



Environmental  
Protection Agency

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

8/21/2012

Mr. Michael Lake  
THE MENNEL MILLING CO  
128 W. Crocker Street  
Fostoria, OH 44830

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0332020069  
Permit Number: P0110359  
Permit Type: Initial Installation  
County: Hancock

Certified Mail

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

Dear Permit Holder:

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

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

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

If you have any questions, please contact 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](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
THE MENNEL MILLING CO**

Facility ID:	0332020069
Permit Number:	P0110359
Permit Type:	Initial Installation
Issued:	8/21/2012
Effective:	8/21/2012
Expiration:	2/27/2022





Division of Air Pollution Control
Permit-to-Install and Operate
for
THE MENNEL MILLING CO

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## Authorization

Facility ID: 0332020069  
Application Number(s): A0045035  
Permit Number: P0110359  
Permit Description: Initial Installation PTIO for Truck Receiving with Transferring, Conveying, and Storage (P903), Screening and Cleaning with Transferring and Conveying (inclusive of 200 headhouse) (P904) and Railcar Unloading (associated with 200 headhouse) (P906)  
Permit Type: Initial Installation  
Permit Fee: \$3,200.00  
Issue Date: 8/21/2012  
Effective Date: 8/21/2012  
Expiration Date: 2/27/2022  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

THE MENNEL MILLING CO  
VINE & FINDLAY ST  
Fostoria, OH 44830

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

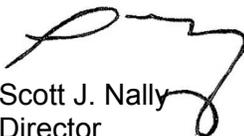
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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: P0110359

Permit Description: Initial Installation PTIO for Truck Receiving with Transferring, Conveying, and Storage (P903), Screening and Cleaning with Transferring and Conveying (inclusive of 200 headhouse) (P904) and Railcar Unloading (associated with 200 headhouse) (P906)

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

**Group Name: P903, P904, and P906**

<b>Emissions Unit ID:</b>	<b>P903</b>
Company Equipment ID:	Truck Receiving with Transferring, Conveying, and Storage
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P904</b>
Company Equipment ID:	200 headhouse
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P906</b>
Company Equipment ID:	Railcar Loadout
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 submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

## **B. Facility-Wide Terms and Conditions**

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

## **C. Emissions Unit Terms and Conditions**

**1. Emissions Unit Group -P903, P904, and P906: P903,P904,P906,**

EU ID	Operations, Property and/or Equipment Description
P903	Truck Receiving with Transferring, Conveying, and Storage
P904	Screening and Cleaning with Transferring and Conveying (inclusive of 200 House)
P906	Railcar Unloading (associated with 200 House)

Truck Receiving, Railcar Unloading, Transferring and Conveying, Screening and Cleaning with elevator bin storage and associated filters

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

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

a. b)(1)c. and b)(2)c.

(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><b>P903:</b></p> <p>0.01 grains particulate matter 10 microns or less in size (PM<sub>10</sub>)/dry standard cubic feet (dscf), 3.75 tons PM<sub>10</sub>/year from the Kicebaghouse stack serving emission unit P903</p> <p>1.53 tons of fugitive PM<sub>10</sub>/year from the truck receiving operations associated with emission unit P903</p> <p>Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the Kicebaghouse stack serving emission unit P903</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible fugitive PE shall not exceed 5% opacity, as a six-minute average from the truck receiving operations associated with emission unit P903</p> <p>Visible fugitive PE shall not exceed 0% opacity as a six-minute average from the transferring and conveying operations associated with emission unit P903</p> <p><b>P904 and P906:</b></p> <p>0.01 grains PM<sub>10</sub>/dry standard cubic feet, 5.63 tons PM<sub>10</sub>/year from the MAC baghouse stack serving emission units P904 and P906</p> <p>0.66 ton of fugitive PM<sub>10</sub>/year from emission unit P906</p> <p>Visible PE shall not exceed 0% opacity, as a six-minute average from the MAC baghouse stack serving emission units P904 and P906</p> <p>Visible fugitive PE shall not exceed 0% opacity, as a six-minute average from the screening, cleaning, transferring and conveying operations associated with emission unit P904</p> <p>Visible fugitive PE shall not exceed 5% opacity, as a six-minute average from emission unit P906</p> <p>See b)(2)a., b)(2)h., b)(2)i., c)(1) and c)(2)</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	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)d.
f.	40 CFR Part 60 Subpart DD	See b)(2)e.
g.	OAC rule 3745-17-07(B)	See b)(2)f.
h.	OAC rule 3745-17-08(B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(1):
- i. 0.01 grains PM<sub>10</sub>/dry standard cubic feet, 3.75 tons PM<sub>10</sub>/year from the Kicebaghouse stack serving emission unit P903;
  - ii. 1.53 tons of fugitive PM<sub>10</sub>/year from the truck receiving operations associated with emission unit P903;
  - iii. Visible PE shall not exceed 0% opacity, as a six-minute average from the Kicebaghouse stack serving emission unit P903;
  - iv. Visible fugitive PE shall not exceed 5% opacity, as a six-minute average from truck receiving operations associated with emission unit P903;
  - v. Visible fugitive PE shall not exceed 0% opacity as a six-minute average from the transferring and conveying operations associated with emission unit P903;
  - vi. 0.01 grains PM<sub>10</sub>/dry standard cubic feet, 5.63 tons PM<sub>10</sub>/year from the MAC baghouse stack serving emission units P904 and P906;
  - vii. 0.66 ton of fugitive PM<sub>10</sub>/year from emission unit P906;
  - viii. Visible PE shall not exceed 0% opacity, as a six-minute average from the MAC baghouse stack serving emission units P904 and P906;
  - ix. Visible fugitive PE shall not exceed 0% opacity, as a six-minute average from the screening, cleaning, transferring and conveying operations associated with emission unit P904; and
  - x. Visible fugitive PE shall not exceed 5% opacity, as a six-minute average from emission unit P906.
- 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.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM<sub>10</sub> 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 limitation specified by this rule is less stringent than the emission limitation established under OAC rule 3745-31-05(F).
- e. The provisions of 40 CFR Part 60 Subpart DD apply to the following operations (identified as affected facilities in 40 CFR 60.300) of this emissions unit based on construction/modification date of affected facility:
  - i. railcar unloading (P906);
  - ii. grain receiving and transferring/conveying operations (P903); and
  - iii. grain screening and cleaning operations (P904).

The emission limitations specified by this rule are equivalent to or less stringent than the emission limitations established under OAC rule 3745-31-05(F).

- f. This emissions unit is exempt from the visible emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- g. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- h. Fugitive emissions from the transferring and conveying and storage silos operations associated with emission unit P903, are considered negligible based

upon the use of a pneumatic conveying system and associated filter and egress point; therefore, no emission limitation will be established.

- i. Fugitive emissions from the screening/cleaning operations associated with emission unit P904, are considered negligible based upon the pneumatic conveying system, total enclosure of this emission unit, and associated filter and egress point; therefore, no emission limitation will be established.

c) Operational Restrictions

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

- a. Truck receiving, transferring and conveying, and storage operations associated with emission unit P903 shall be vented to the Kice baghouse capable of achieving a maximum outlet concentration not to exceed 0.01 grPM<sub>10</sub>/dscf.
- b. Railcar unloading operations, emission unit P906, and screening/cleaning operations, emission unit P904, associated with the 200 House operations shall be vented to the MAC baghouse capable of achieving a maximum outlet concentration not to exceed 0.01 grPM<sub>10</sub>/dscf.
- c. The maximum throughput for truck grain receiving operations associated with emission unit P903 shall not exceed 319,923 tons of grain per year.
- d. The maximum throughput for railcar unloading operations associated with emission unit P906 shall not exceed 167,967 tons of grain per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of material throughput for each of the following individual operations for this emissions unit, in tons per month and total tons, to date, for the calendar year:

- a. throughput for truck grain receiving operations associated with emission unit P903; and
- b. throughput for railcar unloading operations associated with emission unit P906.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the following for this emissions unit:

- a. the truck receiving operations associated with emission unit P903; and
- b. railcar unloading operations associated with emission unit P906.

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

- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall perform daily checks, when the emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving the following emissions units:
- a. the Kicebaghouse servicing emission unit P903; and
  - b. the MAC baghouse servicing emission unit P904 and P906.

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

- c. the color of the emissions;
  - d. whether the emissions are representative of normal operations;
  - e. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - f. the total duration of any visible emission incident; and
  - g. 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 additionally identify the following information in the annual PER in accordance with the monitoring requirements in sections d)(2) and d)(3) above:
- a. for the truck receiving associated with emission unit P903 and railcar unloading operations associated with emission unit P906:
    - i. all days during which any visible fugitive particulate emissions were observed from the truck receiving operations associated with emission

unit P903 or railcar unloading operations associated with emission unit P906 (identify the specific emission unit that experienced visible emissions); and

- ii. any corrective actions taken to eliminate the visible fugitive particulate emissions.
- b. for the Kice associated with emission unit P903 and MAC baghouses associated with emission units P904 and P906:
- i. all days during which any visible particulate emissions were observed from the stacks serving these baghouses (identify the specific dust collector that experienced visible emissions); and
  - ii. any corrective actions taken to eliminate the visible particulate emissions.

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

- (3) 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 affected facilities associated with emission units P903, P904, and P906:
- 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).
- (4) In conjunction with the reporting requirements contained in e)(3), the permittee shall submit the following notifications at the appropriate times for the affected facilities associated with emission units P903, P904, and P906:
- 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 Emission Limitation 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

0.01 gr PM<sub>10</sub>/dscf, 3.75 tons PM<sub>10</sub>/year from the Kicebaghouse stack serving emission unit P903

Applicable Compliance Method

The maximum outlet concentration for the baghouse serving this emissions unit has been determined to be 0.01 gr PM<sub>10</sub>/dscf. If required, compliance shall be determined in accordance with Methods 1 through 4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of Ohio EPA, Northwest District Office.

The annual limitation was established by multiplying the outlet grain loading of 0.01 gr PM<sub>10</sub>/dscf by a maximum volumetric air flow of 10,000 acfm, applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, and 60 minutes/hr, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the outlet grain loading limitation, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitation

1.53 tons of fugitive PM<sub>10</sub>/year from the truck receiving operations associated with emission unit P903

Applicable Compliance Method

The annual fugitive PM<sub>10</sub> limitation was established by multiplying the maximum annual grain throughput of 391,923 tons grain/year by an emission factor of 0.0078 lb of PM<sub>10</sub>/ton of grain (AP-42 Table 9.9.1-1 [3/03]), then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput restriction, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation

Visible PE shall not exceed 0% opacity, as a six-minute average from the Kicebaghouse stack serving emission unit P903

Applicable Compliance Method

Compliance with the visible emission limitation listed above shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in 40 CFR, Part 60, Subpart DD [See f)(2)].

d. Emission Limitation

Visible fugitive PE shall not exceed 5% opacity, as a six-minute average from the truck receiving operations associated with emission unit P903

Applicable Compliance Method

Compliance with the visible emission limitation listed above shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in 40 CFR, Part 60, Subpart DD [See f)(2)].

e. Emission Limitation

Visible fugitive PE shall not exceed 0% opacity as a six-minute average from the transferring and conveying operations associated with emission unit P903

Applicable Compliance Method

Compliance with the visible emission limitation listed above shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in 40 CFR, Part 60, Subpart DD [See f)(2)].

f. Emission Limitation

0.01 grains PM<sub>10</sub>/dry standard cubic feet, 5.63 tons PM<sub>10</sub>/year from the MAC baghouse stack serving emission units P904 and P906

Applicable Compliance Method

The maximum outlet concentration for the baghouse serving this emissions unit has been determined to be 0.01 gr PM<sub>10</sub>/dscf. If required, compliance shall be determined in accordance with Methods 1 through 4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of Ohio EPA, Northwest District Office.

The annual limitation was established by multiplying the outlet grain loading of 0.01 gr PM<sub>10</sub>/dscf by a maximum volumetric air flow of 15,000 acfm, applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, and 60

minutes/hr, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the outlet grain loading limitation, compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation

0.66 ton of fugitive PM<sub>10</sub>/year from emission unit P906

Applicable Compliance Method

The annual fugitive PM<sub>10</sub> limitation was established by multiplying the maximum annual grain throughput of 167,967 tons grain/year by an emission factor of 0.0078 lb of PM<sub>10</sub>/ton of grain (AP-42 Table 9.9.1-1 [3/03]), then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual grain throughput restriction, compliance with the annual emission limitation shall also be demonstrated.

h. Emission Limitation

Visible PE shall not exceed 0% opacity, as a six-minute average from the MAC baghouse stack serving emission units P904 and P906

Applicable Compliance Method

Compliance with the visible emission limitation listed above shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in 40 CFR, Part 60, Subpart DD [See f)(2)].

i. Emission Limitation

Visible fugitive PE shall not exceed 0% opacity, as a six-minute average from the screening, cleaning, transferring and conveying operations associated with emission unit P904

Applicable Compliance Method

Compliance with the visible emission limitation listed above shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in 40 CFR, Part 60, Subpart DD [See f)(2)].

j. Emission Limitation

Visible fugitive PE shall not exceed 5% opacity, as a six-minute average from emission unit P906

Applicable Limitation

Compliance with the visible emission limitation listed above shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in 40 CFR, Part 60, Subpart DD [See f)(2)].

- (2) The permittee shall conduct, or have conducted, emission testing for all of the affected facilities associated with this emissions unit that are subject to 40 CFR, Part 60, Subpart DD.
- a. Testing shall be conducted in accordance with the provisions of 40 CFR, Part 60, Subpart A, section 60.8 and 40 CFR, Part 60, Subpart DD, section 60.303.
  - b. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, by no later than 180 days after initial startup of such facility and at such other times as may be required by the Ohio Environmental Protection Agency, Division of Air Pollution Control.
  - c. The emission testing shall be conducted to demonstrate compliance with the following emission limitations [The initial testing was completed on 8/1/12 and 8/2/12]:
    - i. No owner or operator subject to the provisions of 40 CFR, Part 60, Subpart DD shall cause to be discharged into the atmosphere from any affected facility any process emission which:
      - (a) Contains particulate matter in excess of 0.023 g/dscm (0.01 gr/dscf); and
      - (b) Exhibits greater than 0 percent opacity.
    - ii. No owner or operator subject to the provisions of 40 CFR, Part 60, Subpart DD shall cause to be discharged into the atmosphere any fugitive emission from:
      - (a) Any individual truck unloading station, railcar unloading station, or railcar loading station which exhibits greater than 5 percent opacity; and
      - (b) Any grain handling operation which exhibits greater than 0 percent opacity.
  - d. The permittee shall determine compliance with the particulate matter standards in 40 CFR 60.302 [See f)(2)c. for emission limitations] as follows:
    - i. Method 5 of 40 CFR, Part 60, Appendix A shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filterholder shall be operated without heaters.

- ii. Method 2 shall be used to determine ventilation volumetric flow rate.
  - iii. Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.
  - e. The test(s) shall be conducted as at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Northwest District Office. MSOR is defined as the condition that is most likely to challenge the emissions control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
  - f. No later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate DO or LAA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operation parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - g. Personnel from the appropriate DO or LAA shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - h. A comprehensive written report on the emission tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate DO or LAA within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate DO or LAA.
- g) Miscellaneous Requirements
- (1) None.