



Environmental Protection Agency

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

3/25/2011

Beth York
ADM GRAIN COMPANY
4666 Faries Pkwy
DECATUR, IL 62526

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448010313
Permit Number: P0105871
Permit Type: Renewal
County: Lucas

Certified Mail

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| Yes | 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 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 Toledo Department of Environmental Services at (419)936-3015 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: TDES



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ADM GRAIN COMPANY**

| | |
|----------------|------------|
| Facility ID: | 0448010313 |
| Permit Number: | P0105871 |
| Permit Type: | Renewal |
| Issued: | 3/25/2011 |
| Effective: | 3/25/2011 |
| Expiration: | 4/6/2019 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
ADM GRAIN COMPANY

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Authorization

Facility ID: 0448010313
Application Number(s): A0037706
Permit Number: P0105871
Permit Description: PTIO Renewal of F008 installed under the authority of PTI 04-927 and P907 installed under PTI 04-113
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/25/2011
Effective Date: 3/25/2011
Expiration Date: 4/6/2019
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

ADM GRAIN COMPANY
1308 MIAMI ST
Toledo, OH 43605

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

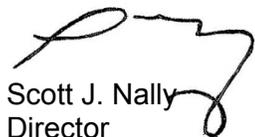
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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: P0105871
Permit Description: PTIO Renewal of F008 installed under the authority of PTI 04-927 and P907 installed under PTI 04-113

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

| | |
|-----------------------------------|--|
| Emissions Unit ID: | F008 |
| Company Equipment ID: | Vessel Unloading - Grain |
| Superseded Permit Number: | P0088117 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P907 |
| Company Equipment ID: | DS2 through DS5, DS10, DS12, DS13 and DS14 |
| 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 Toledo Department of Environmental Services 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 submitting¹ 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.

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).

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 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.
2. The following emission unit contained in this permit is subject to 40 CFR Part 60, Subpart DD: F008. The complete NSPS requirements, including the NSPS general provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions



1. F008, Vessel Unloading - Grain

Operations, Property and/or Equipment Description:

Ship unloading controlled by a capture and control system with fabric filter

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)b., b)(2)b., c)(1), d)(1), e)(1) and f)(1)e.

(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) (PTI 04-927 issued 3/26/97) | the emissions of particulate matter (fugitive and stack) equal to or less than ten microns in diameter (PM10) from the ship unloading operation shall not exceed 12.6 pounds per hour see b)(2)a. |
| b. | OAC rule 3745-31-05(E) (PTI 04-927 issued 3/26/97) | the emissions of particulate matter (fugitive and stack) equal to or less than ten microns in diameter (PM10) from the ship unloading operation shall not exceed 1.13 tons per calendar year see b)(2)b. |
| c. | OAC rule 3745-17-07(B)(1) | see b)(2)c. |
| d. | OAC rule 3745-17-08(B)(3) | see b)(2)d. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| e. | <p>40 CFR Part 60, Subpart DD (40 CFR 60.300-304)</p> <p>[In accordance with 40 CFR 60.302(b) and 60.302(d)(3), this emission unit is a ship unloading station at a grain terminal elevator subject to the control measures specified in this section]</p> | <p>particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.023 gram per dry standard cubic meter (0.01 grain per dry standard cubic foot)</p> <p>visible particulate emissions from the stack serving this emissions unit shall not exceed zero percent opacity</p> <p>see b)(2)e.</p> |

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), (B)(3) and 40 CFR Part 60, Subpart DD.
- b. The maximum annual throughput for this emissions unit shall not exceed 200,000 tons as a calendar year summation.
- c. Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart DD. Implementation of the 40 CFR Part 60, Subpart DD control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.
- e. In accordance with 40 CFR 60.302(d)(3), the permittee shall use methods of emission control demonstrated to the Administrator's satisfaction to reduce emissions of particulate matter to the same level as, or less than, the requirements of 40 CFR 60.302(d)(1) and (d)(2). These equivalent methods have been determined to be the use of a self-unloading ship, discharging into a receiving hopper equipped with a dust collection system, utilizing a fabric filter and enclosed conveyors.

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 200,000 tons as a calendar year summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records:

- a. the date of receipt for each shipment of grain;
 - b. the total quantity of grain unloaded for each shipment, in tons per shipment;
 - c. the total quantity of grain unloaded, in tons, as a calendar year summation.
- (2) The permittee shall perform daily checks, when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from any egress points (i.e., conveyor enclosure, hopper transfer point, etc.) serving the ship unloading operations. 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report any periods of time during which the total throughput of grain exceeded the allowable limitation.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
 - a. all days during which any visible fugitive particulate emissions were observed from any point(s) of capture between the emissions unit and control device or from the area immediately above the capture system serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to eliminate the visible particulate emissions.

- (3) Until such time as the testing requirements of f)(2) are satisfied, the permittee shall identify the following information in the annual permit evaluation report in accordance with the requirement for stack testing:
 - a. the date of receipt for each shipment of grain; and
 - b. the total quantity of grain unloaded for each shipment of grain, in tons.
- (4) 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) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

visible particulate emissions from any stack shall not exceed zero percent opacity.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in 40 CFR 60.303(b).

- b. **Emission Limitation:**

visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

- c. **Emission Limitation:**

PE shall not exceed 0.023 gram per dry standard cubic meter (0.01 grain per dry standard cubic foot).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303(b).

d. Emission Limitation:

emissions of PM10 shall not exceed 12.6 pounds per hour.

Applicable Compliance Method:

The emissions of PM10 may be estimated based on calculations utilizing emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, as follows: multiply the emission factor for grain receiving by ship (0.038 pound of PM10 emissions per ton of grain received) by design maximum hourly throughput rate for this emissions unit, and by one minus the 40 CFR 60.302(d) equivalent overall control efficiency (1- 0.97).

If required, the permittee shall establish a site specific emission factor, in pounds of PM10 emissions per ton of grain received, in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

emissions of PM10 shall not exceed 1.13 tons per calendar year.

Applicable Compliance Method:

The emissions of PM10 may be estimated based on calculations utilizing emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, as follows: multiply the emission factor for grain receiving by ship (0.038 pound of PM10 emissions per ton of grain received) by the maximum annual throughput for this emissions unit (200,000 tons calendar year), and by one minus the 40 CFR 60.302(d) equivalent overall control efficiency (1- 0.97) and then divide by 2000 pounds per ton.

If required, the permittee shall establish a site specific emission factor, in pounds of PM10 emissions per ton of grain received, in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

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

- a. The emissions testing shall be conducted for the first shipment of 5,000 tons, or greater, of grain received 60 days, or later, after of the effective date of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the NSPS requirements of 0.023 gram PE per dry standard cubic meter and 0 percent opacity from the stack.
- c. The particulate concentration shall be determined by testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303(b).

- d. The stack opacity shall be determined visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in 40 CFR 60.303(b).
- e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Director's refusal to accept the results of the emission tests.

Personnel from the Toledo Division of Environmental Services shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

- g) **Miscellaneous Requirements**
 - (1) None.



2. P907, DS2 through DS5, DS10, DS12, DS13 and DS14

Operations, Property and/or Equipment Description:

transferring conveying, screening and cleaning controlled by a capture and control system with fabric filter

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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) (PTI 04-113 issued 3/26/97) with detailed emission limits for DS2, DS3, DS4, and DS5.



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--------------------------------|---|
| | | <p>visible particulate emissions from the stacks associated with DS2 through DS5 shall not exceed zero percent opacity as a six-minute average</p> <p>visible emissions of fugitive dust from the processes served by DS2 through DS5 shall not exceed zero percent opacity as a three-minute average</p> <p>the processes served by DS2 through DS5 shall utilize best available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust</p> <p>see b)(2)a. and b)(2)b.</p> |
| b. | OAC rule 3745-17-07(A)(1) | visible particulate emissions from the stacks associated with DS10, DS12, DS13 and DS14 shall not exceed twenty percent opacity as a six-minute average. |
| c. | OAC rule 3745-17-07(B)(1) | visible emissions of fugitive dust from the processes served by DS10, DS12, DS13 and DS14 shall not exceed twenty percent opacity as a three-minute average. |
| d. | OAC rule 3745-17-08(B), (B)(3) | <p>the processes served by DS10, DS12, DS13 and DS14 shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust</p> <p>see b)(2)a. and b)(2)b.</p> |
| e. | OAC rule 3745-17-11(B)(1) | the combined PE from all stacks serving this emissions unit shall not exceed 8.32 pounds per hour |

(2) Additional Terms and Conditions

- a. In accordance with the permittee's application, the permittee has committed to adequately enclose the processes associated with this emissions unit and vent all captured emissions to a fabric filter particulate control system. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08 and the best available control measures of OAC rule 3745-31-05.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible particulate emissions of fugitive dust from points of capture between the emissions unit and the control device and, when the weather conditions allow, any visible particulate emissions from the exhaust stack from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- e) Reporting Requirements
 - (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
 - a. all days during which any visible fugitive particulate emissions were observed from any point(s) of capture between the emissions unit and control device or from the area immediately above the capture system serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack(s) serving this emission unit; and

- c. any corrective actions taken to eliminate the visible particulate emissions.
- (2) 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) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

visible particulate emissions from the stacks shall not exceed zero percent opacity as a six-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

visible particulate emissions from the stacks shall not exceed twenty percent opacity as a six-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation:

visible emissions of fugitive dust shall not exceed zero percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).
 - d. Emission Limitation:

visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

e. Emission Limitation:

PE shall not exceed 0075 grain of particulate per dry standard cubic foot from the stacks serving DS-2 through DS-5.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(7).

f. Emission Limitation:

PE from the stacks serving this emissions unit shall not exceed:

- i. for DS-2, 2.55 pounds per hour and 11.17 tons per year;
- ii. for DS-3, 2.55 pounds per hour and 11.17 tons per year;
- iii. for DS-4, 2.50 pounds per hour and 10.94 tons per year; and
- iv. for DS-5, 2.13 pounds per hour and 9.32 tons per year.

Applicable Compliance Method:

The hourly emissions of PE may be estimated through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, as follows: multiply the emission factor for the headhouse and grain handling (legs, conveyors, belts, distributor, scale, enclosed cleaners, etc.) (0.061 pound of PE emissions per ton of grain received) by design maximum hourly throughput rate for this emissions, by the capture efficiency and one minus the control efficiency.

If required, the permittee shall demonstrate compliance with this emission limitation(s) through emission testing performed in accordance with Method 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

The annual emission limitations were developed by multiplying the hourly allowable particulate emission limitation (in lbs/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

combined PE from all stacks serving this emissions unit shall not exceed 8.32 pounds per hour.

Applicable Compliance Method:

The hourly emissions of PE may be estimated through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, as follows: multiply the emission factor for the headhouse and grain handling (legs, conveyors, belts, distributor, scale, enclosed cleaners, etc.) (0.061 pound of PE emissions per ton of grain received) by design maximum hourly throughput rate for this emissions, by the capture efficiency and one minus the control efficiency.

If required, the permittee shall demonstrate compliance with this emission limitation(s) through emission testing performed in accordance with Method 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g) Miscellaneous Requirements

(1) None.