Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

12/22/2011

JOE BLANTON
CEREAL FOOD PROCESSORS, INC.
1635 MERWIN
CLEVELAND, OH 44113

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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318000229
Permit Number: P0109223
Permit Type: Administrative Modification
County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297or 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

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

Cc: CDAQ

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
CEREAL FOOD PROCESSORS, INC.

Facility ID:	1318000229
Permit Number:	P0109223
Permit Type:	Administrative Modification
Issued:	12/22/2011
Effective:	12/22/2011
Expiration:	12/8/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
CEREAL FOOD PROCESSORS, INC.

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Authorization

Facility ID: 1318000229
Application Number(s): M0001492
Permit Number: P0109223
Permit Description: Admin mod for a renewal FEPTIO issued on 12/8/2011 for 5 emissions units (F001 - F005) used to unload, store, mill and load feed of raw wheat arriving from the field interchangeably with other byproducts.
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 12/22/2011
Effective Date: 12/22/2011
Expiration Date: 12/8/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CEREAL FOOD PROCESSORS, INC.
1635 MERWIN
Cleveland, OH 44113

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0109223
Permit Description: Admin mod for a renewal FEPTIO issued on 12/8/2011 for 5 emissions units (F001 - F005) used to unload, store, mill and load feed of raw wheat arriving from the field interchangeably with other byproducts.

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

Group Name: F001-F005

Emissions Unit ID:	**F001**
Company Equipment ID:	Grain receiving and blending
Superseded Permit Number:	P0108218
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F002**
Company Equipment ID:	Barge unloading and wheat tempering for mill
Superseded Permit Number:	P0108218
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F003**
Company Equipment ID:	Grain milling system
Superseded Permit Number:	P0108218
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F004**
Company Equipment ID:	Flour handling and loading
Superseded Permit Number:	P0108218
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F005**
Company Equipment ID:	Feed product loading
Superseded Permit Number:	P0108218
General Permit Category andType:	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 takenby 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 Cleveland Division of Air Quality 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[1] 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.

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

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. Emissions Unit Group -F001-F005: F001, F002, F003, F004, F005

EU ID	Operations, Property and/or Equipment Description
F001	Grain receiving and blending, controlled by baghouse, Bucket Elevator, Drag Conveyors "C-House"
F002	Barge unloading and wheat tempering for mill, controlled by baghouse, Storage bins, Conveyors, Bucket Elevator "A-House"
F003	Grain milling system, controlled by baghouse, Grinders, separators, sifting conveyors, "Mill Building"
F004	Flour handling and loading, controlled by baghouse, Bins, Sifters, Impact Mills, "Flour Warehouse"
F005	Feed product loading, controlled by baghouse, Bins, pneumatic conveying

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

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

a. None.

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

a. b)(1)e., d)(1), d)(2), e)(3), f)(1)c., 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.	OAC rule 3745-17-07(A)(1)	See b)(2)a. below.
b.	OAC rule 3745-17-07(B)(1)	See b)(2)b. below.
c.	OAC rule 3745-17-08(B)	See b)(2)c. below.
d.	OAC rule 3745-17-08(B) (3)(b)	The particulate emission limit required by this rule is less stringent than the particulate emission limit established under OAC rule 3745-31-05(D)(1)(b).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Particulate emissions shall not exceed 35.45 tons/year facility-wide and 0.010 gr/dscf from each baghouse for each emissions unit.

(2) Additional Terms and Conditions

a. Visible particulate emissions from each baghouse stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

b. Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

c. The permittee shall employ reasonably available control measures (RACM) that shall include the use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit and shall meet the following requirements:

i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design;

ii. at F001:

(a) the mechanical conveying system shall be maintained and operated in a totally enclosed manner so as to eliminate the generation of visible emissions of fugitive dust during the rail car and truck unloading operations;

(b) any leaks in the mechanical conveying system shall be promptly repaired, and any spills or accumulations shall be promptly cleaned up; and

(c) an engineered system shall be used to minimize or eliminate the generation of visible emissions of fugitive dust during unloading at the bulk rail car unloading station - units loaded with wheat are placed directly over the unloading pit, the units are opened allowing the unloading pit to fill and creating a choked or flooded collar around the pit and discharge of the unit where the choked condition prevents fugitive dust emissions;

iii. at F002:

(a) the marine leg and its control equipment and enclosures shall be maintained and operated so as to minimize or eliminate the

generation of visible emissions of fugitive dust during the barge unloading operation;

(b) the other grain conveying equipment and associated control equipment and enclosures covered by this permit shall be maintained and operated so as to eliminate any visible emissions from any opening in the A-House; and

(c) any leaks shall be promptly repaired and any spill or accumulations shall be promptly cleaned up;

iv. at F003:

(a) maintain and operate the enclosure and the collection system used to control emissions from throughout the mill building to eliminate escape of particulate emissions from any opening of the mill building;

v. at F004:

(a) all the pneumatic conveyers placed out of buildings shall be enclosed and equipped with baghouse(s);

(b) truck and rail car shall utilize fabric filter socks during loading; and

(c) the storage bins shall be equipped with baghouse all the time;

vi. at F005:

(a) the rail car hatch openings shall be covered and equipped with fabric filter material to minimize or eliminate visible fugitive dust emissions during loading - the railcar lids are secured using latches attached to the car tops which are engineered for that purpose, the loading hose is locked into place and covered by a canvas fabric material used to eliminate fugitive dust emissions, where the fabric material is made from heavy duty, 30 mil, water resistant, 100% polyester material;

(b) a drop sock shall be used during the truck loading operation to control or eliminate the fugitive dust emissions; and

(c) the shipping areas shall be kept as clean as possible by prompt cleaning up of spills, leaks, etc..

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse shall be maintained between 1 to 10 inches of water.

(2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a weekly basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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 the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (CDAQ). 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(s). 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.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each baghouse stack and for any visible emissions of fugitive dust from the non-stack egress points from all of the grain receiving and processing operations. For emissions units that are located inside a building, this shall include visible fugitive emission observations at the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) servicing each emissions unit. For emissions units that are located outside of buildings, the visible fugitive emission checks shall be performed at the points of capture (e.g. transfer point) used to control fugitive emissions. The presence of any visible particulate emissions from the baghouse stacks and/or visible fugitive dust emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

(4) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, modify the above-mentioned frequencies for performing the visible emissions

checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible fugitive dust emissions in d)(3) above:

a. all days during which any visible particulate emissions were observed from the baghouse stack(s) serving this emissions unit;

b. all days during which any visible emissions of fugitive dust were observed from the fugitive egress points (i.e., building windows, doors, roof monitors, etc. for indoor sources and points of capture for outdoor sources) serving emissions units F001 – F005; and

c. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

(3) 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. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

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 Cleveland Division of Air Quality.

(4) 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.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from each baghouse stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)(a). Testing shall be performed in accordance with f)(2) below.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). Testing shall be performed in accordance with f)(2) below.

c. Emission Limitation:

The particulate emissions from each baghouse for each emissions unit shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with U.S. EPA Reference Methods 1-5. Testing shall be performed in accordance with f)(2) below.

d. Emission Limitation:

35.45 tons/year of particulate emissions

Applicable Compliance Method:

The ton/year limit was established by multiplying the allowable limit of 0.01 gr/dscf by the combined total maximum air flow rate for all of the baghouses (sum the maximum dscf/min for each baghouse) and multiply by 60 minutes/hour, and divide by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.01 gr/dscf limit, compliance shall be assumed with the ton/year limit.

(2) The permittee shall conduct, or have conducted, emission testing for the largest baghouse at this facility in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation (0.01 gr/dscf) for particulates, and for both the stack and fugitive opacity limits. The emission testing shall be performed on the General Mill baghouse (32,000 acfm) which is the largest baghouse at this facility.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1 through 5 of 40 CFR Part 60, Appendix A.
Method 9 of 40 CFR Part 60, Appendix A.

The Method 9 readings shall be performed for all of the baghouse stacks at this facility as well as for all of the fugitive egress points (i.e., building windows, doors, roof monitors, etc. for indoor sources and points of capture for outdoor sources) for all of the emissions units at this facility.

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

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ). Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

f. Personnel from the Cleveland DAQ 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 Cleveland DAQ 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 Cleveland DAQ..

g) Miscellaneous Requirements

(1) The five emission units were installed prior to 1974.