



Environmental  
Protection Agency

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

11/1/2010

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0381000011  
Permit Number: P0107061  
Permit Type: Administrative Modification  
County: Van Wert

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Times Bulletin. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
Ohio EPA-NWDO; Michigan; Indiana



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
Bunge North America

Issue Date: 11/1/2010

Permit Number: P0107061

Permit Type: Administrative Modification

Permit Description: PTI administrative modification - establish Potential to Emit - adjust for court decision -  
Senate Bill 265

Facility ID: 0381000011

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

Facility Description: Soybean Processing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Bunge North America**

Facility ID: 0381000011  
Permit Number: P0107061  
Permit Type: Administrative Modification  
Issued: 11/1/2010  
Effective: To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install
for
Bunge North America

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. Federally Enforceable Standard Terms and Conditions ..... 4
2. Severability Clause ..... 4
3. General Requirements ..... 4
4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5
5. Scheduled Maintenance/Malfunction Reporting ..... 6
6. Compliance Requirements ..... 6
7. Best Available Technology ..... 7
8. Air Pollution Nuisance ..... 7
9. Reporting Requirements ..... 7
10. Applicability ..... 8
11. Construction of New Sources(s) and Authorization to Install ..... 8
12. Permit-To-Operate Application ..... 9
13. Construction Compliance Certification ..... 9
14. Public Disclosure ..... 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 10
16. Fees ..... 10
17. Permit Transfers ..... 10
18. Risk Management Plans ..... 10
19. Title IV Provisions ..... 10
B. Facility-Wide Terms and Conditions ..... 11
C. Emissions Unit Terms and Conditions ..... 13
1. P903, Truck Receiving ..... 14



## Authorization

Facility ID: 0381000011

Facility Description: Soybean Oil and Soybean Meal Processing Facility

Application Number(s): M0001005

Permit Number: P0107061

Permit Description: PTI administrative modification - establish Potential to Emit - adjust for court decision -  
Senate Bill 265

Permit Type: Administrative Modification

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 11/1/2010

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## **Authorization (continued)**

Permit Number: P0107061  
Permit Description: PTI administrative modification - establish Potential to Emit - adjust for court decision -  
Senate Bill 265

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

<b>Emissions Unit ID:</b>	<b>P903</b>
Company Equipment ID:	Truck Receiving
Superseded Permit Number:	03-17219
General Permit Category and Type:	Not Applicable



## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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 re-issuance, or modification.

- 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, revoked, or revoked and reissued, for cause. 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 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.

#### **4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.
- c) 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 ORC section 3704.08.
  - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- 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 state-only required 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 Ohio EPA DAPC, Northwest District Office. 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.)

## **10. 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).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

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 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).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

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

- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. 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.

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

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

**19. 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.

## **B. Facility-Wide Terms and Conditions**

**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) None.

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



1. P903, Truck Receiving

Operations, Property and/or Equipment Description:

Truck Receiving System - Soybean

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) b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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(D)	<u>baghouse stack emissions:</u> 1.05 lbs particulate matter 10 microns or less (PM <sub>10</sub> ) /hr; and 4.60 tons PM <sub>10</sub> /yr  <u>fugitive emissions:</u> 2.31 tons particulate emissions (PE) /yr  See b)(2)a, b)(2)e, and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
	40 CFR Part 60, Subpart DD	See b)(2)d.
	OAC rule 3745-17-11(B)	See b)(2)f.
	OAC rule 3745-17-07(A)	See b)(2)g.
	OAC rule 3745-17-07(B)	See b)(2)h
	OAC rule 3745-17-08(B)	See b)(2)i

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment: 1.05 lb PM<sub>10</sub> /hr and 4.60 ton PM<sub>10</sub> /yr;

All emissions of particulate matter from the baghouse stack are PM<sub>10</sub>.

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

- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

- d. The following opacity requirements apply to the "grain [truck] loading station" as specified in 40 CFR Part 60, Subpart DD:

- i. Visible stack PE shall not exceed 0% opacity, as a 6-minute average; and
- ii. Visible fugitive PE shall not exceed 5% opacity, as a 6-minute average.

The following opacity requirement applies to the "grain handling operations" as specified in 40 CFR Part 60, Subpart DD: Visible fugitive PE shall not exceed 0% opacity, as a 6-minute average.

The [gr/dscf] emission limitation specified by 40 CFR 60.302(b)(1) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

- e. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart DD.

- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D). This determination is based on all emissions of particulate matter being PM<sub>10</sub> and the established PM<sub>10</sub> limitation being more restrictive than particulate emissions limitation established

by OAC rule 3745-17-11(B). Particulate emissions (PE) measured using Method 5 of 40 CFR Part 60, Appendix A would be equivalent to the filterable particulates measured using Method 201/201A of 40 CFR, Part 51, Appendix M. A PM<sub>10</sub> limitation is more stringent due to the inclusion of condensable particulate matter measured by Method 202 of 40 CFR, Part 51, Appendix M.

- g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart DD.
- h. 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).
- i. 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) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. This emissions unit shall employ a two-sided enclosure (with employable third side) with aspiration to a baghouse system capable of meeting a maximum outlet concentration of 0.005 gr PM<sub>10</sub> /dscf.

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 the facility's Title V permit by means of a administrative permit modification.

- (2) 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 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 visible emissions.

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).

- (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.

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 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit. (Emission testing was conducted in February 2008.)
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable maximum outlet concentration for PM<sub>10</sub> and opacity requirements for PE.
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions: for PM<sub>10</sub>, Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M, and for Opacity, Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).
  - d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.
- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the

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

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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO 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 Ohio EPA, NWDO.

- (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 PM<sub>10</sub> /dscf (stack)

Applicable Compliance Method:

Compliance with the allowable PM<sub>10</sub> limitation was demonstrated by emission testing in February 2008.

If required, additional testing shall be conducted in accordance with Method 201, 201A, and/or 202 of 40 CFR 51, Appendix M.

- b. Emission Limitation:  
1.05 lbs PM<sub>10</sub> /hr; 4.60 tons PM<sub>10</sub> /yr (stack)

Applicable Compliance Method:

The pounds per hour emission limitation was developed by multiplying the emission limitation of 0.005 gr PM<sub>10</sub> /dscf by the maximum volumetric flow rate (24,500 acfm), and applying the conversion factors of 60 minutes/hour and 7000 grains/pound.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Method 201, 201A, and/or 202 of 40 CFR 51, Appendix M.

The tons per year emission limitation was developed by multiplying the emission limitation of 0.005 gr PM<sub>10</sub> /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 PM<sub>10</sub> /dscf, compliance with the annual limitation shall also be demonstrated.

- 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.

\* The Title V [renewal] permit for this facility has an established restriction on grain throughput of 647,875 tons per year [See condition c)(2) for emissions unit P031]. Worst case emissions are based on 75% of the throughput from hopper truck receiving and 25% from straight truck receiving.

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the 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.

e. Emission Limitation:

grain [truck] loading station:

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

grain handling operations:

Visible fugitive 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 further demonstrate compliance with the visible emission limitation(s) 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).

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.
- (2) This permit supersedes Permit to Install (PTI) 03-17219 issued January 23, 2007 for this emissions unit.