Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

9/20/2010

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Mr. Robert Flynn
Fostoria Ethanol, LLC
2111 Sandusky Street
Fostoria, OH 44830

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0374010235
Permit Number: P0104883
Permit Type: Administrative Modification
County: Seneca

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Fostoria Ethanol, LLC

Facility ID:	0374010235
Permit Number:	P0104883
Permit Type:	Administrative Modification
Issued:	9/20/2010
Effective:	9/20/2010
Expiration:	6/26/2014

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Fostoria Ethanol, LLC

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Authorization

Facility ID: 0374010235
Application Number(s): A0037521
Permit Number: P0104883
Permit Description: Chapter 31 modification to update the VOC emission limitation and establish a by-pass operational restriction for emissions unit P010.
Permit Type: Administrative Modification
Permit Fee: $500.00
Issue Date: 9/20/2010
Effective Date: 9/20/2010
Expiration Date: 6/26/2014
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Fostoria Ethanol, LLC
2111 Sandusky Street
Fostoria, OH 44830

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104883
Permit Description: Chapter 31 modification to update the VOC emission limitation and establish a by-pass operational restriction for emissions unit P010.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P010**
Company Equipment ID:	EU029
Superseded Permit Number:	03-17304
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P010, Cooling and storage of DDGS (EU029)

Operations, Property and/or Equipment Description:

This emissions unit includes the fluid bed cooler, DDGS storage silo and DDGS flat storage.

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

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

a. b)(1)d. and d)(4).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Pneumatic fluid bed cooler		
a.	OAC rule 3745-31-05(A)(3)	**<u>Emission limits during normal operation:</u>** <u>*From Stack SV009 (RTO outlet):*</u> Nitrogen oxides (NOx) emissions from emissions units P007, P008, P009 and P010, combined, shall not exceed 11.0 pounds per hour (lbs/hr) and 48.20 tons per year (tpy). Carbon monoxide (CO) emissions from P007, P008, P009 and P010, combined, shall not exceed 10.52 lbs/hr and 46.08 tpy. Particulate matter equal to or less than 10 microns in size (PM10), from emissions

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		units P007, P008, P009 and P010, combined, shall not exceed 6.93 lbs/hr and 30.35 tpy. Volatile organic compound (VOC) emissions from P007, P008, P009 and P010, combined, shall not exceed 10.53 lbs/hr and 46.12 tpy. Visible particulate emissions (PE), from the RTO stack shall not exceed 5% opacity, as a six-minute average. *From Stack SV010 (fluid bed cooler stack):* VOC emissions shall not exceed 3.60 lbs/hr. Emissions limits during downtime of the RTO: *From fluid bed cooler stack (SV010):* VOC emissions from this emissions unit shall not exceed 8.50 lbs/hr. Emissions limits at all times: VOC emissions shall not exceed 16.0 tpy (SV010). PM10 emissions shall not exceed 0.004 grain per dry standard cubic foot (gr/dscf) and 1.50 tpy from this emissions unit (Stack SV010). Visible particulate emissions (PE), from the stack(s) serving this emissions unit, shall not exceed 0% opacity, as a six-minute average.
Storage silo and Flat storage (stacks SV011 and SV012)		
b.	OAC rule 3745-31-05(A)(3)	PM10 emissions shall not exceed 0.004 grain per dry standard cubic foot (gr/dscf) and 1.20 tpy from this emissions unit. Visible particulate emissions (PE), from the stack(s) serving this portion of the emissions unit, shall not exceed 0% opacity, as a six-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)d.
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	See b)(2)e.
d.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(4).

(2) Additional Terms and Conditions

a. Best available technology (BAT) requirements for this emissions unit has been determined to be use of the following:

i. a regenerative thermal oxidizer (RTO). The regenerative thermal oxidizer shall meet a minimum control efficiency of 90% for CO emissions, 90% for PE* and 98% for VOC emissions.

*The control of PE includes a multiclone/cyclone for removal of PE (as dried product) prior to entering the RTO. The control system shall result in a PM10 mass emission rate not to exceed 6.93 lbs/hr from the RTO.

b. Under normal operation, the exhaust stream from the fluid bed cooler is split into two streams. A portion of the stream is utilized as pre-heated combustion air to both dryers (emissions units P008 and P009) in place of fresh combustion air. This portion of the stream is eventually exhausted through the RTO. The other portion is routed to the fluid bed cooler stack (SV010).

c. When the RTO is shutdown for unscheduled maintenance* or other operational reasons, this emissions unit shall be completely routed to the fluid bed cooler stack (SV010). Down time of the RTO, while this emissions unit continues to operate, shall not exceed 100 hours per year and the permittee must also shut down emissions units P008 and P009 during the unscheduled downtime of the RTO.

*RTO shutdown for unscheduled maintenance is considered any maintenance, malfunction, etc. which the permittee does not address under the provisions of OAC rule 3745-15-06.

d. All emissions of particulate matter are PM10.

e. 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) The unscheduled down time of the RTO, while this emissions unit continues to operate, shall not exceed 100 hours per calendar year.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer 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 combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value 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 value 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 combustion temperature within the thermal oxidizer 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 average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

This value 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.

(2) The permittee shall maintain monthly records of the number of hours the RTO was shutdown while this emissions unit remained in operation [see b)(2)c. and c)(1)] (in hours per month and total hours, to date for the calendar year).

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

(4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the ***increase in the*** emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permitee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitations:

From stack SV009 (RTO stack):

VOC emissions shall not exceed 10.53 lbs/hr and 46.12 tpy (for emissions units P007, P008, P009 and P010, combined)

NOx emissions shall not exceed 11.0 lbs/hr and 48.20 tpy (for emissions units P007, P008, P009 and P010, combined)

CO emissions shall not exceed 10.52 lbs/hr and 46.08 tpy (for emissions units P007, P008, P009 and P010, combined)

PM10 emissions shall not exceed 6.93 lbs/hr and 30.35 tpy (for emissions units P007, P008, P009 and P010, combined)

Applicable Compliance Method:

Compliance with the hourly allowable emission limitations above were demonstrated based on the results of emission testing conducted in accordance with the following:

i. for PM10, Methods 201 and 202 of 40 CFR Part 51, Appendix M;
ii. for NOx, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and
iv. for total VOC, Methods 1-4, 18 and 207 of 40 CFR Part 60, Appendix A.

The annual emission limitations were developed by multiplying the respective hourly emission limitations by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitations, compliance with the annual limitations shall be assumed.

b. Emission Limitations:

From stacks SV010, SV011 and SV012, PM10 emissions shall not exceed exceed 0.004 gr/dscf and 2.70 tpy.

Applicable Compliance Method:

Compliance with the grain loading of 0.004 gr/dscf shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M.

Compliance with the annual allowable PM10 emission limitation shall be demonstrated based on the baghouse outlet grain loading and the maximum volumetric flow rate as follows:

PM10 (tons/yr) = baghouse grain loading (0.004 gr/dscf) x 1 lb/7000 gr x maximum volumetric flow rate of the baghouse (18,000 cfm*) x 60 min/hour x 8760 hours/yr x ton/2000 lbs

Therefore, as long as compliance with the 0.004 gr/dscf is maintained and the volumetric air flow rate is verified through testing, compliance with the annual PM10 limitation shall be ensured.

*The maximum flow rate is the combined flow from stacks SV010 (10,000 dscfm), SV011 and SV012 (both 4000 dscfm).

c. Emission Limitations:

VOC emissions shall not exceed 3.6 lbs/hr, during normal operation from stack SV010 (fluid bed cooler stack).

VOC emissions shall not exceed 8.5 lbs/hr, during downtime of the RTO from stack SV010 (fluid bed cooler stack).

VOC emissions shall not exceed 16.0 tpy, at all times from stack SV010 (fluid bed cooler stack).

Applicable Compliance Method:

Compliance with the hourly allowable emission limitations above were demonstrated based on the results of emission testing conducted in accordance with the Methods 1-4, 18 and 207 of 40 CFR Part 60, Appendix A.

Compliance with the annual limitation shall be demonstrated based on the record keeping required in d)(2).

d. Emission Limitation:

Visible PE from the RTO stack shall not exceed 5% opacity, as a six-minute average.

Appliance Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

e. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average from the stack(s) serving this emissions unit

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

f. Emission Limitation:

The RTO shall meet a minimum control efficiency of 98% for VOC emissions

Applicable Compliance Method:

If required, compliance with the control efficiency requirements above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1 – 4, 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Compliance with the CO destruction efficiency shall be assumed as long as compliance with the hourly CO mass emission limitation is maintained. [Due to the creation of CO in the RTO, it is not possible to perform testing to demonstrate compliance directly associated with the destruction of CO entering the RTO.]

g) Miscellaneous Requirements

(1) None.