



Environmental Protection Agency

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

7/20/2011

Mr. Terry Ham
Consolidated Grain and Barge Co
5130 Port Road
Jeffersonville, IN 47130

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0320012005
Permit Number: P0108312
Permit Type: Initial Installation
County: Defiance

Certified Mail

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

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Consolidated Grain and Barge Co**

Facility ID:	0320012005
Permit Number:	P0108312
Permit Type:	Initial Installation
Issued:	7/20/2011
Effective:	7/20/2011
Expiration:	6/28/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Consolidated Grain and Barge Co

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. F002 11
2. F003 17
3. F004 22

Authorization

Facility ID: 0320012005
Application Number(s): A0042130, A0042176
Permit Number: P0108312
Permit Description: Grain Elevator - a new installation, including grain receiving operations, conveyance /transfer, grain load-out operations, and one grain dryer. Voluntary requirements have been included under OAC 3745-31-05(F) to limit Potential to Emit.
Permit Type: Initial Installation
Permit Fee: \$2,550.00
Issue Date: 7/20/2011
Effective Date: 7/20/2011
Expiration Date: 6/28/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Consolidated Grain and Barge Co
C R 424 and Krouse Rd
Defiance, OH 43512

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

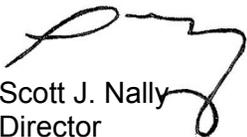
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108312

Permit Description: Grain Elevator - a new installation, including grain receiving operations, conveyance /transfer, grain load-out operations, and one grain dryer. Voluntary requirements have been included under OAC 3745-31-05(F) to limit Potential to Emit.

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:	G. E. No. 1 (suggest P 901)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	P 901
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	P 903
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. F002

Operations, Property and/or Equipment Description:

Grain Dryer - 196 tons (7000 bushels) /hr - 76 mmBtu/hrn.g.

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.	OAC rule 3745-31-05 (F)	5.39 tons fugitive particulate matter 10 microns or less in size (PM ₁₀) /yr 3.80 tons fugitive nitrogen oxides (NO _x) /yr (from the combustion of natural gas) 3.19 tons fugitive carbon monoxide (CO) /yr (from the combustion of natural gas) Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the grain dryer. The perforation plate hole diameter shall not exceed 0.094 inches. See b)(2)a and c)(1).

b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05 (A)(3)(a)(ii), as effective 12/01/06	See b)(2)c and b)(2)d.
d.	40 CFR 60.300 et seq. (NSPS Subpart DD)	See b)(2)e.
e.	OAC rule 3745-17-07 (B)	See b)(2)f.
f.	OAC rule 3745-17-08 (B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are in part based on the operational restrictions contained in c)(1) which limits hours of operation:
 - i. 5.39 tons PM₁₀ /year.
 - ii. 3.80 tons NO_x /year.
 - iii. 3.19 tons CO /year.
 - iv. Visible fugitive PE shall not exceed 20% opacity, as a three-minute average from the grain dryer.
 - v. The perforation plate hole diameter shall not exceed 0.094 inches.
- b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:
 - i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
 - ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the

revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the emissions of PM₁₀, NO_x, and CO since the potential to emit, taking into account the voluntary restriction on hours of operation, is less than 10 tons per year, per pollutant.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.
- e. This facility has permanent grain storage capacity less than 2,500,000 bushels, and therefore is not a "grain terminal elevator" subject to NSPS Subpart DD.
- f. This emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07 (B)(11)(e).
- g. This facility is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).

c) **Operational Restrictions**

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]: The maximum annual hours of operation for this emissions unit shall not exceed 1000.

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

- (1) The permittee shall maintain monthly records of the hours of operation for this emissions unit (in hours per month and total hours, to date for the calendar year).
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the grain

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

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) 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.

The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(2):

- a. all days during which any visible fugitive particulate emissions were observed from this emissions unit.
- b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

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

The permittee shall also include in the PER (or attachment) the dryer hours of operation for the most recently completed calendar year.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:
5.39 tons fugitive PM₁₀ /year

Applicable Compliance Method:

The annual PM₁₀ limitation was developed by multiplying the maximum grain dryer throughput of 196,000 tons /year, the AP-42 emission factor of 0.055 lb PM₁₀ /ton of grain [Table 9.9.1-1 (update 5/2003)], then dividing by 2000 lbs/ton. The maximum grain throughput was developed by multiplying the maximum drying capacity of the grain dryer of 7000 bushels/hour, a maximum operational schedule of 1000 hours, and conversion factors of 56 lbs/bushel (corn) and 1 ton/2000 lbs. Therefore, provided compliance is shown with the hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

- b. Emission Limitations:
3.80 tons NO_x /yr (from the combustion of natural gas)

Applicable Compliance Method:

The annual NO_x limitation was developed by multiplying the maximum hourly gas burning capacity of 76 mmBtu/hr, the AP-42 emission factor for natural gas of 0.100 lb NO_x /mmBtu [Table 1.4-1 (revised 7/98)] and a maximum operational schedule of 1000 hours, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

- c. Emission Limitations:
3.19 tons CO/year (from the combustion of natural gas)

Applicable Compliance Method:

The annual CO limitation was developed by multiplying the maximum hourly gas burning capacity of 76 mmBtu/hr, the AP-42 emission factor for natural gas of 0.084 lb CO /mmBtu [Table 1.4-1 (revised 7/98)] and a maximum operational schedule of 1000 hours, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

- d. Emission Limitations:
Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the grain dryer.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, and (if applicable) the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- g) Miscellaneous Requirements
 - (1) None.

2. F003

Operations, Property and/or Equipment Description:

Grain Receiving - truck and rail

- 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.	OAC rule 3745-31-05(F)	9.19 tons fugitive particulate matter 10 microns or less in size (PM ₁₀) /yr Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the truck /rail unloading operations. See b)(2)a and c)(1).
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c and b)(2)d.
d.	40 CFR 60.300 et seq. (NSPS Subpart DD)	See b)(2)e.
e.	OAC rule 3745-17-07(B)	See b)(2)f.
f.	OAC rule 3745-17-08(B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(1) which include throughput restrictions and control measures:
- i. fugitive emission limitation for operations for grain receiving, transferring, conveying, and bin vents, of 9.19 ton particulate matter 10 microns or less in size (PM₁₀) per year.
 - ii. visible fugitive particulate emission limitation to not exceed 20% opacity as a three-minute average when performing unloading operations.
- b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:
- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
 - ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM10 emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.
- e. This facility has permanent grain storage capacity less than 2,500,000 bushels, and therefore is not a "grain terminal elevator" subject to NSPS Subpart DD.
- f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- g. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:
 - a. use of baffles (i.e. 'one-way-valve'-type sections at/below the receiving pit grates, that are closed whenever grain is not falling through those sections) for truck and rail unloading.
 - b. use of a partial building enclosure for all truck unloading into receiving pits.
 - c. use of totally enclosed transferring/conveying operations.
 - d. use of mineral oil application if/when needed.
 - e. a maximum receiving throughput for this emissions unit of 840,000 tons of grain per year.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of grain throughput in this emissions unit (in tons per month and total tons, to date for the calendar year).

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the truck /rail unloading operations (including transfer /conveying /bin vents). 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 and location 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 abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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

The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(2):

- a. all days during which any visible fugitive particulate emissions were observed from any grain receiving operation for this emissions unit.
- b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

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

The permittee shall also include in the PER (or attachment) the total grain receiving throughput for the most recently completed calendar year.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
9.19 tons fugitive PM₁₀ /yr

Applicable Compliance Method:

The annual fugitive PM₁₀ limitation was developed based on a maximum annual grain receiving throughput of 840,000 tons, and emissions estimates for the following operations:

- i. a maximum throughput of 840,000 tons (for all truck and rail unloading) multiplied by an emission factor* of 0.059 lb of PM₁₀ /ton of grain (AP-42 Table 9.9.1-1 [3/03]), and applying a 75% control efficiency for use of partial building enclosure /pit grate baffles, then dividing by 2000 lbs /ton.
- ii. a maximum throughput of 840,000 tons (for silo bin vents) multiplied by an emission factor of 0.0063 lb of PM₁₀ /ton of grain (AP-42 Table 9.9.1-1 [3/03]), then dividing by 2000 lbs /ton.
- iii. a maximum throughput /turnover of 2,083,000 tons (for enclosed headhouse /conveyors) multiplied by an emission factor of 0.034 lb of PM₁₀ /ton of grain (AP-42 Table 9.9.1-1 [3/03]), and applying a 99% control efficiency, then dividing by 2000 lbs /ton.

* conservatively counts all truck and rail dumping as 'straight' (i.e. not 'hopper') truck dumping

Therefore, provided compliance with the annual grain throughput and other operational restrictions is shown, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:
Visible fugitive particulate emission limitation of 20% opacity, as a three-minute average, when performing unloading operations.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.

3. F004

Operations, Property and/or Equipment Description:

Grain Load-out - truck and rail

- 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.	OAC rule 3745-31-05(F)	3.04 tons fugitive particulate matter 10 microns or less in size (PM ₁₀) /yr Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the truck /rail unloading operations. See b)(2)a and c)(1).
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.
	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c and b)(2)d.
	40 CFR 60.300 et seq. (NSPS Subpart DD)	See b)(2)e.
	OAC rule 3745-17-07(B)	See b)(2)f.
	OAC rule 3745-17-08(B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(1) which include throughput restrictions and control measures:
- i. fugitive emission limitation for operations for grain load-out of 3.04 ton particulate matter 10 microns or less in size (PM₁₀) per year;
 - ii. visible fugitive particulate emission limitation to not exceed 20% opacity as a three-minute average when performing unloading operations.
- b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:
- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
 - ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM₁₀ emissions from this air contaminant source

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

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.
- e. This facility has permanent grain storage capacity less than 2,500,000 bushels, and therefore is not a "grain terminal elevator" subject to NSPS Subpart DD.
- f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- g. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):
 - a. a maximum load-out throughput for this emissions unit of 840,000 tons of grain per year.
 - b. use of adjustable loading spout(s) /sock(s).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of grain throughput in this emissions unit (in tons per month and total tons, to date for the calendar year).
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the truck /rail loading 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 and location 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 abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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

The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(2):

- a. all days during which any visible fugitive particulate emissions were observed from the any grain load-out operation for this emissions unit.
- b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

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

The permittee shall also include in the PER (or attachment) the total grain load-out throughput for the most recently completed calendar year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
3.04 tons fugitive PM₁₀ /yr

Applicable Compliance Method:

The annual fugitive PM₁₀ limitation was developed based on a maximum throughput of 840,000 tons (for all truck and rail load-out) multiplied by an emission factor* of 0.029 lb of PM₁₀ /ton of grain (AP-42 Table 9.9.1-1 [3/03]), and applying a 75% control efficiency for use of adjustable loading spout(s) /sock(s), then dividing by 2000 lbs /ton.

* conservatively counts all (i.e. truck and rail) dumping as truck dumping

Therefore, provided compliance with the annual grain throughput and other operational restrictions is shown, compliance with the annual emission limitation shall also be demonstrated.

- b. Emission Limitation:
Visible fugitive particulate emission limitation of 20% opacity, as a three-minute average, when performing loading operations.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- g) Miscellaneous Requirements

- (1) None.