



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

1/27/2011

SPUD GUSTIN  
WINCHESTER AG SERVICE INC  
PO BOX 205  
WINCHESTER, OH 45697

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0701000041  
Permit Number: P0091210  
Permit Type: Renewal  
County: Adams

Certified Mail

|    |                                    |
|----|------------------------------------|
| 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) |

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](http://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 Josh Mandel," 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 Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 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](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Portsmouth





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
WINCHESTER AG SERVICE INC**

|                |            |
|----------------|------------|
| Facility ID:   | 0701000041 |
| Permit Number: | P0091210   |
| Permit Type:   | Renewal    |
| Issued:        | 1/27/2011  |
| Effective:     | 1/27/2011  |
| Expiration:    | 1/27/2021  |





Division of Air Pollution Control
Permit-to-Install and Operate
for
WINCHESTER AG SERVICE INC

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
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? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 6
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 10
1. F001, Truck/railcar grain unloading transferring, and conveying ..... 11
2. F004, Truck/railcar grain loading ..... 14
3. F005, Fertilizer Plant..... 17
4. F006, Plant roadways & parking areas..... 21
5. F007, Meyer column grain dryer..... 23



## Authorization

Facility ID: 0701000041  
Application Number(s): A0022571, A0022572, A0022573, A0022574, A0022575  
Permit Number: P0091210  
Permit Description: Renewal PTIO for existing plant roadways & parking areas, truck / railcar grain unloading, transferring, conveying, truck/railcar grain loading, fertilizer plant, and column grain dryer  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/27/2011  
Effective Date: 1/27/2011  
Expiration Date: 1/27/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

WINCHESTER AG SERVICE INC  
1350 TRI COUNTY ROAD  
Winchester, OH 45697

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

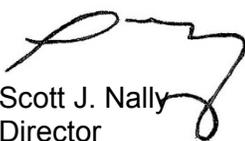
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit  
605 Washington Street  
3rd Floor  
Portsmouth, OH 45662  
(740)353-5156

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

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0091210  
Permit Description: Renewal PTIO for existing plant roadways & parking areas, truck / railcar grain unloading, transferring, conveying, truck/railcar grain loading, fertilizer plant, and column grain dryer

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

- Emissions Unit ID: F001**  
Company Equipment ID: Truck/railcar grain, unloading transferring and conveying  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F004**  
Company Equipment ID: Truck/railcar grain unloading  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F005**  
Company Equipment ID: Fertilizer Plant  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F006**  
Company Equipment ID: Plant roadways & parking areas  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F007**  
Company Equipment ID: Meyer column grain dryer  
Superseded Permit Number:  
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 Portsmouth City Health Dept., Air Pollution Unit 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<sup>1</sup> 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 under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or

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<sup>1</sup> 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).

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. F001, Truck/railcar grain unloading transferring, and conveying

Operations, Property and/or Equipment Description:

F001 Truck/railcar grain unloading transferring, and conveying

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                               | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 07-331, issued 4-20-1994) | The permittee shall operate the control measures (BAT) consisting of bottom unloading and enclosed conveyors and transfer points in such a manner as to minimize or eliminate visible emissions of fugitive dust to the ambient air. Visible particulate emissions of fugitive dust shall not exceed 5% opacity.<br><br>Fugitive particulate emissions (PE) shall not exceed 0.072 lb PM/ton of grain unloaded, 0.00122 lb PM/ton of grain conveying & transferring, and 54.92 tons per year. |
| b. | OAC rule 3745-17-07(B)                                      | See b)(2)a.   |
| c. | OAC rule 3745-17-08(B)                                      | See b)(2)b.   |

- (2) Additional Terms and Conditions
- a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
  - b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- c) Operational Restrictions
- (1) The maximum annual operating hours for this emissions unit shall not exceed 5000, based upon a rolling, 12 month summation of the operating hours.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records which list the following information for this emissions unit:
    - a. The operating hours for each month and the rolling, 12 month summation of the operating hours;
    - b. Tons of grain unloaded (received); and
    - c. Tons of grain stored
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitations:  
PM emissions for unloading shall not exceed 0.072 lb/ton  
  
Applicable Compliance Method:  
Compliance with the emission limitations shall be determined by the emission factors provided in AP-42, Section 9.9, Table 9.9.1-1 for Grain Elevators dated

April 2003. The control efficiency was obtained from RACM, Table 2.6-3, dated 10/80.

Unloading (receiving) emission limitation was developed by multiplying the emission factor of 0.18 lbs PE/ton by the control efficiency of 60%.

b. Emission Limitations:

PM emissions for transfer and conveying shall not exceed 0.00122 lb/ton

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided in AP-42, Section 9.9, Table 9.9.1-1 for Grain Elevators dated April 2003, the control efficiency was obtained from RACM, Table 2.6-3, dated 10/80.

Transfer and Conveying emission limitation was developed by multiplying the emission factor of 0.061 lbs PE/ton by the control efficiency of 90%.

c. Emission Limitations:

PM emissions shall not exceed 54.92 tons per year

Applicable Compliance Method:

Compliance with the annual fugitive particulate emissions limitation is determined by the summation of grain unloading ton per year and transfer and conveying ton per year using the emission factors provided in AP-42, Section 9.9, Table 9.9.1-1 for Grain Elevators dated April 2003, the control efficiency obtained from RACM, Table 2.6-3, dated 10/80, the maximum throughput (T/hr) and the maximum annual hours of operation.

Grain unloading TPY=  $300\text{TPH} \times 0.18 \text{ lb/ton (EF)} \times 60\% \text{ CE} \times (5000\text{hrs/yr}) / (2000 \text{ lb/ton})$

Transfer and Conveying TPY=  $300\text{TPH} \times 0.061 \text{ lb/ton (EF)} \times 90\% \text{ CE} \times (5000 \text{ hrs/yr}) / (2000 \text{ lb/ton})$ .

d. Emission Limitations:

Visible fugitive PE shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.



2. F004, Truck/railcar grain loading

Operations, Property and/or Equipment Description:

F004 Truck/railcar grain loading

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                               | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 07-331, issued 4-20-1994) | The permitte shall operate the control measures (BAT) consisting of the use of a telescopic chute in such a manner as to minimize or eliminate visible emissions of fugitive dust to the ambient air. Visible particulate emissions of fugitive dust shall not exceed 5% opacity.<br><br>Fugitive particulate emissions (PE) shall not exceed 0.075 lbs PM/ton of grain loaded, and 39.38 tons per year. |
| b. | OAC rule 3745-17-07(B)                                      | See b)(2)a.  |
| c. | OAC rule 3745-17-08(B)                                      | See b)(2)b.  |

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-

07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

- b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- c) Operational Restrictions
  - (1) The maximum annual operating hours for this emissions unit shall not exceed 5000, based upon a rolling, 12 month summation of the operating hours.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) This permittee shall maintain monthly records which list the following information for this source:
    - a. The operating hours for each month and the rolling, 12 month summation of the operating hours;
    - b. Tons of grain loaded (shipped); and
    - c. Tons of grain stored
- e) Reporting Requirements
  - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
  - (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitations:

PM emissions shall not exceed 0.075 lb/ton

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided in AP-42, Section 9.9, Table 9.9.1-1 for Grain Elevators dated April 2003 and the control efficiency was obtained from RACM, Table 2.6-3, dated 10/80.

Loading (shipping) lb/ton = 0.3 lb/ton (EF) \* 75% CE.

b. Emission Limitations:

PM emissions shall not exceed 39.38 tons per year

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided in AP-42, Section 9.9, Table 9.9.1-1 for Grain Elevators dated April 2003, the control efficiency obtained from RACM, Table 2.6-3, dated 10/80, the maximum hourly throughput and the maximum annual hours of operation.

Grain loading TPY=210 TPH \* 0.3 lb/ton (EF)\*75% CE \* (5000 hrs/yr) / (2000lb/ton).

c. Emission Limitations:

Visible fugitive PE shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.



3. F005, Fertilizer Plant

Operations, Property and/or Equipment Description:

F005 Fertilizer Plant

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements                               | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 07-331, issued 4-20-1994) | The permittee shall operate the control measures (BAT) consisting of bottom unloading and enclosed conveyors and mixing & blending operations enclosed in a building. Visible particulate emissions of fugitive dust shall not exceed 5% opacity.<br><br>Allowable particulate emissions (PE) shall not exceed 0.05 lbs PM/ton of material loaded, 0.1 lbs PM/ton of fertilizer mixing & blending, 0.05 lbs PM/ton fertilizer loaded, and 16.5 tons per year. |
| b. | OAC rule 3745-17-07(B)                                      | See b)(2)a.   |
| c. | OAC rule 3745-17-08(B)                                      | See b)(2)b.   |

- (2) Additional Terms and Conditions
- a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
  - b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- c) Operational Restrictions
- (1) The maximum annual operating hours for this emissions unit shall not exceed 3000, based upon a rolling, 12 month summation of the operating hours.
- d) Monitoring and/or Recordkeeping Requirements
- (1) This permittee shall maintain monthly records which list the following information for this source:
    - a. The operating hours for each month and the rolling, 12 month summation of the operating hours;
    - b. Tons of material unloaded (received) at fertilizer plant;
    - c. Tons of fertilizer produced; and
    - d. Tons of fertilizer loaded(shipped)
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitations:  
PM emissions for loading shall not exceed 0.05 lb/ton

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided from RACM, Table 2.12-1, dated 10/80. The control efficiency was obtained from RACM, Table 2.12-2, dated 10/80.

Unloading lb/ton = 0.2 lb/ton (EF) \* 75% CE.

b. Emission Limitations:

PM emissions for mixing and blending shall not exceed 0.1 lb/ton

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided from RACM, Table 2.12-1, dated 10/80. The control efficiency was obtained from RACM, Table 2.12-2, dated 10/80.

Mixing/Blending lb/ton = 0.2lb/ton (EF) \* 50% CE.

c. Emission Limitations:

PM emissions fertilizer loading shall not exceed 0.05 lb/ton

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided from RACM, Table 2.12-1, dated 10/80. The control efficiency was obtained from RACM, Table 2.12-2, dated 10/80.

Loading lb/ton = 0.2 lb/ton (EF) \* 75% CE.

d. Emission Limitations:

PM emissions shall not exceed 16.5 tons per year

Applicable Compliance Method:

Compliance with the annual fugitive particulate emissions limitation is determined by the summation of unloading ton per year, mixing/blending ton per year and loading ton per year using the emission factors provided from RACM Table 2.12-1 for Fertilizer Mixing/Blending Plants, the applicable control efficiency, the maximum hourly throughput and the maximum annual hours of operation.

Unloading TPY= 50TPH\*0.2 lb/ton (EF)\*75% (CE) \*(3000 hrs/year)/(2000 lb/ton)

Mixing/blending TPY= 60TPH\*0.2 lb/ton (EF)\*50% (CE) \*(3000 hrs/year)/(2000 lb/ton)

Loading TPY= 50TPH\*0.2 lb/ton (EF)\*75% (CE)\*(3000 hrs/year)/ (2000 lb/ton)



e. Emission Limitations:

Visible fugitive PE shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.



4. F006, Plant roadways & parking areas

Operations, Property and/or Equipment Description:

F006 Unpaved roadways & parking areas

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                               | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 07-331, issued 4-20-1994) | <p>This permittee shall apply water or other suitable dust suppression chemicals as often as necessary on all unpaved roads and parking areas in order to minimize or eliminate all visible emissions of fugitive dust.</p> <p>There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three (3) minutes during any sixty-minute observation period.</p> <p>Speed zones of no more than ten (10) miles per hour shall be established, posted, and enforced for all vehicles operating within the facility or on facility-controlled access roads.</p> <p>Open bodied vehicles transporting</p> |



|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures                  |
|----|-------------------------------|--|
|    |                               | materials likely to become airborne shall be covered at all times. |
| b. | OAC rule 3745-17-07(B)        | See b)(2)a.  |
| c. | OAC rule 3745-17-08(B)        | See b)(2)b.  |

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

e) Reporting Requirements

- (1) None.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



5. F007, Meyer column grain dryer

Operations, Property and/or Equipment Description:

F007 Meyer column grain dryer

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                                   | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3)(a)<br>(PTI 07-462, issued 08-05-1998) | Particulate emissions (PM) shall not exceed 11.88 pounds per hour and 29.7 tons per year.<br><br>No visible particulate emissions of fugitive dust.<br><br>See b)(2)a. |
| b. | OAC rule 3745-17-07(B)  | See b)(2)b.  |
| c. | OAC rule 3745-17-08(B)  | See b)(2)c.  |

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirement for this emissions unit has been determined to be the use of column plate perforation with a diameter equal to or less than 0.078 inches. BAT requirements also include compliance with the terms and conditions of this permit.

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

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 5000, based upon a rolling, 12-month summation of the operating hours.
- (2) The permittee shall be restricted to only burning propane or natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.

e) Reporting Requirements

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

f) Testing Requirements

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

- a. Emissions Limitation:

PM emissions shall not exceed 11.88 pounds per hour

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided in AP-42, Section 9.9, Table 9.9.1-1 for Grain Elevators dated April 2003.

Multiply the maximum hourly production rate of the dryer, 54 ton/hr, by the AP-42 emission factor of 0.22 lb PM/ton grain dried.

b. Emission Limitation:

PM emissions shall not exceed 29.7 tons per year

Applicable Compliance Method:

Compliance with the emission limitations shall be determined by using the emission factors provided in AP-42, Section 9.9, Table 9.9.1-1 for Grain Elevators dated April 2003

Multiply the 11.88 lb PM/hr emission limitation by the maximum annual operating hours restriction of 5000 hours per year divided by ton per 2000 lbs.

c. Emission Limitation:

No visible particulate emissions of fugitive dust.

Applicable Compliance Method:

If required, compliance with the visible emission limitations shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A. Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

g) Miscellaneous Requirements

(1) None.