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

Certified Mail

8/9/2012

Mr. Duane Staats
TOWN & COUNTRY CO-OP
489 North Main Street
Mansfield, OH 44903

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0370010296
Permit Number: P0110604
Permit Type: Administrative Modification
County: Richland

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)352-8461or 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: Ohio EPA-NWDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
TOWN & COUNTRY CO-OP

Facility ID:	0370010296
Permit Number:	P0110604
Permit Type:	Administrative Modification
Issued:	8/9/2012
Effective:	8/9/2012
Expiration:	1/13/2019

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
TOWN & COUNTRY CO-OP

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Authorization

Facility ID:	0370010296
Application Number(s):	M0001844
Permit Number:	P0110604
Permit Description:	Administrative Modification to increase the hours of operation and throughput for Grain Dryer F009.
Permit Type:	Administrative Modification
Permit Fee:	$375.00
Issue Date:	8/9/2012
Effective Date:	8/9/2012
Expiration Date:	1/13/2019

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

TOWN & COUNTRY CO-OP
489 NORTH MAIN STREET
Mansfield, OH 44903

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: P0110604
Permit Description: Administrative Modification to increase the hours of operation and throughput for Grain Dryer F009.

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

Emissions Unit ID:	**F009**
Company Equipment ID:	F009
Superseded Permit Number:	P0109751
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 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 Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[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. F009, F009

Operations, Property and/or Equipment Description:

Grain Dryer

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	4.01 tons fugitive particulate matter 10 microns or less in size (PM10)/yr 3.91 lb of nitrogen oxides (NOx)/hr; 7.05 tonsNOx/year (from the combustion of natural gas) 3.28 lb of carbon monoxide (CO)/hr; 5.90 tons CO/yr (from the combustion of natural gas) Visible fugitive particulate emissions (PE) shall not exceed 10% opacity, as a three-minute average from the grain dryer. See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	See b)(2)d.
e.	OAC rule 3745-17-07(B)	See b)(2)d.
f.	40 CFR, Part 60, Subpart DD	See b)(2)e.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1).

i. 4.01 tons of fugitive PM10 per year;

ii. visible fugitive PE shall not exceed 10% opacity, as a three-minute average from the grain dryer; and

iii. 3.91 lb of NOx/hr; 7.05 tonsNOx/year

iv. 3.28 lb of CO/hr; 5.90 tons CO/yr

b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

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

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) shall not apply to the PM10, CO and NOx emissions from this air contaminant source since the calculated annual emission rate for PM10, CO and NOxare less than 10tons/year.

d. The emissions limitations and control measures specified by these rules are less stringent than the emissions limitations and control measure requirements established pursuant to OAC rule 3745-31-05(F).

e. The requirements of this rule are equivalent to or less stringent than the requirements established under OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE: [See b)(2)a.]

a. The perforation plate hole diameter shall not exceed 0.078 inches.

b. The maximum operating hours for the grain dryer shall not exceed 3,600 hours per year.

c. The maximum annual grain throughput shall not exceed 145,800 tons.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. the grain throughput, in tons per month,

b. the total grain throughput, in tons, for the calendar year.

c. the hours of operation for each month, and

d. the total hours of operation, to date, for the calendar month.

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) Pursuant to 40 CFR Part 60, Subpart A, Standards of Performance for New Stationary Sources – General Provisions (section 60.7), the permittee is hereby advised of the requirements to report the following at the appropriate times for the 39.953 mmBtu/hr Grain Dryer:

a. construction date (no later than 30 days after such date);

b. actual start-up date (within 15 days after such date); and

c. date of performance testing (if required, at least 30 days prior to testing).

(3) In conjunction with the reporting requirements contained in e)(3), the permittee shall submit the following notifications at the appropriate times for this emissions unit:

a. a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice; and

b. A notification of the anticipated date for conducting the opacity observations required by §60.11(e)(1) of 40 CFR Part 60, Subpart A. The notification shall also include, if appropriate, a request for the Administrator to provide a visible emissions reader during a performance test. The notification shall be postmarked not less than 30 days prior to such date.

Reports are to be sent to:

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

f) Testing Requirements

(1) Compliance with the 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. <u>Emissions Limitation:</u>

4.01 tons fugitive PM10/year

Applicable Compliance Method:

The annual PM10 emission limitation was developed by multiplying the maximum grain throughput of 145,800 tons/year by 0.055 lb PM10/ton of grain [AP-42, Section 1.4, Table 1.4-1 (revised 7/98)], then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput restriction, compliance with the annual PM10 emission limitation shall also be demonstrated.

b. Emission Limitations:

3.91 lbsNOx/hr; 7.05 tonsNOx/year

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum hourly gas burning capacity by an emission factor of 39.953mmBtu/hr by 0.098 lbNOx/mmBtu [AP-42, Section 1.4, Table 1.4-1 (revised 7/98)].

If required, compliance with the NOx limitation listed above shall be determined in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

The annual NOxemission limitation was developed by multiplying the maximum hourly gas burning capacity by the emission factor of39.953 mmBtu/hr by 0.098 lbNOx/mmBtu [AP-42 Section 1.4, Table 1.4-1 (revised 7/98)] and a maximum operational schedule of 3600 hours, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitations:

3.28 lbs CO/hr; 5.90 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum hourly gas burning capacity of 39.953mmBtu/hr byan emission factor of 0.082lbCO/mmBtu [AP-42, Section 1.4, Table 1.4-1 (revised 7/98)].

If required, compliance with the CO limitation listed above shall be determined in accordance with Test Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

The annual COemission limitation was developed by multiplying the maximum hourly gas burning capacity of 39.953mmBtu/hr byan emission factor of 0.082lbCO/mmBtu [AP-42, Section 1.4, Table 1.4-1 (revised 7/98)] and a maximum operational schedule of 3600 hours, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitations:

Visible fugitive PE shall not exceed 10% opacity, as a three-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.