



Environmental Protection Agency

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

8/8/2012

Scott Millikan
Pioneer Hi-Bred International, Inc.
15180 Henry Wood County Road
Grand Rapids, OH 43522

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

Facility ID: 0387002013
Permit Number: P0109474
Permit Type: Initial Installation
County: Wood

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

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	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



Response to Comments

Facility ID:	0387002013
Facility Name:	Pioneer Hi-Bred International, Inc.
Facility Description:	
Facility Address:	15180 Henry Wood Rd Grand Rapids, OH 43522 Wood County
Permit:	P0109474, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the TheSentenil-Tribune on 07/06/2012. The comment period ended on 08/05/2012.	
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.

1. Topic: Facility submitted requests for changes

- a. Comment: As attached
- b. Response: Changes have been incorporated into the permit and those changes have been saved in attachments section.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Pioneer Hi-Bred International, Inc.**

Facility ID:	0387002013
Permit Number:	P0109474
Permit Type:	Initial Installation
Issued:	8/8/2012
Effective:	8/8/2012
Expiration:	8/8/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
Pioneer Hi-Bred International, Inc.

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Authorization

Facility ID: 0387002013
Application Number(s): A0043608
Permit Number: P0109474
Permit Description: Soybean and wheat seed conditioning facility - remodeling the facility's seed conditioning system via installation of new process and control equipment while existing process equipment will be upgraded with new technologies to match new market requirements and increased seed capacity demands.
Permit Type: Initial Installation
Permit Fee: \$6,900.00
Issue Date: 8/8/2012
Effective Date: 8/8/2012
Expiration Date: 8/8/2017
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Pioneer Hi-Bred International, Inc.
15180 Henry Wood Rd
Grand Rapids, OH 43522

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

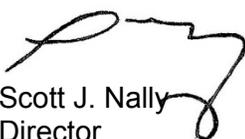
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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: P0109474
Permit Description: Soybean and wheat seed conditioning facility - remodeling the facility's seed conditioning system via installation of new process and control equipment while existing process equipment will be upgraded with new technologies to match new market requirements and increased seed capacity demands.

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

- Emissions Unit ID: P001**
Company Equipment ID: Conditioning of Soybeans and Wheat
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P002**
Company Equipment ID: Treating and Packaging of Soybeans and Wheat
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P901**
Company Equipment ID: Soybean and Wheat Receiving, Transfer, and Storage
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P902**
Company Equipment ID: Discard Bins and Discard Bin Loadouts
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. P001, Conditioning of Soybeans and Wheat

Operations, Property and/or Equipment Description:

This emissions unit is comprised of the following equipment: Precleaner Surge Bin, Raw Seed Precleaner, Cleaner Surge Bin, Fines Cleaner, Spiral Filling/Distribution Hopper, West & East Spiral Surge Bins, Spiral Cabinets, Gravity Table Surge Bins, Gravity Table Separators, Rerun Gravity Surge Bin, Rerun Gravity, Color Sorter Surge Bin, Color Sorter, Destoner Surge Bin and Destoner

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)	<u>Precleaner Surge Bin and Raw Seed Precleaner:</u> 2.52 lbs particulate emissions (PE)/hour, 2.76 tons PE/year 0.64lb particulate matter 10 microns or less in diameter (PM ₁₀)/hour, 0.70 ton PM ₁₀ /year Visible PE from any stack serving this equipment shall not exceed 20% opacity as a six-minute average. <u>Cleaner Surge Bin and Fines Cleaner:</u> 0.63 lb PE/hour and 2.76 tons PE/year 0.16lb PM ₁₀ /hour, 0.70 ton PM ₁₀ /year



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible PE from any stack serving this equipment unit shall not exceed 5% opacity as a six-minute average.</p> <p><u>Spiral Filling/Distribution Hopper, West and East Spiral Surge Bins, Spiral Cabinets, Color Sorter Surge Bin and Color Sorter:</u> 0.24lbPE/hour and 1.04 tons PE/year 0.10 lb PM₁₀/hour, 0.46 ton PM₁₀/year</p> <p>Visible PE from each stack serving each equipment system shall not exceed 0% opacity, as a six-minute average</p> <p><u>Gravity Table Surge Bins and Gravity Table Separators:</u> 0.10 lb PE/hour and 0.45 ton PE/year 0.05lb PM₁₀/hour, 0.21 ton PM₁₀/year</p> <p>Visible PE from each stack serving each equipment system shall not exceed 0% opacity, as a six-minute average</p> <p><u>Rerun Gravity Surge Bin and Rerun Gravity:</u> 0.06lb PE/hour and 0.23 ton of PE/year 0.02lb PM₁₀/hour, 0.11 ton PM₁₀/year</p> <p>Visible PE from each stack serving each equipment system shall not exceed 0% opacity, as a six-minute average</p> <p><u>Destoner Surge Bin and Destoner:</u> 0.06lb PE/hour and 0.23 ton PE/year 0.02lb PM₁₀/hour, 0.11 ton PM₁₀/year</p> <p>Visible PE from each stack serving each equipment system shall not exceed 0% opacity, as a six-minute average</p> <p>See b)(2)a.</p>
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 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

- a. The legally and practically enforceable PM₁₀ emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

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

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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.

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

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 emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).
- e. The visible emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).

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. the use of a baghouse system, whenever this air contaminant source is in operation, with a minimum control efficiency of 98%, by weight for PE.
- (2) The annual throughput to the Precleaner Surge Bin and Raw Seed Precleaner is limited to 526,000 tpy by an inherent process bottleneck. All other sources are permitted at capacity.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of throughput from the equipment (in tons per month and total tons, to date for the calendar year).
- (2) The permittee shall perform weekly checks, when the equipment 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. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term d)(2) above:
- all events during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The above information shall be provided as an attachment to the PER. If there were no event(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.
- 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:
- Emission Limitations:
 - 2.52lbs/hr, 2.76 tons/yr PE; 0.64lb/hr, 0.70ton/yr PM₁₀from precleaner surge bin and raw seed cleaner
 - 0.63 lb/hr, 2.76 tons/yrPE; 0.16lb/hr, 0.70 ton/yr PM₁₀from the cleaner surge binand fines cleaner
 - 0.24lb/hr, 1.04 tons/yrPE; 0.10 lb/hr, 0.46 ton/yr PM₁₀fromthe spiral filling/distribution hopper, two West & East spiral surge bins, six spiral cabinets, color sorter surge bin and color sorter
 - 0.10 lb/hr, 0.45 ton/yrPE; 0.05lb/hr, 0.21 ton/yr PM₁₀from the two gravity table surge bins and four gravity separators
 - 0.06lb/hr, 0.23 ton/yr PE; 0.02lb/hr, 0.11 ton/yr PM₁₀from the rerun gravity surge bin and rerun gravity
 - 0.06lb/hr, 0.23 ton/yr PE; 0.02lb/hr, 0.11 ton/yr PM₁₀from the destoner surge bin and the destoner
- Applicable Compliance Method:
The hourly emission limitation represents the potential to emit* of the emission unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with the emissions limitations.
- *The potential to emit is based on multiplying the corresponding AP-42 emission factor (Section 9.9.1 (3/2003)) by the corresponding maximum hourly and annual throughputof seed and (1 - 0.98) as the control efficiency for the baghousecontrol system:



Equipment	PE Emission Factor PM₁₀ Emission Factor	Hourly Process Rate (tons)	Annual Process Rate (tons)
Precleaner Surge Bin	0.025 lb/ton 0.0063 lb/ton	240	525,600
Raw Seed Precleaner	0.500 lb/ton 0.127 lb/ton	240	525,600
Cleaner Surge Bin	0.025 lb/ton 0.0063 lb/ton	60	525,600
Fines Cleaner	0.500 lb/ton 0.127 lb/ton	60	525,600
SpiralFilling/Distribution Hopper	0.025 lb/ton 0.0063 lb/ton	60	525,600
West & East Spiral Surge Bins	0.025 lb/ton 0.0063 lb/ton	60	525,600
Spiral Cabinets	0.061 lb/ton 0.034 lb/ton	60	525,600
Gravity Table Surge Bins	0.025 lb/ton 0.0063 lb/ton	60	525,600
Gravity Table Separators	0.061 lb/ton 0.034 lb/ton	60	525,600
Rerun Gravity Surge Bin	0.025 lb/ton 0.0063 lb/ton	30	262,800
Rerun Gravity	0.061 lb/ton 0.034 lb/ton	30	262,800
Color Sorter Surge Bin	0.025 lb/ton 0.0063 lb/ton	60	525,600
Color Sorter	0.061 lb/ton 0.034 lb/ton	60	525,600
Destoner Surge Bin	0.025 lb/ton 0.0063 lb/ton	30	262,800
Destoner	0.061 lb/ton 0.034 lb/ton	30	262,800

If required, compliance with the PE hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Method 5 of 40 CFR, Part 60, Appendix A. If required, compliance with the PM₁₀ hourly emissions limitation shall be determined in accordance with the test



methods and procedures in Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

Compliance with the annual emissions limitation shall be demonstrated provided compliance is shown with the annual throughput restriction.

- b. Emission Limitation: Visible particulate emissions from any stack serving the cleaner surge bin and fines cleaner shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: Visible particulate emissions from any stack serving the precleaner surge bin and raw seed precleaner shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method: If required, compliance with the stack visible particulate emissions limitations shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- d. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit not specified with an opacity limit shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method: If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The permittee has committed to using a baghouse control system that has at least 98% control efficiency of PE. Any baghouse control system can be replaced with another control system that is as efficient provided that prior notification is made to the Director (the Northwest District Office). The following table details the existing control equipment:

Table with 2 columns: Equipment, Control Equipment ID(s). Rows include Precleaner Surge Bin and Raw Seed Precleaner, both with Scalperator Filter 76950.



Equipment	Control Equipment ID(s)
Cleaner Surge Bin	Fines Cleaner Filter 76400
Fines Cleaner	Fines Cleaner Filter 76400
Spiral Filling/Distribution Hopper	General Dust Collector 76000
West & East Spiral Surge Bins	General Dust Collector 76000
Spiral Cabinets	General Dust Collector 76000
Gravity Table Surge Bins	Gravity #1-#4 Filters 76100, 76200, 76300, 76800
Gravity Table Separators	Gravity #1-#4 Filters 76100, 76200, 76300, 76800
Rerun Gravity Surge Bin	Re-run Gravity Filter 76500
Rerun Gravity	Re-run Gravity Filter 76500
Color Sorter Surge Bin	General Dust Collector 76000
Color Sorter	General Dust Collector 76000
Destoner Surge Bin	Stoner Filter 76600
Destoner	Stoner Filter 76600



2. P002, Treating and Packaging of Soybean and Wheat

Operations, Property and/or Equipment Description:

This emissions unit is comprised of the following equipment:Treater Surge Bin, Treater, Treated/Untreated Seed Aspirators and Seed Bins, Treated/Untreated Bagging Scale Surge Bins, Treated/Untreated Bag Packaging and Jumbo Bag Packaging, Treated/Untreated ProBox Fill Surge Bins and ProBoxFilling, Treated/Untreated Rebagging Surge Hopper / Dump Stations, Treated/Untreated Bag Splitters

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. d)(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)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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(F) | Treater Surge Bin, Treater, Seed Bins, Seed Aspirators, Bagging Scale Surge Bins and Bag Packaging: 0.69lb particulate emissions (PE)/hour, 2.98 tons PE/year; 0.24 lb particulate matter 10 microns or less in diameter (PM10)/hour, 1.01 tons PM10/year; Visible PE from each stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average; Jumbo Bag Packaging, ProBox Fill Surge Bins, ProBox Filling, Rebagging Surge



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>Hopper/Dump Stations, Bag Splitters:</u> 0.44lb PE/hour and 1.92 tons PE/year 0.22lb PM₁₀/hour and 1.01 tons PM₁₀/year</p> <p>Visible PE from each stack serving this emissions unit shall not exceed 0% opacity, as a six-minute average</p> <p>See b)(2)a.</p>
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 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC rule 3745-31-05(D)	<p>Facility-wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month period of any single HAP or 24.9 tons per rolling, 12-month period of all HAPs.</p> <p>Facility-wide volatile organic compound (VOC) emissions shall not exceed 99.9 tons per rolling 12-month period.</p>
g.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

- a. The legally and practically enforceable PM₁₀emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

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

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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.

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

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 emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).
- e. The visible emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).

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. the use of a baghouse system, whenever this air contaminant source is in operation, with a minimum control efficiency of 98%, by weight for PE.

d) Monitoring and/or Recordkeeping Requirements

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

- (2) The permittee shall perform weekly 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:
- the color of the emissions;
 - the total duration of any visible emissions incident; and
 - any corrective actions taken to eliminate the visible emissions.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year based on the information provided in the application. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO. In lieu of an application, the permittee may submit air toxics modeling which demonstrates compliance with the "Toxic Air Contaminant Statute".
- (4) The permittee shall collect and record the following information each month for the treatments applied by the treater:
- the company identification for each VOC- and/or HAP-containing material;
 - the total and individual VOC and HAP content of each VOC- or HAP-containing material;
 - the amount of each VOC- or HAP-containing material applied during the previous calendar month;
 - the total emissions from each individual HAP from all HAP-containing materials applied during the previous calendar month, recorded in pounds or tons per month;
 - the total VOC and total HAP emissions from all VOC- or HAP-containing materials applied during the previous calendar month, recorded in pounds or tons per month;
 - the rolling 12-month summation of total HAP and each individual HAP from all HAP-containing materials applied during the period encompassing the previous calendar month and the 11 months prior to it, recorded in tons per year; and
 - the rolling 12-month summation of VOC emissions from all VOC-containing materials applied during the period encompassing the previous calendar month and the 11 months prior to it, recorded in tons per year.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term d)(2) above:
 - a. all events during which any visible particulate emissions were observed from the stacks serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The above information shall be provided as an attachment to the PER. If there were no event(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.

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:
0.69lb/hr, 2.98 tons/yr PE; 0.24 lb/hr, 1.01 tons/yr PM₁₀ from treater surge bin, treater, treated/untreated seed aspirators, treated/untreated seed bins, bagging scale surge bins and bag packaging
0.44lb/hr, 1.92 tons/yr PE; 0.22lb/hr, 1.01 tons/yr PM₁₀ from the treated/untreated jumbo bag packaging, ProBox fill surge bins, ProBox filling, rebagging surge hopper/dump stations and bag splitters

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emission unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with the emissions limitations.

*The potential to emit is based on multiplying the corresponding AP-42 emission factor (Section 9.9.1 (3/2003)) by the corresponding maximum hourly and annual throughputs of seed and (1 - 0.98) as the control efficiency for the baghouse control system:



Equipment	PE Emission Factor PM₁₀ Emission Factor	Hourly Process Rate (tons)	Annual Process Rate (tons)
Treater Surge Bin	0.025 lb/ton 0.0063 lb/ton	30	262,800
Treater	0.061lb/ton 0.034lb/ton	30	262,800
Untreated Seed Aspirator	0.500lb/ton 0.127lb/ton	18	157,680
Treated Seed Aspirator	0.500 lb/ton 0.127 lb/ton	18	157,680
Untreated Seed Bins 1-4	0.025 lb/ton 0.0063 lb/ton	72	630,720
Treated Seed Bins 1-4	0.025 lb/ton 0.0063 lb/ton	48	420,480
Bagging Scale Surge Bins (Treated/Untreated)	0.025lb/ton 0.0063lb/ton	120	1,051,200
Bag Packaging (Treated/Untreated)	0.061lb/ton 0.034lb/ton	120	1,051,200
Jumbo Bag Packaging (Treated/Untreated)	0.061 lb/ton 0.034 lb/ton	120	1,051,200
ProBox Fill Surge Bins (Treated/Untreated)	0.025 lb/ton 0.0063 lb/ton	120	1,051,200
ProBox Filling (Treated/Untreated)	0.061 lb/ton 0.034 lb/ton	120	1,051,200
Rebagging Surge Hopper/Dump Station (Treated/Untreated)	0.061lb/ton 0.034lb/ton	36	315,360
Bag Splitters(Treated/Untreated)	0.061 lb/ton 0.034 lb/ton	36	315,360

If required, compliance with the PE hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Method 5 of 40 CFR, Part 60, Appendix A. If required, compliance with the PM₁₀ hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

Compliance with the annual emissions limitation shall be demonstrated provided compliance is shown with the annual throughput restriction.

- b. Emission Limitation: 99.9
tons of VOC per rolling, 12-month period from the treater

Applicable Compliance Method:

The hourly emission rate represents the potential to emit* of the emission unit.

*The potential to emit is based on the maximum hourly throughput of 30 tons of grain.

Compliance with the annual limit shall be based on the recordkeeping requirements established in section d)(4) of this permit.

- c. Emission Limitation:
9.9 tons of any single hazardous air pollutant (HAP) per rolling, 12-month period;
24.9 tons of all HAPs per rolling, 12-month period from the treater

Applicable Compliance Method:

Compliance with the annual limits shall be based on the recordkeeping requirements established in section d)(4) of this permit.

- d. Emission Limitation:
Visible particulate emissions from any stack serving the Jumbo Bag Packaging, ProBox Fill Surge Bins, ProBox Filling, Rebagging Surge Hopper/Dump Stations and Bag Splitters shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitation:
Visible particulate emissions from any stack serving the Treater Surge Bin, Treater, Seed Bins, Seed Aspirators, Bagging Scale Surge Bins and Bag Packaging shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The permittee has committed to using a baghouse control system that has at least 98% control efficiency of PE. Any baghouse control system can be replaced with another control system that is as efficient provided that prior notification is made to the Director (the Northwest District Office). The following table details the existing control equipment:



Equipment	Control Equipment ID(s)
Treater Surge Bin	Red Dust Filter 76700
Treater	Red Dust Filter 76700
Untreated Seed Aspirator	Red Dust Filter 76700
Treated Seed Aspirator	Red Dust Filter 76700
Untreated Seed Bins 1-4	Red Dust Filter 76700
Treated Seed Bins 1-4	Red Dust Filter 76700
Bagging Scale Surge Bins (Treated/Untreated)	Red Dust Filter 76700
Bag Packaging (Treated/Untreated)	Red Dust Filter 76700
Jumbo Bag Packaging (Treated/Untreated)	Packaging ToritBaghouse
ProBox Fill Surge Bins (Treated/Untreated)	Packaging ToritBaghouse
ProBox Filling (Treated/Untreated)	Packaging ToritBaghouse
Rebagging Surge Hopper/Dump Stations (Treated/Untreated)	Packaging ToritBaghouse
Bag Splitters (Treated/Untreated)	Packaging ToritBaghouse



3. P901, Soybean and Wheat Receiving, Transfer, and Storage

Operations, Property and/or Equipment Description:

This emissions unit is comprised of the following equipment: Dump Pit (via hopper truck), Enclosed Internal Transfer, North & South Bulk Storage Bins

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)	<u>Fugitive emissions from the receiving operations:</u> 4.20 lbs of fugitive particulate emissions (PE) per hour and 4.60 tons of fugitive PE per year 0.94 lb of fugitive particulate matter 10 microns or less in size (PM ₁₀) per hour and 1.02 tons of fugitive PM ₁₀ per year Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a three-minute average. <u>Stack emissions from the receiving operations:</u> 0.08 lb of PE per hour and 0.09 ton of PE per year



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.02 lb of PM₁₀ per hour and 0.02 ton of PM₁₀ per year</p> <p>Visible PE from the stacks serving this emissions unit shall not exceed 0% opacity, as a six-minute average</p> <p><u>Enclosed Internal Transfer Operations:</u> 0.29 lb of PE per hour and 0.64 ton of PE per year</p> <p>0.16 lb of PM₁₀ per hour and 0.36 ton of PM₁₀ per year</p> <p>Visible PE from the stacks serving this emissions unit shall not exceed 0% opacity, as a six-minute average</p> <p><u>Bulk Storage Bins:</u> 0.12 lb of PE per hour and 0.13 ton of PE per year</p> <p>0.03 lb of PM₁₀ per hour and 0.03 ton of PM₁₀ per year</p> <p>Visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity as a six-minute average.</p> <p>See b)(2)a.</p>
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 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC rule 3745-17-07(B)	See b)(2)f.
g.	OAC rule 3745-17-08(B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. The legally and practically enforceable PM₁₀ emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) for the emissions that require control equipment.

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

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

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

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

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

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

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 emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).
- e. The visible emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).
- f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

- g. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

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. the use of a baghouse system, whenever these air contaminant sources are in operation, with a minimum control efficiency of 98%, by weight for PE;
- (2) The annual throughput to the Dump Pit and the North and South Bulk Storage Bins are 526,000 tons based on maximum capacity determined in accordance with U.S. EPA's 1995 PTE Guidance for Grain Handling Facilities.
- (3) The annual throughput of the Enclosed Internal Transfers is 1,051,200 tons based on maximum capacity determined in accordance with U.S. EPA's 1995 PTE Guidance for Grain Handling Facilities.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of throughput for this emissions unit (in tons per month and total tons, to date for the calendar year).
- (2) The permittee shall perform weekly 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. the total duration of any visible emissions incident; and
- c. any corrective actions taken to 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)(3)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the receiving operations of 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 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 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)(3)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in terms d)(2) and d)(3) above:
 - a. all events during which any visible emissions of fugitive dust were observed from the receiving bin operations;
 - b. all events during which any visible particulate emissions were observed from the stacks serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.
- (3) The above information shall be provided as an attachment to the PER. If there were no event(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.

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:

4.20 lbs fugitive PE per hour and 4.60 tons fugitive PE per year
0.94 lb fugitive PM₁₀ per hour and 1.02 tons fugitive PM₁₀ per year

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emission unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this emissions limitation.

*The potential to emit is based on multiplying the corresponding AP-42 emission factor of 0.035 lb PE/ton grain or 0.0078 lb PM₁₀/ton grain (Section 9.9.1 (3/2003)) by a maximum hourly throughput of 240 tons of grain where 50% of emissions are considered fugitive.

If required, compliance with the PE hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Method 5 of 40 CFR, Part 60, Appendix A. If required, compliance with the PM₁₀ hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

The annual emission limitations were developed by multiplying the corresponding AP-42 emission factor indicated above by the maximum annual throughput of 525,600 tons, 50% of emissions as fugitive and a conversion factor of 1 ton/2000 lbs. Therefore, provided compliance is shown with the annual throughput restriction, compliance with the annual emissions limitation shall be demonstrated.

b. Emission Limitation:

0.08 lb/hr, 0.09 ton/yrPE; 0.02 lb/hr, 0.02 ton/yr PM₁₀ from the non-fugitive receiving operations

0.29 lb/hr, 0.64 ton/yrPE; 0.16 lb/hr, 0.36 ton/yrPM₁₀ from grain transfer operations

0.12 lb/hr, 0.13 ton/yrPE; 0.03 lb/hr, 0.03 ton/yrPM₁₀ from bulk storage bin operation

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emission unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this emissions limitation.

*The potential to emit is based on multiplying a corresponding AP-42 emission factor (Section 9.9.1 (3/2003)) by a maximum hourly throughput of 240 tons of grain and 98% control efficiency. Note that the receiving operations are considered to be 50% captured with 98% control efficiency.

Equipment	PE Emission Factor PM₁₀ Emission Factor
Receiving operations	0.035 lb/ton 0.0078 lb/ton
Grain transfer operations	0.061 lb/ton 0.034 lb/ton
Bulk storage bin operations	0.025 lb/ton 0.0063 lb/ton

If required, compliance with the PE hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Method 5 of 40 CFR, Part 60, Appendix A. If required, compliance with the PM₁₀ hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

The annual emission limitations were developed by multiplying the corresponding AP-42 emission factor (Section 9.9.1 (3/2003)) by the maximum annual throughput as listed in c)(1)a., 98% control efficiency of the baghouse[50% of emissions are considered captured for receiving operations] and a conversion factor of 1 ton/2000 lbs. Therefore, provided compliance is shown with the annual throughput restriction, compliance with the annual emissions limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

Visible

fugitive particulate emissions from this emissions unit shall not exceed 20% 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).

g) Miscellaneous Requirements

- (1) The permittee has committed to using a baghouse control system that has at least 98% control efficiency of PE. Any baghouse control system can be replaced with another control system that is as efficient provided that prior notification is made to the Director (the Northwest District Office). The following table details the existing control equipment:

Equipment	Control Equipment ID(s)
Receiving Operations	General Dust Collector 76000
Enclosed Transfer Operations	General Dust Collector 76000 or Red Dust Filter 76700
Bulk Storage Bins Operation	General Dust Collector 76000



4. P902, Discard Bins and Discard Bin Loadouts

Operations, Property and/or Equipment Description:

Discard Bin Loadouts, equipped with a dust sock and uncontrolled emissions from discard bins

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)	<p><u>Discard Bin Loadouts:</u> 12.90 lbs of fugitive particulate emissions (PE) per hour and 11.30 tons of fugitive PE per year</p> <p>4.35 lbs of fugitive particulate matter 10 microns or less in size (PM₁₀) per hour and 3.81 tons of fugitive PM₁₀ per year</p> <p>Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a three-minute average.</p> <p><u>Discard Bins:</u> 0.75 lb of PE per hour and 3.29 tons of PE per year</p> <p>0.19 lb of PM₁₀ per hour and 0.83 ton of PM₁₀ per year</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Visible PE from any stack serving this emissions unit shall not exceed 10% opacity as a six-minute average. See b)(2)a.
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 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

- a. The legally and practically enforceable PM₁₀ emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F).
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

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

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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.

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

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 emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).
- e. The visible emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).
- f. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The annual throughput of the Discard Bin Loadout operations is limited to 262,000 tpy by an inherent process bottleneck.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of throughput for this emissions unit (in tons per month and total tons, to date for the calendar year).
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) 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 item (d)(2)d. above or continue the weekly 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 weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the loading operations of 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 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 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)(3)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term d)(2), d)(3) and d)(4) above:
- a. all events during which any visible particulate emissions were observed from the stack(s) serving this emissions unit;
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions;
 - c. all events during which any visible emissions of fugitive dust were observed from the loading operations; and
 - d. any corrective actions taken to minimize or eliminate the visible fugitive emissions.
- (3) The above information shall be provided as an attachment to the PER. If there were no event(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.
- 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:
12.90 lbs/hr, 11.30 tons/yr fugitive PE; 4.35 lbs/hr, 3.81 tons/yr fugitive PM₁₀ from the discard bin loadouts
- Applicable Compliance Method:
The hourly emission limitation represents the potential to emit* of the emission unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this emissions limitation.
- *The potential to emit is based on multiplying the corresponding AP-42 emission factor of 0.086 lb PE/ton grain or 0.029 lb PM₁₀/ton grain (Section 9.9.1 (3/2003)) by a maximum hourly throughput of 150 tons of grain.
- If required, compliance with the PE hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Method 5 of 40 CFR, Part 60, Appendix A. If required, compliance with the PM₁₀ hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.
- The annual emission limitations were developed by multiplying the corresponding AP-42 emission factor indicated above by the maximum annual throughput of 262,800 tons and a conversion factor of 1 ton/2000 lbs. Therefore, provided

compliance is shown with the annual throughput restriction, compliance with the annual emissions limitation shall be demonstrated.

- b. Emission Limitation: Visible fugitive PE shall not exceed 20% opacity, as a three minute average, during loading operations

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emission Limitation: 0.75 lb/hr, 3.29 ton/yr PE; 0.19 lb/hr, 0.83 ton/yr PM₁₀ from the discard bins

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emission unit. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this emissions limitation.

*The potential to emit is based on multiplying the corresponding AP-42 emission factor of 0.025 lb PE/ton grain or 0.0063 lb PM₁₀/ton grain (Section 9.9.1 (3/2003)) by a maximum hourly throughput of 30 tons of grain.

If required, compliance with the PE hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Method 5 of 40 CFR, Part 60, Appendix A. If required, compliance with the PM₁₀ hourly emissions limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

The annual emission limitations were developed by multiplying the corresponding AP-42 emission factors indicated above by the maximum annual throughput of 262,800 tons and a conversion factor of 1 ton/2000 lbs. Therefore, provided compliance is shown with the annual throughput restriction, compliance with the annual emissions limitation shall be demonstrated.

- d. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- g) Miscellaneous Requirements

(1) None.