



Environmental Protection Agency

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

4/28/2011

MICHAEL MUSGRAVE  
BLANCHARD VALLEY FARMERS COOPERATIVE  
501 S COUNTYLINE ST  
PO BOX 1045  
FOSTORIA, OH 44830

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

Facility ID: 0332010178  
Permit Number: P0107139  
Permit Type: OAC Chapter 3745-31 Modification  
County: Hancock

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 Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](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: Ohio EPA-NWDO

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)





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
BLANCHARD VALLEY FARMERS COOPERATIVE**

Facility ID: 0332010178  
Permit Number: P0107139  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 4/28/2011  
Effective: 4/28/2011  
Expiration: 4/28/2021





Division of Air Pollution Control
Permit-to-Install and Operate
for
BLANCHARD VALLEY FARMERS COOPERATIVE

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## Authorization

Facility ID: 0332010178  
Application Number(s): A0040635  
Permit Number: P0107139  
Permit Description: Modification to Roadways and Parking Areas, Railcar & Truck Unloading, Grain Transfer, and Screening & Cleaning, Truck Loading, and Rail & Truck Loading  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$3,950.00  
Issue Date: 4/28/2011  
Effective Date: 4/28/2011  
Expiration Date: 4/28/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BLANCHARD VALLEY FARMERS COOPERATIVE  
501 S COUNTYLINE ST  
Fostoria, OH 44830

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

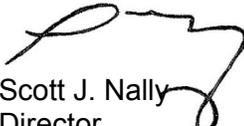
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0107139  
Permit Description: Modification to Roadways and Parking Areas, Railcar & Truck Unloading, Grain Transfer, and Screening & Cleaning, Truck Loading, and Rail & Truck Loading

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>F002</b>
Company Equipment ID:	F002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	F004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	F003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P902</b>
Company Equipment ID:	F005
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 Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<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.

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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).

**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 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. F002

Operations, Property and/or Equipment Description:

Roadways and 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.

b)(1)c.

(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 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(F) | 0.71 ton of fugitive particulate matter 10 microns or less in size (PM10)/year. Includes sub-sections for Paved Roadways and Parking Areas and Unpaved Roadways and Parking Areas.



Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05 (A)(3)(a)(ii), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B).

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE).
i. the emission limitations and visible emission restrictions contained in b)(1)a.; and
ii. use of best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
b. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
paved roadways and parking areas
all paved roadways and parking areas
c. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
unpaved roadways and parking areas
all unpaved roadways and parking areas
d. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements.
e. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements.

permittee's permit application, the permittee has committed to treat the unpaved roadways with chemical stabilization as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for the day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking areas that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- i. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

Voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)k.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit as indicated above. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 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, then these emission limits/control measures no longer apply.

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

- k. 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) do not apply to the PM10 emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- l. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that does not involve an established NAAQS.

- m. 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).

- n. 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) None

d) Monitoring and/or Recordkeeping Requirements

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

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all paved roadways and parking areas	once during each day of operation

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all unpaved roadways and parking areas	once during each day of operation

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (3) The permittee shall maintain records of the following information:
- a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation.
  - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures.
  - c. The dates the control measures were implemented.
  - d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
- (4) The information required in d)(3)d. shall be kept separately for the paved roadways and parking areas and for the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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 12 months for each air contaminant source identified in this permit.
- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(3) above:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency, and control measure(s) were properly implemented.

f) Testing Requirements

- (1) 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:



- a. Emission Limitation:  
0.71 ton of fugitive particulate matter 10 microns or less in size (PM10)/year

Applicable Compliance Method:  
The PM10 limitation was determined by summing the following calculations:

- i. multiplying an AP-42 emission factor for unpaved roadways of 4.04 lbs of PM10/VMT [Section 13.2.2 (11/06)] by a maximum of 170 vehicle miles traveled per year, a control efficiency of 80% for watering, and dividing by 2000 lbs/ton.
- ii. multiplying an AP-42 emission factor for paved roadways of 1.07 lbs of PM10/VMT [Section 13.2.1 (11/06)] by a maximum of 5944 vehicle miles traveled per year, a control efficiency of 80% for sweeping, and dividing by 2000 lbs/ton.

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PM10 limitation shall also be demonstrated.

- b. Emission Limitation:  
No visible PE from paved roadways and parking areas except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:  
If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

- c. Emission Limitation:  
No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:  
If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None



2. P901

Operations, Property and/or Equipment Description:

Truck Receiving, Railcar Unloading, Grain Transfer, Screening and Cleaning

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.

b)(1)c.

(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 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(F)	Emission limitations, opacity restrictions, operational restrictions, and control requirements [see b)(2)a, c)(1), and c)(2)]
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c.
d.	40 CFR Part 60 Subpart DD	See b)(2)e.
e.	OAC rule 3745-17-07(B)	See b)(2)f.
f.	OAC rule 3745-17-08(B)	See b)(2)g.
g.	OAC rule 3745-17-11(B)	See b)(2)h.
h.	OAC rule 3745-17-07(A)	See b)(2)h.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(2) which require control equipment and measures:

- i. combined stack emission limitations for emissions units P901 and P902 of 2.25 pounds of PM10/hour and 0.41 ton of PM10/year for emissions from the Carter-Day/Donnelson dust collector. The stack emission limitations from the Carter-Day/Donnelson dust collector address truck grain receiving to truck dump pits #1,2,3,&4 and transferring/conveying for emissions unit P901 and transferring/conveying operations for emissions unit P902\*;
- ii. visible PE from the stack serving the Carter-Day/Donnelson dust collector shall not exceed 0% opacity as a six-minute average;
- iii. fugitive emission limitation for truck grain receiving to truck dump pits #1,2,3,&4 of 3.82 tons of PM10/year;
- iv. visible fugitive particulate emission limitation of 5% opacity as a six-minute average from enclosure serving truck grain receiving to truck dump pits #1,2,3,&4;
- v. visible fugitive particulate emissions from enclosed transferring/conveying operations shall not exceed 0% opacity as a six-minute average;
- vi. stack emission limitations for screening/cleaning operations of 0.20 pound of PM10/hour and 0.03 ton of PM10/year for emissions from the MAC dust collector\*;
- vii. visible PE from the stack serving the MAC dust collector shall not exceed 5% opacity as a six-minute average;
- viii. fugitive emission limitation for screening/cleaning operations of 0.02 ton of PM10/year;
- ix. visible fugitive particulate emission limitation of 10% opacity as a six-minute average from screening/cleaning operations;
- x. fugitive emission limitation for railcar unloading operations of 0.04 ton of PM10/year; and
- xi. visible fugitive particulate emission limitation of 5% opacity as a six-minute average from railcar unloading operations;

\*All emissions of particulate matter from dust collectors are PM10.

- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

It should be noted that the voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 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 ORC changes effective August 3, 2006 (S.B. 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, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) 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) 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 practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that does not involve an established NAAQS.
- e. The provisions of 40 CFR Part 60 Subpart DD apply to the following operations (identified as affected facilities in 40 CFR 60.300) of this emissions unit based on construction/modification date of affected facility:
- i. truck grain receiving to truck dump pit #3;
  - ii. truck grain receiving to truck dump pit #4; and
  - iii. grain transferring/conveying operations.

The requirements specified by this rule are equivalent to or less stringent than the voluntary restrictions established under OAC rule 3745-31-05(F).

- f. 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).

- g. 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).
- h. The emission limitation specified by this rule is less stringent than the voluntary restrictions established under OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit to represent the maximum potential throughput for individual elevator operations:
  - a. The maximum throughput for truck receiving shall not exceed 517,200 tons of grain per year.
  - b. The maximum throughput for transferring/conveying for this emissions unit shall not exceed 517,200 tons of grain per year.
  - c. The maximum throughput for railcar unloading shall not exceed 1,241 tons of grain per year.
  - d. The maximum throughput for screening/cleaning shall not exceed 101,500 tons of grain per year.
- (2) The following operational restrictions has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:
  - a. truck receiving operations shall be controlled by a three-sided enclosure vented to a dust collector achieving a maximum outlet concentration of 0.01 grain of PM10/dscf (75% capture efficiency - 99% removal efficiency\* - 74.25% overall control);  
  
\*the maximum outlet concentration of 0.01 grain of PM10/dscf corresponds to a 99% removal efficiency
  - b. transferring/conveying operations shall be totally enclosed and be vented to a dust collector achieving a maximum outlet concentration of 0.01 grain of PM10/dscf (totally enclosed - 99% removal efficiency\* - 99% overall control);  
  
\*the maximum outlet concentration of 0.01 grain of PM10/dscf corresponds to a 99% removal efficiency
  - c. screening/cleaning operations shall be controlled by a dust collector achieving a minimum removal efficiency of 95% (90% capture - 95% removal efficiency - 85.5% overall control);
  - d. all grain processed through the transferring/conveying and screen/cleaning operations shall have been treated with mineral oil. The mineral oil may be applied at any operation at the grain elevator preceding these operations (i.e., oil may be applied at grain receiving operations).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of material throughput for each of the following individual operations for this emissions unit, in tons per month and total tons, to date, for the calendar year:
  - a. throughput for truck grain receiving;
  - b. throughput for grain transferred/conveyed in this emission unit;
  - c. throughput for railcar unloading; and
  - d. throughput for screening/cleaning operations.
- (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 the following for this emissions unit:
  - a. the three-sided enclosure on truck grain dump pits #1,2,3,&4;
  - b. the totally enclosed transferring/conveying operations;
  - c. the enclosure around screening/cleaning operations; and
  - d. railcar unloading operations.

The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- e. for the totally enclosed transferring/conveying operations:
  - i. the location and color of the emissions;
  - ii. the total duration of any visible emission incident; and
  - iii. any corrective actions taken to eliminate the visible emissions.
- f. for the three-sided enclosure on truck grain dump pits #1,2,3,&4, the enclosure around screening/cleaning operations, and the railcar unloading operations:
  - i. the location and color of the emissions;
  - ii. whether the emissions are representative of normal operations;
  - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - iv. the total duration of any visible emission incident; and
  - v. 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)(2)f.iv. 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.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving the following for this emissions unit:
- a. the Carter-Day/Donnelson dust collector controlling truck dump pits #1,2,3,&4 and transferring/conveying operations; and
  - b. the MAC dust collector controlling screening/cleaning operations.

The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- c. for the Carter-Day/Donnelson dust collector:
    - i. the color of the emissions;
    - ii. the total duration of any visible emission incident; and
    - iii. any corrective actions taken to eliminate the visible emissions.
  - d. for the MAC dust collector:
    - i. the color of the emissions;
    - ii. whether the emissions are representative of normal operations;
    - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - iv. the total duration of any visible emission incident; and
    - v. any corrective actions taken to minimize or eliminate the visible emissions.
- (4) For each day during which the permittee processes grain through the transferring/conveying and screening/cleaning operations which has not been treated with oil, the permittee shall maintain a record of the amount of grain processed.

## 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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(2) and d)(3):
  - a. for transferring/conveying operations:
    - i. all days during which any visible fugitive particulate emissions were observed from the totally enclosed transferring/conveying operations; and
    - ii. any corrective actions taken to eliminate the visible fugitive particulate emissions.
  - b. for the three-sided enclosure on truck grain dump pits #1,2,3,&4, the enclosure around screening/cleaning operations, and the railcar unloading operations:
    - i. all days during which any visible fugitive particulate emissions were observed (indentify the specific operation that experienced visible emissions) from the above operations as specified in d)(2); and
    - ii. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
  - c. for the Carter-Day/Donnelson dust collector and the MAC dust collector:
    - i. all days during which any visible particulate emissions were observed the stack serving the dust collector (indentify the specific dust collector that experienced visible emissions); and
    - ii. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to indentify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.
- (3) Pursuant to the New Source Performance Standards (NSPS), the permittee is hereby advised of the requirements to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. actual start-up date (within 15 days after such date); and
  - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

f) Testing Requirements

- (1) Compliance with the emission limitation in section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation

Combined stack emission limitations for emissions units P901 and P902 of 2.25lbs of PM10/hour and 0.41 ton of PM10/year for emissions from the Carter-Day/Donnelson dust collector. The stack emission limitations from the Carter-Day/Donnelson dust collector address combined emissions from truck grain receiving to truck dump pits #1,2,3,&4 and transferring/conveying for emissions unit P901 and transferring/conveying operations for emissions unit P902.

Applicable Compliance Method

The permittee shall demonstrate compliance by applying a 99% removal efficiency associated with a dust collector to an hourly maximum particulate matter (PM) loading rate to the dust collector of 225 lbs/hour. The PM loading rate was determined by the addition of the PM emissions generated from truck receiving operations for emissions unit P901 and transferring/conveying operations from emission units P901 and P902. The hourly PM loading rate from truck receiving operations for P901 (203 lbs/hr) was determined by multiplying a maximum throughput of 1,500 tons of grain/hour by an emission factor of 0.18 lbof PM/ton grain (AP-42 Table 9.9.1-1 [3/03]) and applying a 75% capture efficiency associated with the dust collector control system. The hourly PM loading rate from transferring/conveying\* operations for emission units P901 and P902 (22 lbs/hr) was determined by multiplying a maximum throughput of 900 tons of grain/hour by an emission factor of 0.061 lbof PM/ton grain (AP-42 Table 9.9.1-1 [3/03]), a factor of 2 to account for separate transferring/conveying operations and applying an 80% control efficiency for the use of mineral oil. If required, compliance shall be determined based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the Ohio EPA.

\*Transferring/conveying operations are totally enclosed.

The annual limitation was developed by applying a 99% removal efficiency associated with a dust collector to an annual maximum PM loading rate to the dust collector of 41.22 tons/year and dividing by 2000 lbs/ton. The PM loading rate was determined by the addition of the PM emissions generated from truck receiving operations for emissions unit P901 and transferring/conveying operations from emission units P901 and P902.

The annual PM loading rate from truck receiving operations for P901 (34.91 tons/yr) was determined by multiplying a maximum annual throughput of 517,200 tons by an emission factor of 0.18 lb of PM/ton grain (AP-42 Table 9.9.1-1 [3/03]) and applying a 75% capture efficiency associated with the dust collector control system. The annual PM loading rate from transferring/conveying\* operations for emission units P901 and P902 (6.31 tons/yr) was determined by multiplying a maximum annual throughput of 517,200 tons, an emission factor of 0.061 lb PM/ton grain (AP-42 Table 9.9.1-1 [3/03]), a factor of 2 to account for separate transferring/conveying operations and applying an 80% control efficiency for the use of mineral oil.

Therefore, provided compliance with capture and control requirements and the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation

Visible PE from the stack serving the Carter-Day/Donnelson dust collector shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

c. Emission Limitation

Fugitive emission limitation for truck grain receiving to truck dump pits #1,2,3,&4 of 3.82 tons of PM10/year.

Applicable Compliance Method

The annual fugitive PM10 limitation was developed by multiplying the maximum annual grain throughput of 517,200 tons by an emission factor of 0.059 lb of PM10/ton of grain (AP-42 Table 9.9.1-1 [3/03]), and applying a capture efficiency of 75% for a three-sided enclosure vented to a dust collector, then dividing by 2000 lbs/ton. Therefore, provided compliance with capture requirements and the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation

Visible fugitive particulate emission limitation of 5% opacity as a six-minute average from the enclosure serving truck grain receiving to truck dump pits #1,2,3,&4.

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation

Stack emission limitations for screening/cleaning operations of 0.20 pound of PM10/hour and 0.03 ton of PM10/year for emissions from the MAC dust collector

Applicable Compliance Method

The permittee shall demonstrate compliance by applying a 95% removal efficiency associated with a dust collector to an hourly maximum particulate matter (PM) loading rate of 4.05 lbs/hour. The hourly PM loading rate was determined by multiplying a maximum throughput of 300 tons of grain/hour by an emission factor of 0.075 lb of PM/ton grain (AP-42 Table 9.9.1-1 [3/03]) and applying an 80% control efficiency for use of mineral oil and a 90% capture efficiency associated with the dust collector control system. If required, compliance shall be determined based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of Ohio EPA.

The annual limitation was developed by multiplying the maximum annual grain throughput of 101,500 tons by an emission factor of 0.075 lb of PM/ton grain (AP-42 Table 9.9.1-1 [3/03]) and applying an 80% control efficiency for the use of mineral oil, a 90% capture efficiency, and 95% removal efficiency associated with a dust collector control system, then dividing by 2000 lbs/ton. Therefore, provided compliance with capture and control requirements and the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

f. Emission Limitation

Visible PE from the stack serving the MAC dust collector shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation

Fugitive emission limitation for screening/cleaning operations of 0.02 ton of PM<sub>10</sub>/year.

Applicable Compliance Method

The annual fugitive PM<sub>10</sub> limitation was developed by multiplying the maximum annual grain throughput of 101,500 tons by an emission factor of 0.019 lb of PM<sub>10</sub>/ton of grain (AP-42 Table 9.9.1-1 [3/03]), and applying an 80% control efficiency for the use of mineral oil, and a capture efficiency of 90% associated with a dust collector control system, then dividing by 2000 lbs/ton. Therefore, provided compliance with mineral oil control and capture requirements and the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

h. Emission Limitation

Visible fugitive particulate emissions from enclosed transferring/conveying operations shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

i. Emission Limitation

Fugitive emission limitation for railcar unloading operations of 0.04 ton of PM10/year

Applicable Compliance Method

The annual fugitive PM10 limitation was developed by multiplying the maximum annual grain throughput of 1,241 tons by an emission factor of 0.059 lb of PM10/ton of grain (AP-42 Table 9.9.1-1 [3/03]) then dividing by 2000 lbs/ton. Therefore, provided compliance the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

j. Emission Limitation

Visible fugitive particulate emission limitation of 5% opacity as a six-minute average from railcar unloading operations

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

k. Emission Limitation

The dust collector controlling the truck receiving operations and the transferring/conveying operations (the Carter-Day/Donnelson dust collector) shall achieve a maximum outlet concentration of 0.01 grain of PM10/dscf.

Applicable Compliance Method

Compliance with the maximum outlet concentration limitation shall be determined based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M[see Testing Requirements in f)(2)]. Alternative or equivalent methods can be used with the approval of Ohio EPA.

(2) 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 during the fall grain harvest season of 2011 for purposes of meeting the maximum source operating rate required in f)(2)d. below. Testing timeframe(s) specified may be amended or waived for cause upon prior request of, and written approval of Ohio EPA.
- b. The emission testing shall be conducted to demonstrate compliance with the maximum outlet concentration of 0.01 grain of PM10/dscf for the dust collector controlling truck receiving operations and transferring/conveying operations (the Carter-Day/Donnelson dust collector).
- c. The following test method(s) shall be employed to meet the testing requirements above:

PM10 - Methods 201/201A and 202 of 40 CFR Part 51, Appendix M;

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Northwest District Office. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Northwest District Office shall be permitted to witness the test(s), 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.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northwest District Office 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 Northwest District Office.

Future testing requirements shall be conducted in accordance with applicable rules, polices, etc. (i.e. Engineering Guide #16, OAC rule 3745-15-04, etc.). Testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

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.



3. F003

Operations, Property and/or Equipment Description:

Truck 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. b)(2)c.

(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 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.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(F), OAC rule 3745-31-05(A)(3) as effective 11/30/2001, OAC rule 3745-31-05(A)(3) as effective 12/1/2006, OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B).

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(2) which require control measures:

i. fugitive emission limitation for truck loading operations of 0.15 ton of PM10/year;

- ii. visible fugitive particulate emission limitation of 20% opacity as a three-minute average from three-sided enclosure serving truck loading operations.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

Voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 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 ORC changes effective August 3, 2006 (S.B. 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, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) 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) do not apply to the PM10 emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that does not involve an established NAAQS.
- e. 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).

- f. 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 following operational restriction has been included in this permit to represent the maximum potential throughput this emissions unit:
  - a. the maximum throughput for this emissions unit shall not exceed 207,406 tons of grain per year.
- (2) The following operational restrictions has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):
  - a. truck unloading operations shall be controlled by a three-sided enclosure; and
  - b. all grain processed through truck unloading operations shall have been treated with mineral oil. The mineral oil may be applied at any operation at the grain elevator preceding these operations (i.e., oil may be applied at grain receiving operations).

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the amount of material throughput for this emissions unit, in tons per month and total tons, to date, for the calendar year.
- (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 the three-sided enclosure controlling this emissions unit. The presence or absence of any visible fugitive 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)(2)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.

- (3) For each day during which the permittee processes grain through truck loading operations which has not been treated with oil, the permittee shall maintain a record of the amount of grain processed.

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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(2):
  - a. all days during which any visible fugitive particulate emissions were observed from the three-side enclosure controlling this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (3) Pursuant to the New Source Performance Standards (NSPS), the permittee is hereby advised of the requirements to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. actual start-up date (within 15 days after such date); and
  - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

f) Testing Requirements

- (1) Compliance with the emission limitation in section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation

Fugitive emission limitation for truck loading operations of 0.15 ton of PM10/year

Applicable Compliance Method

The annual fugitive PM10 limitation was developed by multiplying the maximum annual grain throughput of 207,406 tons by an emission factor of 0.029 lb of PM10/ton of grain (AP-42 Table 9.9.1-1 [3/03]), and applying the control efficiencies of 80% for use of mineral oil and 75% for a three-sided enclosure, then dividing by 2000 lbs/ton. Therefore, provided compliance with control requirements and the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation

Visible fugitive particulate emission limitation of 20% opacity as a three-minute average from three-sided enclosure serving truck loading operations.

Applicable Compliance Method

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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.



4. P902

Operations, Property and/or Equipment Description:

Railcar and Truck 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.

b)(2)c.

(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 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(F)	Emission limitations, opacity restrictions, operational restrictions, and control measures [see b)(2)a, c)(1), and c)(2)]
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-07(B)	See b)(2)e.
e.	OAC rule 3745-17-08	See b)(2)f.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(2) which require control measures:

i. combined stack emission limitations for emissions units P901 and P902 of 2.25 pounds of PM10/hour and 0.41 ton of PM10/year for emissions

from the Carter-Day/Donnelson dust collector. The stack emission limitations from the Carter-Day/Donnelson dust collector address truck grain receiving to truck dump pits #1,2,3,&4 and transferring/conveying for emissions unit P901 and transferring/conveying operations for emissions unit P902.\*;

- ii. fugitive emission limitation for railcar and truck loading operations of 0.72 ton of PM10/year;
- iii. visible fugitive particulate emission limitation of 20% opacity as a three-minute average when performing railcar loading operations;
- iv. visible fugitive particulate emission limitation of 20% opacity as a three-minute average when performing truck loading operations;
- v. nonvisible fugitive particulate emissions from the enclosed transferring and conveying operations.

\*All emissions of particulate matter from the dust collector are PM10.

- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

Voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 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 ORC changes effective August 3, 2006 (S.B. 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, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) 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) do not apply to the PM10 emissions from this air contaminant source

since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that does not involve an established NAAQS.
- e. The requirements specified by this rule are equivalent to or less stringent than the voluntary restrictions established under OAC rule 3745-31-05(F).
- f. 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).
- g. 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 following operational restrictions have been included in this permit to represent the maximum potential throughput for railcar and truck loading operations:
  - a. the maximum throughput for this emissions unit shall not exceed 309,795 tons of grain per year.
  - b. the maximum throughput for transferring/conveying for this emissions unit shall not exceed 517,200 tons of grain per year.
- (2) The following operational restrictions has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:
  - a. railcar and truck loading operations shall employ an adjustable loading spout;
  - b. all grain processed through truck unloading operations shall have been treated with mineral oil. The mineral oil may be applied at any operation at the grain elevator preceding these operations (i.e., oil may be applied at grain receiving operations); and
  - c. transferring/conveying operations shall be totally enclosed and be vented to a dust collector achieving a maximum outlet concentration of 0.01 grain of PM10/dscf (totally enclosed - 99% removal efficiency - 99% overall control);

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of material throughput for each of the following individual operations for this emissions unit, in tons per month and total tons, to date, for the calendar year:
  - a. throughput for railcar and truck loading; and
  - b. throughput for grain transferred/conveyed in this emission units.
- (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 the following for this emissions unit:
  - a. railcar and truck loading operations;
  - b. the totally enclosed transferring/conveying operations;

The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- c. for the totally enclosed transferring/conveying operations:
  - i. the location and color of the emissions;
  - ii. the total duration of any visible emission incident; and
  - iii. any corrective actions taken to eliminate the visible emissions.
- d. for railcar and truck loading operations:
  - i. the location and color of the emissions;
  - ii. whether the emissions are representative of normal operations;
  - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - iv. the total duration of any visible emission incident; and
  - v. 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)(2)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.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving the following for this emissions unit:
  - a. the Carter-Day/Donnelson dust collector controlling transferring/conveying operations.
- (4) For each day during which the permittee processes grain through the railcar and truck loading operations which has not been treated with oil, the permittee shall maintain a record of the amount of grain processed.

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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(2):
  - a. all days during which any visible fugitive particulate emissions were observed from the railcar and truck loading operations; and
  - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (3) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(2) and d)(3):
  - a. for transferring/conveying operations:
    - i. all days during which any visible fugitive particulate emissions were observed from the totally enclosed transferring/conveying operations; and
    - ii. any corrective actions taken to eliminate the visible fugitive particulate emissions.

- b. for railcar and truck loading operations:
  - i. all days during which any visible fugitive particulate emissions were observed; and
  - ii. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
- c. for the Carter-Day/Donnelson dust collector and the MAC dust collector:
  - i. all days during which any visible particulate emissions were observed the stack serving the dust collector (indentify the specific dust collector that experienced visible emissions); and
  - ii. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to indentify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (4) Pursuant to the New Source Performance Standards (NSPS), the permittee is hereby advised of the requirements to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. actual start-up date (within 15 days after such date); and
  - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

f) **Testing Requirements**

- (1) Compliance with the emission limitation in section b)(1) of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation  
Combined stack emission limitations for emissions units P901 and P902 of 2.25 pounds of PM10/hour and 0.41 ton of PM10/year for emissions from the Carter-Day/Donnelson dust collector. The stack emission limitations from the Carter-Day/Donnelson dust collector address combined emissions from truck grain receiving to truck dump pits #1,2,3,&4 and transferring/conveying for emissions unit P901 and transferring/conveying operations for emissions unit P902.

Applicable Compliance Method

The permittee shall demonstrate compliance by applying a 99% removal efficiency associated with a dust collector to an hourly maximum particulate matter (PM) loading rate to the dust collector of 225 lbs/hour. The PM loading rate was determined by the addition of the PM emissions generated from truck receiving operations for emissions unit P901 and transferring/conveying operations from emission units P901 and P902. The hourly PM loading rate from truck receiving operations for P901 (203 lbs/hr) was determined by multiplying a maximum throughput of 1,500 tons grain/hour by an emission factor of 0.18 lbs PM/ton grain (AP-42 Table 9.9.1-1 [3/03]) and applying a 75% capture efficiency associated with the dust collector control system. The hourly PM loading rate from transferring/conveying\* operations for emission units P901 and P902 (22 lbs/hr) was determined by multiplying a maximum throughput of 900 tons grain/hour by an emission factor of 0.061 lb PM/ton grain (AP-42 Table 9.9.1-1 [3/03]), a factor of 2 to account for separate transferring/conveying operations and applying an 80% control efficiency for the use of mineral oil. If required, compliance shall be determined based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the Ohio EPA.

\*Transferring/conveying operations are totally enclosed.

The annual limitation was developed by applying a 99% removal efficiency associated with a dust collector to an annual maximum PM loading rate to the dust collector of 41.22 tons/year and dividing by 2000 lbs/ton. The PM loading rate was determined by the adding the PM emissions generated from truck receiving operations for emissions unit P901 and transferring/conveying operations from emission units P901 and P902.

The annual PM loading rate from truck receiving operations for P901 (34.91 tons/yr) was determined by multiplying a maximum annual throughput of 517,200 tons by an emission factor of 0.18 lbs PM/ton grain (AP-42 Table 9.9.1-1 [3/03]) and applying a 75% capture efficiency associated with the dust collector control system. The annual PM loading rate from transferring/conveying\* operations for emission units P901 and P902 (6.31 tons/yr) was determined by multiplying a maximum annual throughput of 517,200 tons, an emission factor of 0.061 lb PM/ton grain (AP-42 Table 9.9.1-1 [3/03]), a factor of 2 to account for separate transferring/conveying operations and applying an 80% control efficiency for the use of mineral oil.

Therefore, provided compliance with capture and control requirements and the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation

The dust collector controlling transferring/conveying operations (the Carter-Day/Donnelson dust collector) shall achieve a maximum outlet concentration of 0.01 grain of PM10/dscf.

Compliance with the maximum outlet concentration limitation shall be determined based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M[see Testing Requirements in f)(2)]. Alternative or equivalent methods can be used with the approval of Ohio EPA.

c. Emission Limitation

Fugitive emission limitation for railcar and truck loading operations of 0.72 ton of PM10/year.

Applicable Compliance Method

The annual fugitive PM10 limitation was developed by multiplying the maximum annual grain throughput of 309,795 tons by an emission factor of 0.029 lb of PM10/ton of grain (AP-42 Table 9.9.1-1 [3/03]), and applying an 80% control efficiency for use of mineral oil and a 20% control efficiency for the use of adjustable spouts, then dividing by 2000 lbs/ton. Therefore, provided compliance with mineral oil use and the annual grain throughput is shown, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation

Visible fugitive particulate emission limitation of 20% opacity as a three-minute average when performing railcar loading operations.

Applicable Compliance Method

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

e. Emission Limitation

Visible fugitive particulate emission limitation of 20% opacity as a three-minute average when performing truck loading operations.

Applicable Compliance Method

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

f. Emission Limitation

No visible fugitive particulate emissions from enclosed transferring/conveying operations.

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22.

- (2) 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 to demonstrate compliance with the maximum outlet concentration of 0.01 grain of PM10/dscf for the dust collector controlling transferring/conveying operations (the Carter-Day/Donnelson dust collector). See the testing requirements in section f)(2) of emissions unit P901.

g) **Miscellaneous Requirements**

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.