grain internally handled and stored.

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PTI A

Emissions Unit ID: **F002**

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$$(60 \text{ tons grain/hr}) * ((0.18 * [1-0.6]) + (0.086 * [1-0.75]) + 0.061) \text{ lb PE/ton grain}$$
$$= 9.27 \text{ lbs PE/hr}$$

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- b. Emission Limitation:
Particulate emissions shall not exceed 1.90 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the annual throughput (in tons of grain/year), by the sum of the emission factors (from AP-42, Table 9.9.1-1, June 1998) multiplied by the control efficiencies (RACM for Fugitive Dust Sources, Table 2.6-3): 0.18 lb PM/ton grain received with 60% control, 0.086 lb PE/ton of grain shipped with 75% control, and 0.061 lb PE/ton grain internally handled and stored and dividing by 2,000 lbs/ton.

$$(24,600 \text{ tons grain/yr}) * [(0.18 * [1-0.6]) + (0.086 * [1-0.75]) + 0.061] \text{ lb PE/ton grain} / (2000 \text{ lbs/ton}) = 1.90 \text{ tons PE/year}$$

- c. Emission Limitation:
Visible fugitive particulate emissions shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

- 1. The air contaminants emitted during material handling, storage or drying of grains, as covered by this permit, shall not cause a public nuisance in violation of OAC rule 3745-15-07. Approval of this permit is based upon operation of this facility in a manner that reduces the generation of nuisance odors and particulate emissions. If the Central District Office determines through routine inspection or surveillance activities that objectionable odors or particulate emissions, this facility shall begin immediately to address the odor and/or particulate emissions and pursue resolution in an expeditious manner.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - parking and roadways	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions shall not exceed 0.58 ton per year</p> <p>There shall be no visible particulate emissions except for a period of one minute during any 60-minute observation period from a paved roadway. See section C.1 below.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See section A.2.a below.</p>

2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the paved roadways and parking areas by water and sweeping (or equivalent) at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.b The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has

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occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- 2.c The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.d Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.e Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>Parking and Roadways</u>	<u>Frequency</u>
All paved roadways and parking areas	Weekly; while in operation

- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspections shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-mentioned events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 3. The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, to modify the above-mentioned inspection frequencies if operating experience indicates that less

Emissions Unit ID: **F003**

frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in Section C.4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit semiannual deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

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Emissions Unit ID: **F003**

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- a. Emission Limitation:
Particulate emissions shall not exceed 0.58 ton per year.

Applicable Compliance method:

Compliance shall be demonstrated by multiplying the following emission factor for paved roadways (AP-42, Section 13.2.1.3, November 1997) by the annual vehicle miles traveled (VMT), dividing by 2,000 lbs/ton, and multiplying by 100% - percent control (80% for watering and sweeping applications).

EF, emission factor	= $k(sL/2)^{0.65}(W/3)^{1.5}$ (AP-42, Section 13.2.1.3, 11/1997)
k, particle size multiplier	= 0.082 lb PE/VMT (AP-42, Table 13.2-1.1, 11/1997)
sL, silt loading	= 0.4 gr/m ² (AP-42, Table 13.2.1-2, 11/1997)
W, average vehicle weight,	= 30 tons

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PTI A

Emissions Unit ID: **F003**

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$$EF = 0.082(0.4/2)^{0.65}(30/3)^{1.5} = 0.91 \text{ lb PE/VMT}$$

$$\begin{aligned} \text{VMT} &= (35 \text{ truck trips/day}) * (0.25 \text{ miles/length}) * (2 \text{ lengths/truck trip}) * (365 \text{ days/year}) \\ &= 6,387.5 \text{ VMT/year} \end{aligned}$$

$$(0.91 \text{ lb PE/VMT}) * (6,387.5 \text{ VMT/year}) / (2,000 \text{ lbs/ton}) * (1-0.8) = 0.58 \text{ ton PE/year}$$

- b. Emission limitation:
No visible particulate emissions except for 1 minute during any 60-minute period for paved roadways and parking areas.

Applicable Compliance Method:

Compliance with the emission limitation for the paved roadways and parking areas identified above shall be determined in accordance with Test Method 22 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, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None