



Environmental Protection Agency

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

5/9/2011

Stacy Schmidt  
Andersons Marathon Ethanol LLC  
PO Box 119  
Maumee, OH 43537

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0819750245  
Permit Number: P0107359  
Permit Type: OAC Chapter 3745-31 Modification  
County: Darke

Certified Mail

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

Dear Permit Holder:

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

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

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

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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: RAPCA





## Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0819750245
Facility Name:	Andersons Marathon Ethanol LLC
Facility Description:	Ethanol Fuel Production
Facility Address:	5278 SEBRING WARNER RD Greenville, OH 45331 Darke County
Permit #:	P0107359, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Greenville Daily Advocate on 04/06/2011. The comment period ended on 05/06/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**No Comments Received**





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Andersons Marathon Ethanol LLC**

Facility ID: 0819750245  
Permit Number: P0107359  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 5/9/2011  
Effective: 5/9/2011  
Expiration: 4/29/2014





Division of Air Pollution Control
Permit-to-Install and Operate
for
Andersons Marathon Ethanol LLC

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## Authorization

Facility ID: 0819750245

Application Number(s): A0040210, A0041086

Permit Number: P0107359

Permit Description: Modification of 1 existing baghouse and installation of 2 new bin vent filters and 2 new baghouses for Grain Receiving, Handling and Storage (P901), increase in natural gas usage limitation for Grain Dryer (F002), addition of a new loading arm and E-85 blending capabilities for the Loading Rack (J001), additional option of natural gasoline denaturant (tanks T003 through T006) and increased throughput for the 190-proof ethanol tank (T001) to account for recycling of product. Facility is an ethanol production facility.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$6,800.00

Issue Date: 5/9/2011

Effective Date: 5/9/2011

Expiration Date: 4/29/2014

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Andersons Marathon Ethanol LLC  
5278 SEBRING WARNER RD  
Greenville, OH 45331

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

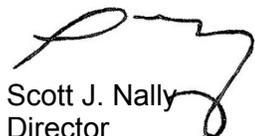
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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: P0107359

Permit Description: Modification of 1 existing baghouse and installation of 2 new bin vent filters and 2 new baghouses for Grain Receiving, Handling and Storage (P901), increase in natural gas usage limitation for Grain Dryer (F002), addition of a new loading arm and E-85 blending capabilities for the Loading Rack (J001), additional option of natural gasoline denaturant (tanks T003 through T006) and increased throughput for the 190-proof ethanol tank (T001) to account for recycling of product. Facility is an ethanol production facility.

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

- Emissions Unit ID: F002**  
Company Equipment ID: Grain Dryer  
Superseded Permit Number: P0104717  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: J001**  
Company Equipment ID: Loadout Rack  
Superseded Permit Number: P0104662  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P901**  
Company Equipment ID: Grain Receiving (Truck and Rail), Handling and Storage  
Superseded Permit Number: P0104169  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T003**  
Company Equipment ID: Gasoline Denaturant Tank  
Superseded Permit Number: P0104717  
General Permit Category and Type: Not Applicable

**Group Name: Ethanol Tanks (except T002)**

<b>Emissions Unit ID:</b>	<b>T001</b>
Company Equipment ID:	190 Proof Ethanol Tank
Superseded Permit Number:	P0104717
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T004</b>
Company Equipment ID:	Denatured Ethanol Tank #1
Superseded Permit Number:	P0104717
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T005</b>
Company Equipment ID:	Denatured Ethanol Tank #2
Superseded Permit Number:	P0104717
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T006</b>
Company Equipment ID:	Denatured Ethanol Tank #3
Superseded Permit Number:	P0104717
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 Regional Air Pollution Control Agency 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**

**Final Permit-to-Install and Operate**

Andersons Marathon Ethanol LLC

**Permit Number:** P0107359

**Facility ID:** 0819750245

**Effective Date:** 5/9/2011

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, GrainDryer**

**Operations, Property and/or Equipment Description:**

65 mmBtu/hr Column Grain Dryer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific 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.	ORC 3704.03(T) (P0107359)	Particulate emissions (PE) from this emissions unit shall not exceed 0.091 lbs/ton processed.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107359)	Carbon monoxide (CO) emissions from this emissions unit shall not exceed 5.46 lbs/hr and 5.04 tons per rolling 12-month period.  Nitrogen oxide (NO <sub>x</sub> ) emissions from this emissions unit shall not exceed 6.5 lbs/hr and 6.00 tons per rolling 12-month period.  Emissions of particulate matter less than 10 microns in diameter (PM <sub>10</sub> ) from this emissions unit shall not exceed 4.19 l/hr and 5.08 tons per rolling 12-month period.  See b)(2)a.

**Final Permit-to-Install and Operate**

Andersons Marathon Ethanol LLC

**Permit Number:** P0107359

**Facility ID:** 0819750245

**Effective Date:** 5/9/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E), as effective 12/01/06 (synthetic minor to avoid BAT) (P0107359)	CO emissions from this emissions unit shall not exceed 5.04 tons per rolling 12-month period.  NO <sub>x</sub> emissions from this emissions unit shall not exceed 6.00 tons per rolling 12-month period.  PM <sub>10</sub> emissions from this emissions unit shall not exceed 5.08 tons per rolling 12-month period.  See b)(2)b.
f.	OAC rule 3745-17-07(B)	See b)(2)c.
g.	OAC rule 3745-17-08(B)	See b)(2)d.
h.	OAC rule 3745-18-06	See b)(2)e.
i.	40 CFR Part 60, Subpart DD	See b)(2)f.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. 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.

Permit to Install and Operate P0107359 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of

avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. The annual grain throughput rate for this emissions unit shall not exceed 420,000 tons per year, based upon a rolling, 12-month summation of the grain throughput rates.
  - ii. The annual natural gas usage in this emissions unit shall not exceed 120 million cubic feet (mmcf) per year, based upon a rolling, 12-month summation of the natural gas usage rates.
  - iii. CO emissions from this emissions unit shall not exceed 5.04 tons per rolling 12-month period.
  - iv. NO<sub>x</sub> emissions from this emissions unit shall not exceed 6.00 tons per rolling 12-month period.
  - v. PM<sub>10</sub> emissions from this emissions unit shall not exceed 5.08 tons per rolling 12-month period.
- c. 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).
  - d. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
  - e. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).
  - f. Per 40 CFR 60.302(a), no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch). This grain dryer F002 does not have column plate perforations exceeding this size; therefore, the visible emissions limitation does not apply.
  - g. This emissions unit is permitted at its potential to emit, as defined in OAC rule 3745-31-01, for all pollutants.
  - h. This emissions unit consists of the grain dryer only. Grain material handling operations with the grain dryer, which are controlled by a baghouse venting to Stack S-22, are included with emissions unit P901.
- c) Operational Restrictions
- (1) The annual grain throughput rate for this emissions unit shall not exceed 420,000 tons per year, based upon a rolling, 12-month summation of the grain throughput rates.
  - (2) The annual natural gas usage in this emissions unit shall not exceed 120 mmcf per year, based upon a rolling, 12-month summation of the natural gas usage rates.

(3) The permittee shall only burn natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the grain throughput rate, in tons;
- b. the natural gas usage, in mmcf;
- c. the PM<sub>10</sub>, NO<sub>x</sub> and CO emissions, in tons;
- d. the rolling, 12-month summation of the grain throughput, in tons;
- e. the rolling, 12-month summation of the natural gas usage, in mmcf; and
- f. the rolling, 12-month summation of PM<sub>10</sub>, NO<sub>x</sub> and CO emissions, in tons.

(2) For each day during which the permittee burns a fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

(3) The permittee shall submit deviation (excursion) reports to the Regional Air Pollution Control Agency that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

a. Emissions Limitation:

PE from this emissions unit shall not exceed 0.091 lbs/ton processed.

Applicable Compliance Method:

Compliance shall be determined using AP-42 Table 1.4-2 (July 1998) for the combustion emissions, the grain dryer manufacturer-provided emissions factor for the grain emissions and inputs representing the Potential To Emit (PTE), as follows:

Emissions = (Combustion Emissions + Grain Emissions) / Maximum Grain Processing Rate

Combustion Emissions = (maximum dryer heat input) \* (emission factor) / (Fuel Heat Content)

Combustion Emissions = (65 mmBtu/hr) \* (7.6 lb/mmcf) / (1,000 mmBtu/mmcf)

Combustion Emissions = 0.494 lb/hr

Grain Emissions = Emission Factor

Grain Emissions = 14.784 lbs/hr

Maximum Grain Processing Rate = 168 tons/hr

Emissions = (0.494 lb/hr + 14.784 lb/hr) / 168 tons/hr = 0.091 lbs/ton processed

b. Emissions Limitation:

CO emissions from this emissions unit shall not exceed 5.46 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) and inputs representing the Potential To Emit (PTE), as follows:

Emissions = (maximum dryer heat input) \* (emission factor) / (Fuel Heat Content)

Emissions = (65 mmBtu/hr) \* (84 lb/mmcf) / (1,000 mmBtu/mmcf)

Emissions = 5.46 lbs/hr

c. Emissions Limitation:

CO emissions from this emissions unit shall not exceed 5.04 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(1) and shall be calculated using AP-42 Table 1.4-1 (July 1998) as follows:

Emissions = (fuel usage) \* (emission factor) \* (Fuel Heat Content)

Emissions = (fuel usage in mmcf per rolling 12-month period) \* (84 lb/mmcf) / (2,000 lbs/ton)

d. Emissions Limitation:

NO<sub>x</sub> emissions from this emissions unit shall not exceed 6.5 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) and inputs representing the Potential To Emit (PTE), as follows:

Emissions = (maximum dryer heat input) \* (emission factor) / (Fuel Heat Content)

Emissions = (65 mmBtu/hr) \* (100 lb/mmcf) / (1,000 mmBtu/mmcf)

Emissions = 6.5 lbs/hr

e. Emissions Limitation:

NO<sub>x</sub> emissions from this emissions unit shall not exceed 6.00 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(1) and shall be calculated using AP-42 Table 1.4-1 (July 1998) as follows:

Emissions = (fuel usage) \* (emission factor) \* (Fuel Heat Content)

Emissions = (fuel usage in mmcf per rolling 12-month period) \* (100 lb/mmcf) / (2,000 lbs/ton)

f. Emissions Limitation:

PM<sub>10</sub> emissions from this emissions unit shall not exceed 4.19 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined using AP-42 Table 1.4-2 (July 1998) for the combustion emissions, the grain dryer manufacturer-provided emissions factor for the grain emissions, AP-42 Table 9.9.1-1 (March 2003) for the PM<sub>10</sub> fraction and inputs representing the Potential to Emit (PTE), as follows:

Emissions = Combustion Emissions + Grain Emissions

Combustion Emissions = (maximum dryer heat input) \* (emission factor) / (Fuel Heat Content)

Combustion Emissions = (65 mmBtu/hr) \* (7.6 lb/mmcf) / (1,000 mmBtu/mmcf)

Combustion Emissions = 0.494 lb/hr

Grain Emissions = (PE emission factor) \* (AP-42 PM<sub>10</sub> emission factor / AP-42 PE emission factor)

Grain Emissions = (14.78 lbs PE/hr) \* (0.055 lb PM<sub>10</sub>/ton / 0.22 lb PE/ton)

Grain Emissions = 3.7 lbs/hr

Emissions = 0.494 + 3.7 = 4.19 lbs/hr

g. Emissions Limitation:

PM<sub>10</sub> emissions from this emissions unit shall not exceed 5.08 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(1) and shall be calculated using AP-42 Table 1.4-2 (July 1998) for the combustion emissions, the grain dryer manufacturer-provided emissions factor for the grain emissions, and AP-42 Table 9.9.1-1 (March 2003) for the PM<sub>10</sub> fraction, as follows:

Emissions = Combustion Emissions + Grain Emissions

Combustion Emissions = (fuel usage) \* (emission factor) \* (Fuel Heat Content)

Combustion Emissions = (fuel usage in mmcf per rolling 12-month period) \* (7.6 lb/mmcf) / (2,000 lbs/ton)

Grain Emissions = (PE emission factor) \* (AP-42 PM<sub>10</sub> emission factor / AP-42 PE emission factor) \* (grain throughput) / (maximum grain dryer capacity) / (2000 lbs/ton)

Grain Emissions = (14.78 lbs PE/hr) \* (0.055 lb PM<sub>10</sub>/ton / 0.22 lb PE/ton) \* (grain throughput in tons grain per rolling 12-month period) / (168 tons grain/hr) / (2000 lbs/ton)

g) Miscellaneous Requirements

(1) None.

**2. J001, Loadout Rack**

**Operations, Property and/or Equipment Description:**

Denatured Ethanol Loading Rack (Three Truck Loading Arms and Two Railcar Loading Arms)  
 Controlled with a Flare

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

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

a. b)(1)(e), d)(3), d)(4) and e)(3).

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

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.	ORC 3704.03(T) (P0107359)  OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 14.39 tons per rolling 12-month period.  See b)(2)b through b)(2)f and c)(2).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107359)	Carbon monoxide (CO) emissions from the flare shall not exceed 9.11 lbs/hr and 6.16 tons per rolling 12-month period.  Nitrogen oxide (NO <sub>x</sub> ) emissions from the flare shall not exceed 5.47 lbs/hr and 3.72 tons per rolling 12-month period.  See b)(2)g.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	CO emissions from the flare shall not exceed 6.16 tons per rolling 12-month period.  NO <sub>x</sub> emissions from the flare shall not exceed 3.72 tons per rolling 12-month period.
d.	OAC rule 3745-31-05(E), as effective 12/1/06 (synthetic minor to avoid BAT)	CO emissions from the flare shall not exceed 6.16 tons per rolling 12-month period.  NO <sub>x</sub> emissions from the flare shall not exceed 3.72 tons per rolling 12-month period.  See b)(2)h.
e.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(3), d)(4) and e)(3).

(2) Additional Terms and Conditions

- a. The rolling 12-month allowable emission rates are based on the annual production of 132,000,000 gallons of denatured ethanol.
- b. During any transfer of material through the loading rack, the vapors displaced from the delivery vessel shall be vented to a flare.
- c. The loading rack shall utilize top submerged filling or bottom filling for the transfer of materials.
- d. All material loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.
- e. A vapor tight lid shall be placed onto the truck's fill point before loading operations.
- f. The vapor head space in the truck's tank shall be evacuated through a solid vapor line then routed to the flare.
- g. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that

BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- h. 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.

Permit to Install and Operate P0107359 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3)):

- i. The annual amount of denatured ethanol and E-85 processed through this emissions unit shall not exceed 132,000,000 gallons, based upon a rolling, 12-month summation of the denatured ethanol and E-85 production.
- ii. CO emissions from the flare shall not exceed 6.16 tons per rolling 12-month period.
- iii. NO<sub>x</sub> emissions from the flare shall not exceed 3.72 tons per rolling 12-month period.
- i. This emissions unit is permitted at its potential to emit, as defined in OAC rule 3745-31-01, for all pollutants.

c) Operational Restrictions

- (1) The annual amount of denatured ethanol and E-85 processed through this emissions unit shall not exceed 132,000,000 gallons, based upon a rolling, 12-month summation of the denatured ethanol and E-85 production.
- (2) The permittee shall comply with the following restrictions on the flare controlling this emissions unit:
  - a. the closed vent system shall be operated at all times when emissions may be vented to it;
  - b. the flare shall be operated with a pilot flame. The flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame;

- c. the net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be 300 Btu/scf or greater;
- d. the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (DD)(10)(d) of rule 3745-21-09 of the Administrative Code; and,
- e. the permittee shall ensure the flare is operated and maintained in conformance with its design.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of denatured ethanol and E-85 loaded into railcars;
  - b. the amount of denatured ethanol and E-85 loaded into trucks;
  - c. the amount of denatured ethanol and E-85 processed [i.e., d)(1)a + d)(1)b];
  - d. the NO<sub>x</sub>, CO and VOC emissions, in tons;
  - e. the rolling, 12-month summation of the denatured ethanol production; and
  - f. the rolling, 12-month summation of NO<sub>x</sub>, CO and VOC emissions, in tons.
- (2) The permittee shall comply with the following monitoring and recordkeeping requirements on the flare controlling this emissions unit:
  - a. the flare shall be monitored with a thermocouple or any other equivalent device to detect the presence of a pilot flame;
  - b. the permittee shall maintain and operate a flow indicator which provides a record of the vent stream flow to the flare;
  - c. the permittee shall maintain records of the following:
    - i. flow rate to the flare, including records of all periods when the closed vent stream is diverted from the flare or when there is no flow rate;
    - ii. records of all periods when the flare pilot flame is absent;
    - iii. periods when the closed vent system and flare are not operated as designed; and
    - iv. dates of start-ups and shutdowns of the closed vent system and flare; and
  - d. the permittee shall record all periods of time during which there was no pilot flame or the flare was inoperable when the emissions unit was in operation.

- (3) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 1.35

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 50.36 (entire facility)

MAGLC (µg/m<sup>3</sup>): 4,486

Pollutant: Xylene

TLV (mg/m<sup>3</sup>): 434.19

Maximum Hourly Emission Rate (lbs/hr): 1.08

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 40.29 (entire facility)

MAGLC (µg/m<sup>3</sup>): 10,338

Pollutant: Methyl tert-Butyl Ether (MTBE)

TLV (mg/m<sup>3</sup>): 180.31

Maximum Hourly Emission Rate (lbs/hr): 0.67

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 25.18 (entire facility)

MAGLC (µg/m<sup>3</sup>): 4,293

- (4) The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes

that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month denatured ethanol and E-85 processing limitation;
  - ii. all exceedances of the rolling, 12-month NO<sub>x</sub>, CO and VOC emissions limitations;
  - iii. all exceedances of all monitored parameters (i.e., thermocouple or equivalent device and vent stream flow indicator);
  - iv. all periods of time when the closed vent system stream is diverted from system control devices;
  - v. all periods of time when the flare was not operational, including all periods of time during which the pilot flame on the flare is not functioning properly; and
  - vi. all periods of time when required monitoring data was not collected.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit annual reports which specify the total NO<sub>x</sub>, CO and VOC emissions from this emissions unit in tons per rolling 12-month period for the previous calendar year. This report shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.
- (3) The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 14.39 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(1) and shall be calculated using the loading loss (LL) calculations from AP-42 Section 5.2 (1/95). Trucks are a non-dedicated fleet and may transport gasoline from the loading rack from time to time; therefore, the vapor headspace of the trucks is assumed to be saturated with gasoline vapors. The vapor headspace of the railcars is assumed to be saturated with ethanol vapors. Compliance shall be calculated as follows:

$$LL \text{ (lb VOC/1000 gallons)} = [12.46 * (\text{SPM} / T)]$$

where=

S= saturation factor (1.0 for vapor balance, truck; and 0.6 for submerged load w/o vapor balance, rail)

P= true vapor pressure of liquid loaded (4.55 for gasoline, truck; and 0.63 for denatured ethanol, rail)

M= molecular weight of vapors (66 for gasoline, truck; and 49.8 for denatured ethanol, rail)

T= temperature of bulk liquid (avg. of 51.34 °F + 460 = 511 °R)

Using the values in the above equations, the VOC factors were used to calculate emissions as follows:

LL = 7.32 lb VOC/1000 gallons to truck and

LL = 0.46 lb VOC/1000 gallons to rail

Capture efficiency = 99%

Control efficiency of flare = 98%

Compliance with the 12-month rolling allowable emissions rate for VOCs will be determined as follows:

$LL_{total} = \text{maximum of } LL_{truck} \text{ and } LL_{rail}$

$LL_{truck} = \{[(7.32 * 0.99 * (1 - 0.98)) + (7.32 * (1 - 0.99))]\} / 1000 \text{ gal} * (\text{quantity of denatured ethanol and E-85 loaded into trucks in gal per rolling 12-month period}) / 2,000 \text{ lbs/ton}$

$LL_{rail} = \{[(0.46 * 0.99 * (1 - 0.98)) + (0.46 * (1 - 0.99))]\} / 1000 \text{ gal} * (\text{quantity of denatured ethanol and E-85 loaded into railcars in gal per rolling 12-month period}) / 2,000 \text{ lbs/ton}$

b. Emissions Limitation:

CO emissions from the flare shall not exceed 9.11 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) for the pilot flame, manufacturer-provided emissions factor for the flare and inputs representing the Potential To Emit (PTE), as follows:

Emissions = Flare Emissions + Pilot Light Emissions

Flare Emissions = (maximum flare design heat release) \* (emission factor)

$$\text{Flare Emissions} = (18.2 \text{ mmBtu/hr}) * (0.5 \text{ lb/mmBtu}) = 9.10 \text{ lbs/hr}$$

$$\text{Pilot Emissions} = (\text{maximum heat input}) * (\text{emission factor})$$

$$\text{Pilot Emissions} = (0.1 \text{ mmBtu/hr}) * (0.084 \text{ lb/mmBtu}) = 0.01 \text{ lb/hr}$$

$$\text{Emissions} = 9.10 + 0.01 = 9.11 \text{ lbs/hr}$$

No testing for this emissions limitation is specifically required by this permit but, if required by Ohio EPA, may be requested pursuant to OAC rule 3745-15-04(A).

c. Emissions Limitation:

CO emissions from the flare shall not exceed 6.16 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(1) and shall be calculated using AP-42 Table 1.4-1 (July 1998) for the pilot flame and the manufacturer-provided emissions factor for the flare, as follows:

$$\text{Emissions} = \text{Flare Emissions from Truck Loading} + \text{Flare Emissions from Railcar Loading} + \text{Pilot Light Emissions}$$

$$\text{Emissions}_{\text{Truck}} = (1389 \text{ Btu/ft}^3 / 7.48 \text{ gal/ft}^3) (0.5 \text{ lb/mmBtu}) * (\text{quantity of denatured ethanol and E-85 loaded into trucks in gal per rolling 12-month period}) / (1,000,000 \text{ Btu/mmBtu}) / (2000 \text{ lbs/ton})$$

$$\text{Emissions}_{\text{Railcar}} = (360 \text{ Btu/ft}^3 / 7.48 \text{ gal/ft}^3) (0.5 \text{ lb/mmBtu}) * (\text{quantity of denatured ethanol and E-85 loaded into railcars in gal per rolling 12-month period}) / (1,000,000 \text{ Btu/mmBtu}) / (2000 \text{ lbs/ton})$$

$$\text{Pilot Emissions} = (\text{maximum heat input}) * (\text{emission factor}) * (\text{operating hours}) / (2000 \text{ lbs/ton})$$

$$\text{Pilot Emissions} = (0.1 \text{ mmBtu/hr}) * (0.084 \text{ lb/mmBtu}) * (8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton})$$

d. Emissions Limitation:

NO<sub>x</sub> emissions from the flare shall not exceed 5.47 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) for the pilot flame, manufacturer-provided emissions factor for the flare and inputs representing the Potential To Emit (PTE), as follows:

$$\text{Emissions} = \text{Flare Emissions} + \text{Pilot Light Emissions}$$

Flare Emissions = (maximum flare design heat release) \* (emission factor)

Flare Emissions = (18.2 mmBtu/hr) \* (0.3 lb/mmBtu) = 5.46 lbs/hr

Pilot Emissions = (maximum heat input) \* (emission factor)

Pilot Emissions = (0.1 mmBtu/hr) \* (0.1 lb/mmBtu) = 0.01 lb/hr

Emissions = 5.46 + 0.01 = 5.47 lbs/hr

No testing for this emissions limitation is specifically required by this permit but, if required by Ohio EPA, may be requested pursuant to OAC rule 3745-15-04(A).

e. Emissions Limitation:

NO<sub>x</sub> emissions from the flare shall not exceed 3.72 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(1) and shall be calculated using AP-42 Table 1.4-1 (July 1998) for the pilot flame and the manufacturer-provided emissions factor for the flare, as follows:

Emissions = Flare Emissions from Truck Loading + Flare Emissions from Railcar Loading + Pilot Light Emissions

$Emissions_{Truck} = (1389 \text{ Btu/ft}^3 / 7.48 \text{ gal/ft}^3) (0.3 \text{ lb/mmBtu}) * (\text{quantity of denatured ethanol and E-85 loaded into trucks in gal per rolling 12-month period}) / (1,000,000 \text{ Btu/mmBtu}) / (2000 \text{ lbs/ton})$

$Emissions_{Railcar} = (360 \text{ Btu/ft}^3 / 7.48 \text{ gal/ft}^3) (0.3 \text{ lb/mmBtu}) * (\text{quantity of denatured ethanol and E-85 loaded into railcars in gal per rolling 12-month period}) / (1,000,000 \text{ Btu/mmBtu}) / (2000 \text{ lbs/ton})$

Pilot Emissions = (maximum heat input) \* (emission factor) \* (operating hours) / (2000 lbs/ton)

Pilot Emissions = (0.1 mmBtu/hr) \* (0.1 lb/mmBtu) \* (8760 hrs/yr) / (2000 lbs/ton)

g) Miscellaneous Requirements

(1) None.

**3. P901, Grain Receiving (Truck and Rail), Handling and Storage**

**Operations, Property and/or Equipment Description:**

Grain Receiving (Truck) and Grain Handling Prior to Corn Storage controlled by a baghouse (Stack S-20); Grain Receiving (Rail) controlled by a baghouse (Stack S-20A); Grain Material Handling associated with the Grain Dryer controlled by a baghouse (Stack S-22); Scalper, Grinding/Day Bin and Roof Elevator Leg controlled by a baghouse (Stack S-26); Ground Corn Handling controlled by a baghouse (Stack S-26A); and Corn Storage in Two Concrete Bins controlled by two bin vent filters

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

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

a. None.

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

a. b)(1)g., d)(5), e)(1), e)(5), and f)(1)d.

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.	ORC 3704.03(T) (P0107359)	Each baghouse and bin vent filter for this emissions unit shall achieve an outlet emission rate of not greater than 0.005 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases (gr/dscf).  Visible PE of fugitive dust from grain handling operations shall not exceed 0% opacity.  Visible PE of fugitive dust from truck and railcar unloading shall not exceed 5% opacity.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1);	Visible PE from the stacks serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	PE from the stacks serving this emissions unit shall not exceed 7.95 lbs/hr.
d.	40 CFR 60 Subpart DD	The emissions limitation specified by this rule is equivalent to the emissions limitations established pursuant to ORC 3704.03(T).
e.	OAC rule 3745-17-07(B)	See b)(2)b.
f.	OAC rule 3745-17-08(B)	See b)(2)c.
g.	OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	PE and PM <sub>10</sub> emissions from the stacks serving this emissions unit shall not exceed 12.71 tons per rolling 12-month period.

(2) Additional Terms and Conditions

- a. The rolling 12-month allowable emission rates are based on the annual production of 132,000,000 gallons of denatured ethanol.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- d. This emissions unit is permitted at its potential to emit, as defined in OAC rule 3745-31-01, for all pollutants.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse and bin vent filter when the controlled emissions unit is in operation, including periods of startup and

shutdown. The permittee shall record the pressure drop across each baghouse and bin vent filter on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The acceptable pressure drop range shall be based upon the manufacturer's specifications, which is 0.25 to 8 inches of water for each of the seven (7) baghouses/bin vent filters serving this emissions unit.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across each baghouse and bin vent filter is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with

the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) 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 stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under d)(2)d above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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 fugitive emissions from the truck and railcar unloading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the grain handling operations. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (5) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The operating hours for each month;
  - b. The PE and PM<sub>10</sub> emissions exhausted from the stacks serving this emissions unit, in tons; and
  - c. The rolling, 12-months summation of PE and PM<sub>10</sub> emissions exhausted from the stacks serving this emissions unit, in tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation or exceedance of a federally enforceable requirement contained in this permit to include:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across any of the baghouses/bin vent filters were outside of the acceptable range;
  - b. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month PE and PM<sub>10</sub> emissions limitations.
  - c. an identification of each incident of deviation described in e)(1)a or e)(1)b where a prompt investigation was not conducted;
  - d. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
  - e. an identification of each incident of deviation described in e)(1)b where prompt corrective action, that would bring the emissions unit into compliance with any federally enforceable emission limitation(s), operational restriction(s), and/or

other control device operating parameter limitation(s), was determined to be necessary and was not taken;

- f. an identification of each incident of deviation described in e)(1)a or e)(1)b where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- g. the probable cause of each deviation;
- h. any corrective actions that were taken to remedy the deviations or prevent future deviations; and
- i. the level or magnitude of excursion above the acceptable restricted limitation(s), operational restriction(s), and/or control device parameter limitation(s) and the duration (number of hours and date) of each deviation.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:
  - a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(3) above:
  - a. all days during which any visible fugitive particulate emissions were observed from the truck and railcar unloading; and
  - b. any corrective actions taken to eliminate the visible fugitive particulate emissions.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(4) above:
  - a. all days during which any visible fugitive particulate emissions were observed from the grain handling operations; and

- b. any corrective actions taken to eliminate the visible fugitive particulate emissions.
- (5) The permittee shall submit annual reports which specify the total PE and PM<sub>10</sub> emissions in tons per rolling 12-month period from this emissions unit for the previous calendar year. This report shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.
  - (6) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitation

Each baghouse and bin vent filter for this emissions unit shall achieve an outlet emission rate of not greater than 0.005 gr PE /dscf.

Applicable Compliance Method

For Stacks S-20 and S-26, the baghouse outlet PE concentration shall be determined through the performance testing as described in f)(2).

For Stacks S-20A, S-22, S-26A and the two concrete bin vent filters, if required, compliance may be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
    - b. Emission Limitations

Visible PE from the baghouse and bin vent filter stacks serving this emissions unit shall not exceed 0% opacity.

Visible PE of fugitive dust from grain handling operations shall not exceed 0% opacity.

Visible PE of fugitive dust from truck and railcar unloading shall not exceed 5% opacity.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

c. Emission Limitation

PE from the stacks serving this emissions unit shall not exceed 7.95 lbs/hr.

Applicable Compliance Method

Compliance shall be calculated using the exhaust grain loadings of the baghouses and bin vent filters and inputs representing the Potential To Emit (PTE), as follows:

Emissions = S-20 Baghouse Emissions + S-20A Baghouse Emissions + S-22 Baghouse Emissions + S-26 Baghouse Emissions + S-26A Baghouse Emissions + Concrete Bin Vent Filter #1 Emissions + Concrete Bin Vent Filter #2 Emissions

Baghouse Emissions = (exhaust PE concentration) \* (exhaust flow rate) \* (60 min/hr) / (7000 gr/lb)

S-20 Emissions = (PE in gr/dscf from most recent test) \* (48,000 dscf/min) \* (60 min/hr) / (7000 gr/lb)

S-20A Emissions = (0.005 gr/dscf) \* (7,500 dscf/min) \* (60 min/hr) / (7000 gr/lb)

S-22 Emissions = (PE in gr/dscf from most recent test) \* (2,750 dscf/min) \* (60 min/hr) / (7000 gr/lb)

S-26 Emissions = (PE in gr/dscf from most recent test) \* (5,950 dscf/min) \* (60 min/hr) / (7000 gr/lb)

S-26A Emissions = (0.005 gr/dscf) \* (1,100 dscf/min) \* (60 min/hr) / (7000 gr/lb)

Concrete Bin Vent Filter #1 Emissions = (0.005 gr/dscf) \* (1,200 dscf/min) \* (60 min/hr) / (7000 gr/lb)

Concrete Bin Vent Filter #2 Emissions = (0.005 gr/dscf) \* (1,200 dscf/min) \* (60 min/hr) / (7000 gr/lb)

For Stacks S-20 and S-26, the baghouse outlet PE concentration shall be determined through the performance testing as described in f)(2). For S-20, the

current baghouse outlet PE concentration is 0.002 gr/dscf from emissions testing

conducted on 12/08. For S-26, the current baghouse outlet PE concentration is 0.0016 gr/dscf from emissions testing conducted on 12/08.

For Stacks S-20A, S-22, S-26A and the two concrete bin vent filters, if required, compliance may be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(10). For S-22, the current baghouse outlet PE concentration is 0.0016 gr/dscf from emissions testing conducted on 12/08.

d. Emission Limitations

PE and PM<sub>10</sub> emissions from the baghouses serving this emissions unit shall not exceed 12.71 tons per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements in d)(5) and shall be calculated using the exhaust grain loadings of the baghouses and bin vent filters as follows:

Emissions = S-20 Baghouse Emissions + S-20A Baghouse Emissions + S-22 Baghouse Emissions + S-26 Baghouse Emissions + S-26A Baghouse Emissions + Concrete Bin Vent Filter #1 Emissions + Concrete Bin Vent Filter #2 Emissions

Baghouse Emissions = (exhaust PE concentration) \* (exhaust flow rate) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

S-20 Emissions = (PE in gr/dscf from most recent test) \* (48,000 dscf/min) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

S-20A Emissions = (0.005 gr/dscf) \* (7,500 dscf/min) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

S-22 Emissions = (PE in gr/dscf from most recent test) \* (2,750 dscf/min) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

S-26 Emissions = (PE in gr/dscf from most recent test) \* (5,950 dscf/min) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

S-26A Emissions = (0.005 gr/dscf) \* (1,100 dscf/min) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

Concrete Bin Vent Filter #1 Emissions = (0.005 gr/dscf) \* (1,200 dscf/min) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

Concrete Bin Vent Filter #2 Emissions = (0.005 gr/dscf) \* (1,200 dscf/min) \* (60 min/hr) \* (annual operating hours) / (7000 gr/lb) / (2000 lbs/ton)

For Stacks S-20 and S-26, the baghouse outlet PE concentration shall be determined through the performance testing as described in f)(2). For S-20, the current baghouse outlet PE concentration is 0.002 gr/dscf from emissions testing conducted on 12/08. For S-26, the current baghouse outlet PE concentration is 0.0016 gr/dscf from emissions testing conducted on 12/08.

For Stacks S-20A, S-22, S-26A and the two concrete bin vent filters, if required, compliance may be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures

specified in OAC rule 3745-17-03(B)(10). For S-22, the current baghouse outlet PE concentration is 0.0016 gr/dscf from emissions testing conducted on 12/08.

PM<sub>10</sub> emissions from the baghouse are assumed to be equal to PE from the baghouse. Compliance with the allowable PM<sub>10</sub> baghouse exhaust concentration is assumed with compliance of the PE baghouse exhaust concentration.

- (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 between the months of May and September calendar year 2013.
  - b. The emission testing shall be conducted to:
    - i. demonstrate compliance with the outlet concentration of 0.005 gr PE/dscf for Stacks S20 and S26.
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
    - i. Methods 1 through 4 from 40 CFR Part 60, Appendix A for velocity traverses, velocity and volumetric flow rates, gas analysis, and moisture content;
    - ii. Method 5 of 40 CFR Part 60, Appendix A for filterable PE; and

Alternative U.S. EPA approved test methods may be used with prior approval from the Regional Air Pollution Control Agency.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency 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

**Final Permit-to-Install and Operate**

Andersons Marathon Ethanol LLC

**Permit Number:** P0107359

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appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.

**4. T003, Gasoline Denaturant Tank**

**Operations, Property and/or Equipment Description:**

200,000 gallon Above Ground Internal Floating Roof Storage Tank (Gasoline Denaturant Tank)

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

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

a. None.

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

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

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(A)(3), as effective 11/30/01 (P0107359)	Volatile organic compound (VOC) emissions shall not exceed 1.65 tons per rolling 12-month period.  See b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	VOC emissions shall not exceed 1.65 tons per rolling 12-month period.
d.	OAC rule 3745-21-09(L)	See b)(2)d.
e.	40 CFR Part 60, Subpart Kb	See b)(2)e, d)(2) through d)(7), e)(2) and e)(3).

(2) Additional Terms and Conditions

- a. The potential emissions are based on the annual production of 132,000,000 gallons of denatured ethanol.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled emissions from this air contaminant source since the potential to emit is less than ten tons per year.

- d. The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
  - i. The fixed roof storage tank shall be equipped with an internal floating roof.
  - ii. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports; and the rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
  - iii. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times, except when in actual use for tank gauging or sampling.
- e. Per 40 CFR Part 60, Subpart Kb, the fixed-roof vessel, equipped with an internal floating roof, must meet the following specifications:
  - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of

filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

- ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - (a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - (b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - (c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

c) Operational Restrictions

- (1) This above-ground storage tank shall only be used to store gasoline.
- (2) The annual gasoline throughput for this emissions unit shall not exceed 6,285,714 gallons based upon a rolling, 12-month summation of the gasoline throughput.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the gasoline throughput for each month, in gallons; and
  - b. the rolling, 12-month summation of the gasoline throughput, in gallons.
- (2) The permittee shall maintain records of the following information in a readily accessible location for at least five years and shall make copies of the records available upon request:
  - a. the types of petroleum liquids stored in the tank; and
  - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater 1.0 pound per square inch absolute.
- (3) The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with the volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (4) If the vessel is equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days.

If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Regional Air Pollution Control Agency in the inspection report required in e)(3)c. Such a request for an extension must document

that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

- (5) If the vessel is equipped with a double-seal system as specified in b)(2)d.ii.(b), the permittee shall:
  - a. visually inspect the vessel as specified in d)(6) at least every 5 years; or
  - b. visually inspect the vessel as specified in d)(4).
- (6) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in d)(4) and d)(5)b and at intervals no greater than 5 years in the case of vessels specified in d)(5)a.
- (7) The permittee shall keep the following records per 40 CFR Part 60, Subpart Kb:
  - a. the dimension of the storage vessel and an analysis showing the capacity of the storage vessel, kept for the life of the source; and
  - b. a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period, kept for at least 2 years.

For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

- (8) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month limitation of the gasoline throughput.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall notify the Regional Air Pollution Control Agency in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by d)(3) and d)(6) to afford the Regional Air Pollution Control Agency the opportunity to have an observer present. If the inspection required by d)(6) is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Regional Air Pollution Control Agency at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Regional Air Pollution Control Agency at least 7 days prior to the refilling.
- (3) After installation of this emissions unit with its associated control equipment (fixed roof and internal floating roof), the permittee shall meet the following requirements:
  - a. furnish the Regional Air Pollution Control Agency with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR Part 60, Subpart Kb. This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3);
  - b. keep a record of each inspection performed as required in d)(3) through d)(6). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings);
  - c. if any of the conditions described in d)(4) are detected during the annual visual inspection required by d)(4), a report shall be furnished to the Regional Air Pollution Control Agency within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made; and

- d. after each inspection required by d)(5) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in d)(5)b, a report shall be furnished to the Regional Air Pollution Control Agency within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of d)(3) and d)(5) and list each repair made.

The permittee shall keep copies of all reports and records required by e)(3) for at least 2 years.

- (4) The permittee shall notify the Regional Air Pollution Control Agency within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (5) The permittee shall submit annual reports which specify the total VOC emissions in tons from this emissions unit for the previous calendar year. This report shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.
- (6) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation

VOC emissions shall not exceed 1.65 tons per rolling 12-month period.

- Applicable Compliance Method

Compliance with the annual VOC emissions limitation is based on compliance with the gasoline throughput limitation.

g) Miscellaneous Requirements

- (1) None.

**5. Emissions Unit Group -Ethanol Tanks (except T002): T001, T004, T005, T006,**

EU ID	Operations, Property and/or Equipment Description
T001	200,000 gallon Above Ground Internal Floating Roof Storage Tank (190 Proof Ethanol Tank)
T004	1,500,000 gallon Above Ground Internal Floating Roof Storage Tank (Denatured Ethanol Tank No. 1)
T005	1,500,000 gallon Above Ground Internal Floating Roof Storage Tank (Denatured Ethanol Tank No. 2)
T006	1,500,000 gallon Above Ground Internal Floating Roof Storage Tank (Denatured Ethanol Tank No. 3)

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

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

a. None.

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

a. b)(1)c, c)(2), c)(3), d)(1), e)(1) and f).

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(A)(3), as effective 11/30/01 (P0107359)	Volatile organic compound (VOC) emissions from emissions unit T001 shall not exceed 0.71 ton per rolling 12-month period.  Combined VOC emissions from emissions units T004, T005 and T006 shall not exceed 0.96 ton per rolling 12-month period.  See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	VOC emissions from emissions unit T001 shall not exceed 0.71 ton per rolling 12-month period.  Combined VOC emissions from emissions units T004, T005 and T006 shall not exceed 0.96 ton per rolling 12-month period.
d.	OAC rule 3745-21-09(L)	See b)(2)d.
e.	40 CFR Part 60, Subpart Kb	See d)(1).

(2) Additional Terms and Conditions

- a. The rolling 12-month allowable emission rates are based on the annual production of 132,000,000 gallons of denatured ethanol.
- b. 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled emissions from this air contaminant source since the potential to emit is less than ten tons per year.

- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01(E)(13).

c) Operational Restrictions

- (1) This above-ground storage tanks shall only be used to store the following:
  - a. For emissions unit T001, 190 proof ethanol.
  - b. For emissions units T004, T005 and T006, denatured ethanol (ethanol and up to 5% gasoline).
- (2) The annual undenatured ethanol throughput for emissions unit T001 shall not exceed 188,000,000 gallons based upon a rolling, 12-month summation of the undenatured ethanol throughput.
- (3) The annual combined denatured ethanol throughput for emissions units T004, T005 and T006 shall not exceed 132,000,000 gallons based upon a rolling, 12-month summation of the denatured ethanol throughput.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the undenatured ethanol throughput for emissions unit T001 for each month, in gallons;
  - b. the combined denatured ethanol throughput for emissions units T004, T005 and T006 for each month, in gallons;
  - c. the rolling, 12-month summation of the undenatured ethanol throughput for emissions unit T001, in gallons; and
  - d. the rolling, 12-month summation of the combined denatured ethanol throughput for emissions units T004, T005 and T006, in gallons.
- (2) The permittee shall keep the following records per 40 CFR Part 60, Subpart Kb:
  - a. the dimension of the storage vessel and an analysis showing the capacity of the storage vessel, kept for the life of the source; and
  - b. a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period, kept for at least 2 years.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month limitation of the undenatured ethanol throughput for emissions unit T001; and
- ii. all exceedances of the rolling, 12-month limitation of the combined denatured ethanol throughput for emissions units T004, T005 and T006.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit annual reports which specify the total VOC emissions in tons from this emissions unit for the previous calendar year. This report shall be submitted by April 15 of each year. This requirement may be satisfied by including and identifying the specific emissions data from these emissions units in the annual Fee Emission Report.

f) Testing Requirements

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

- a. Emission Limitation

VOC emissions from emissions unit T001 shall not exceed 0.71 ton per rolling 12-month period.

Applicable Compliance Method

Compliance with the annual VOC emissions limitation is based on compliance with the undenatured ethanol throughput limitation.

- b. Emission Limitation

Combined VOC emissions from emissions units T004, T005 and T006 shall not exceed 0.96 ton per rolling 12-month period.

Applicable Compliance Method

Compliance with the annual VOC emissions limitation is based on compliance with the denatured ethanol throughput limitation.

g) Miscellaneous Requirements

- (1) None.