



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

1/31/2013

Melissa Farrington  
The Andersons, Inc.  
P.O. Box 119  
Maumee, OH 43537

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

Facility ID: 0448031076  
Permit Number: P0112212  
Permit Type: Initial Installation  
County: Lucas

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
TDES; Michigan; Indiana; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Andersons Inc. is a railcar repair facility located at 421 Illinois Avenue in Maumee, OH. This permit is for a new installation of three emissions units: K001 (Paint Booth and Curing Booth), P001 (Shot Blast Booth) that will blast and paint railcars. Dry filtration and an enclosed booth is used for particulate control of the shot blast booth and the VOC emissions are uncontrolled for the paint and curing booths. A baghouse is used for particulate control for the shot blast booth. Currently railcars are the only products to be blasted and painted at this location.

3. Facility Emissions and Attainment Status:

This facility will be a synthetic minor source for volatile organic compounds, a minor source for all other criteria pollutants and a minor source for HAPs.

Lucas County is designated attainment for all criteria pollutants.

4. Applicable Regulations:

Due to the synthetic minor limitation on volatile organic compounds, only state regulations and emission limitations applies to these emissions units.

<p>OAC rule 3745-31-05(A)(3), as effective 11/30/2001</p>	<p>BAT requirements. Per the July 2, 2010, Ohio EPA memo regarding <i>Permit Processing After U.S. District Court &lt;10 Ton/Yr Exemption Decision</i>, it is necessary to set a BAT limit under the 11/30/2001 BAT rule for pollutants emitted less than 10 tons per year, since U.S. EPA has not yet approved Ohio's July 2006 OAC rule 3745-31-05 rule revisions as part of Ohio's State Implementation Plan (SIP). In accordance with this memo, BAT will be established for PE in this permit as:</p> <p>K001: 1.97 lbs/hr and 3.80 TPY PE</p> <p>K001: visible particulate emissions from any stack shall not exceed 10% opacity, as a six-minute average</p> <p>P001: 0.51 lb/hr and 2.23 TPY PE</p>
<p>OAC rule 3745-31-05(F), as effective 12/1/2006</p>	<p>Once U.S. EPA approves the 12/01/2006 rule revision as part of Ohio's SIP, BAT requirements will no longer apply to PE, since controlled emissions are &lt; 10 tons/yr. Also the 10% opacity requirement for K001 will no longer apply.</p> <p>Voluntary restrictions for the purpose of avoiding BAT requirements.</p> <p>K001: Use of an airless spray system vented to a dry filtration system</p>



	<p>with a 98% control efficiency for particulate emissions.</p> <p>P001: Full enclosure vented to a fabric filter with 99% control efficiency for particulate emissions.</p>
OAC rule 3745-31-05(D)	<p>K001: Restrictions on paint and solvent usage that will be federally enforceable on this emissions unit K001 to avoid becoming a major source of HAPs. The combined VOC emissions from coatings and cleanup materials shall not exceed 55.10 tons per year as a rolling, 12-month summation of the monthly emissions, as applied.</p>
OAC rule 3745-31-05(F)	<p>Voluntary restrictions for the purpose of avoiding BAT requirements.</p> <p>K001: Use of an airless spray system vented to a dry filtration system with a 98% control efficiency for particulate emissions.</p> <p>P001: Full enclosure vented to a fabric filter with 99% control efficiency for particulate emissions.</p>
ORC rule 3704.03(T)	<p>BAT for sources having emissions greater than 10 tons/yr.</p> <p>K001: The VOC emission limitation established under this rule is equivalent to that established under OAC rule 3745-31-05(D) since the permittee has requested a federally enforceable limitation on potential to emit.</p>
OAC rule 3745-17-07(A)(1)	<p>K001: Exempt per OAC rule 3745-17-07(A)(3)(h).</p> <p>P001: Visible emissions from stacks: 20% opacity as a 6-minute average, unless otherwise specified by the rule</p>
OAC rule 3745-17-11(B)(1)	<p>K001: Exempt per OAC rule 3745-17-11(A)(1)(j) - surface coating processes that employ airless spray application methods.</p> <p>P001: 7.3 pounds per hour of particulate emissions based on Figure II, where the uncontrolled PE is 50.7 lbs per hour. <math>A = 0.5782 (50.7)^{0.6456} = 7.3</math> lbs PE/hr.</p>
OAC rule 3745-21-09(U)(1)(c)	<p>K001: 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coatings.</p>
ORC rule 3704.03(F)(4) and OAC rule 3745-114-01	<p>K001: Air Toxics Policy applies for air toxics greater than 1 TPY.</p>
40 CFR Part 63, subpart HHHHHH	<p>K001: In accordance with 40 CFR 63.11169(c), this GACT is not applicable because the facility does not spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.</p> <p>The facility confirmed this through their MSDS sheets.</p>



5. Source Emissions:

Emissions Unit P001 (shot blast booth):

The Shot Blast Booth is designed to accommodate up to four shot blast machines. Steel shot is used as the abrasive in the dry blaster. Emissions will be particulate emissions (PE) from the shot blasting operations. The doors to the shot blast booth are equipped with safety interlock switches to prevent operation of the blast booth if the doors are open. The doors are also fully gasketed to provide a dust tight seal and prevent abrasive carryout from the blast exposure. The emissions capture is reported to be 100%. The exhaust of the dust collector (99% efficiency) for the Shot Blast Booth is recirculated to the warehouse building. The stack emissions will be monitored from inside the building where they exit into the warehouse building. Due to having 100% capture, fugitive emissions are not expected.

Emissions Unit K001 (paint spray booth and curing booth):

NOTE: the application had the spray booth and curing booth as separate emissions units but since all the railcars go from the spray booth to the curing booth, this will be considered as one process, therefore, one emissions unit.

The Paint Booth includes two 2.0 mmBtu/hr direct-fired, natural gas burners. Installation of the burners is for the purpose of maintaining the booth at optimum coat spraying temperatures (60°-70°F). The burners are exempt per OAC rule 3745-31-03(A)(1)(a), therefore the burner emissions will not be considered in the permit allowable, however, the combustion calculations will be documented in this write-up. The paint spray booth will have particulate emissions (PE), volatile organic compound (VOC) emissions and combined hazardous air pollutant (HAP) emissions. The primary coatings employed are considered "Extreme Performance Coatings" as defined in OAC rule 3745-21-01(D)(76). The coatings are thinned at the facility before application and are expected to have 40% transfer efficiency. The paint booth employs passive filters to control PE with 98% efficiency.

The Curing Booth includes one 2.5 mmBtu/hr direct-fired, natural gas burner. The burner is exempt per OAC rule 3745-31-03(A)(1)(a), therefore the burner emissions will not be considered in the permit allowable, however, the combustion calculations will be documented in this write-up (see the Combustion spreadsheet). Besides the burner emissions, the curing booth will have volatile organic compound (VOC) emissions and combined hazardous air pollutant (HAP) emissions.

All calculations for air emissions are in the spreadsheet created by TES and will be uploaded to STARS2. A summary table is provided below for the permit allowable emission limitations:

The facility voluntarily requested a capped usage rate for the paint of 14 gallons/hr and 54,000 gallons per year along with a 3 gallons/hr and 3,600 gallons of solvent to avoid becoming a major source for HAPs. Rather than using those restrictions in the permit, a Federally Enforceable VOC limit of 55.1 tons per year as a rolling, 12-month summation of the monthly emissions was given the facility along with the OAC 3745-21-09(U)(1)(c) limit of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents. The annual VOC emissions limit was what the facility requested for this emissions unit basing their calculations on the above information while using representative material properties (averages) of the various coatings to calculate the emissions limit. (i.e., for coatings: density of 11.89 lbs/gal, VOC content of 1.59 lbs/gal, 0.50 lb/gal of HAP, 11.74 lb/gal solids content and for solvents: density of 6.76 lbs/gal, VOC content of 6.76 lbs/gal).



Emission Unit	Booths	Emissions			
		PE/PM10/P2.5		VOC	
		(lb/hr)	(TPY)	(lb/gal)	(TPY)
P001	Shot Blast Booth	0.51	2.23	---	---
K001	Paint and Curing Booths	1.97	3.80	3.5	55.1
<b>PERMIT ALLOWABLES</b>		2.48	6.03	3.5	55.1

HAP and Air Toxics Discussion:

The facility based their HAP emissions on the HAPS in the paints. The guidelines used were Ohio EPA's Engineering Guide #69 and the Air Toxics Policy. The facility had 4 HAPs (air toxics) that had potential emissions higher than Ohio EPA's modeling threshold of 1 ton per year: Ethyl Benzene, Toluene, Xylene and Methyl Isobutyl Ketone. The worst-case scenario HAP that was modeled was Xylene. The facility used the screening model AERSCREEN which is based on AERMOD. The results indicate the actual ambient impacts were considerably less than then MAGLC. See the HAP calculation spreadsheet for further details.

6. Conclusion:

This new installation permit action should be issued as a draft permit to ensure federal enforceability on the VOC emissions.

7. Please provide additional notes or comments as necessary:

None

8. Total Permit Allowable Emissions Summary (for informational purposes only):

(Note: the HAPs are listed in the summary below but are not limits in the permit.)

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	6.03
VOC	55.1
HAPs	13.52

PUBLIC NOTICE

1/31/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

The Andersons, Inc.

421 Illinois Ave,

Maumee, OH 43537

Lucas County

FACILITY DESC.: Support Activities for Rail Transportation

PERMIT #: P0112212

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of a paint and blast facility at the Railcar Repair Shop.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Mary Lehman-Schmidt, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
The Andersons, Inc.**

Facility ID:	0448031076
Permit Number:	P0112212
Permit Type:	Initial Installation
Issued:	1/31/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
The Andersons, Inc.

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**Draft Permit-to-Install and Operate**

The Andersons, Inc.

**Permit Number:** P0112212

**Facility ID:** 0448031076

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0448031076  
Application Number(s): A0046316  
Permit Number: P0112212  
Permit Description: Installation of a paint and blast facility at the Railcar Repair Shop.  
Permit Type: Initial Installation  
Permit Fee: \$950.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 1/31/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

The Andersons, Inc.  
421 Illinois Ave  
Maumee, OH 43537

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

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



**Draft Permit-to-Install and Operate**

The Andersons, Inc.

**Permit Number:** P0112212

**Facility ID:** 0448031076

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0112212

Permit Description: Installation of a paint and blast facility at the Railcar Repair Shop.

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

**Emissions Unit ID:**

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

**K001**

Paint Booth #1

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

**P001**

Shot Blast Booth #1

Not Applicable



**Draft Permit-to-Install and Operate**

The Andersons, Inc.

**Permit Number:** P0112212

**Facility ID:** 0448031076

**Effective Date:** To be entered upon final issuance

## **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 Toledo Department of Environmental Services 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.



**Draft Permit-to-Install and Operate**

The Andersons, Inc.

**Permit Number:** P0112212

**Facility ID:** 0448031076

**Effective Date:** To be entered upon final issuance

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



**Draft Permit-to-Install and Operate**

The Andersons, Inc.

**Permit Number:** P0112212

**Facility ID:** 0448031076

**Effective Date:** To be entered upon final issuance

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.



**Draft Permit-to-Install and Operate**

The Andersons, Inc.

**Permit Number:** P0112212

**Facility ID:** 0448031076

**Effective Date:** To be entered upon final issuance

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



**1. K001, Paint Booth #1 and Curing Booth #1**

**Operations, Property and/or Equipment Description:**

Railcar paint booth with two 2.0 mmBtu/hr burners and a curing booth with one 2.5 mmBut/hr burner.

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)b., b)(1)g., b)(2)b., b)(2)c., d)(3), d)(4), d)(5), d)(6), and e)(4)

(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)(2)(d), b)(2)e., d)(2), e)(2), f)(1)e.

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(A)(3), as effective 11/30/2001	1.97 lb/hr and 3.80 ton per year of particulate emissions (PE);  visible particulate emissions from any stack shall not exceed 10% opacity, as a six-minute average  See b)(2)a.
b.	OAC rule 3745-31-05(F), as effective 12/1/2006	See b)(2)b. and b)(2)c.
c.	ORC 3704.03(T)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(D).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D) (voluntary restriction to avoid exceeding 25 tons per year of combined hazardous air pollutants (HAPs))	The combined volatile organic compounds (VOC) emissions from coatings and cleanup materials shall not exceed 55.1 tons per year as a rolling, 12-month summation of the monthly emissions.  See b)(2)e. and d)(2)
e.	OAC rule 3745-17-11(A)(1)	Exempt, See b)(2)d.
f.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coatings
g.	ORC rule 3704.03(F)(4)(d) and OAC rule 3745-114-01	Air Toxics Policy  See d)(4)

(2) Additional Terms and Conditions

a. 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.

b)(1)a., f)(1)b. and f)(1)c.

b. 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. Therefore, the BAT requirements of OAC rule 3745-31-05 of term b(1)a. would not apply to particulate emissions since the controlled potential to emit will be less than 10 tons per year.

c. In accordance with the permit application, the permittee has committed to the following:



- i. operation of the passive filters whenever this emissions unit is in operation when surface paint coatings that employ airless spray application methods. The passive filter provides 98% efficiency and the coating process assumes 40% transfer efficiency.
- d. This emissions unit is exempt from the requirements of OAC rule 3745-17-11 pursuant to OAC rule 3745-17-11(A)(1)(j).
- e. The maximum coatings and cleanup materials usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$55.1 \text{ tons VOC} \geq \sum_{i=1}^n (CCM_i) (VOC_i) \div (2000 \text{ lbs/ton})$$

Where:

CCM<sub>i</sub> = usage of coating and/or cleanup material, *i*, gallons

VOC<sub>i</sub> = volatile organic compound content of material, *i*, pounds per gallon

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	5
1-2	10
1-3	15
1-4	20
1-5	25
1-6	30
1-7	35
1-8	40
1-9	45
1-10	50
1-11	55
1-12	55.1



c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of compliance with the emissions limitation for material applied to miscellaneous metal parts (3.5 pounds of VOC per gallon, excluding water and exempt solvents), the permittee shall collect and record on a monthly basis the following information:
  - a. The name and identification number of coating applied; and
  - b. The VOC content as applied, excluding water and exempt solvents of each coating applied.
- (2) For purposes of compliance with the rolling, 12-month VOC emission limitation for coatings and cleanup materials (55.1 tons), the permittee shall collect and record on a monthly basis the following information for this emissions unit:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed, (CCM<sub>i</sub>);
  - c. the volatile organic compound content of each coating and cleanup material employed, in pounds per gallon as applied, (VOC<sub>i</sub>);
  - d. the total VOC emissions from all coatings and cleanup materials employed, in tons, is calculated by using the formula as specified in b)(2)e.; and
  - e. the rolling, 12-month VOC emissions, in tons.
- (3) The PTIO application for this emissions unit, K001, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been



documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene as the worst-case toxic modeled.

TLV (mg/m<sup>3</sup>): 435

Maximum Hourly Emission Rate (lbs/hr): 4.23

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 10,357

MAGLC (ug/m<sup>3</sup>): 118

The permittee, has demonstrated that emissions of xylene, from emissions unit K001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:



- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Toledo Division of Environmental Services) of any monthly record showing the use of a coating in this emissions unit which exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the combined VOC emissions from coatings and cleanup materials utilized in this emissions unit exceed the 55.1 tons per year as a rolling, 12-month summation of the monthly emissions. If not deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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



a. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emissions Limitation:

1.97 lb/hr of particulate emissions (PE)

Applicable Compliance Method:

The emission limitation was established to reflect the controlled potential to emit for this emissions unit, based on the worst-case operating scenario, as follows:

Compliance may be demonstrated through calculations performed as follows: multiply the maximum solids concentration (11.74 lbs/gal) by one minus the transfer efficiency (1-0.40) by one minus the control efficiency of the passive filtration system (1-0.98) by the maximum usage rate (14 gal/hr).

c. Emissions Limitation:

3.80 ton per year of particulate emissions (PE)

Applicable Compliance Method:

The emission limitation was established to reflect the controlled potential to emit for this emissions unit, based on the worst-case operating scenario, as follows:

Compliance may be demonstrated through calculations performed as follows: multiply the maximum solids concentration (11.74 lbs/gal) by one minus the transfer efficiency (1-0.40) by one minus the control efficiency of the passive filtration system (1-0.98) by the annual coating usage as recorded in d)(2) and then divide by 2,000 pounds per ton.

d. Emissions Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coatings

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping requirements specified in d)(1) of this permit.



If required, compliance, shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emissions Limitation:

The combined VOC emissions from coatings and cleanup materials shall not exceed 55.1 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2).

g) Miscellaneous Requirements

(1) None.



**2. P001, Shot Blast Booth #1**

**Operations, Property and/or Equipment Description:**

Four railcar shot blast machines in a booth with total enclosure and bag house, vents inside the warehouse building

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)b. 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(A)(3), as effective 11/30/2001	0.51 lb/hr and 2.23 ton per year of particulate emissions (PE)  See b)(2)a.
b.	OAC rule 3745-31-05(F), as effective 12/1/2006	See b)(2)b.and b)(2)c.
c.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule
d.	OAC rule 3745-17-11(B)(1)	7.3 lbs/hr particulate emissions  See b)(2)c.



(2) Additional Terms and Conditions

a. 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.

b)(1)a., f)(1)a. and f)(1)b.

b. 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. Therefore, the BAT requirements of OAC rule 3745-31-05 of term b(1)a. would not apply to particulate emissions since the controlled potential to emit will be less than 10 tons per year.

c. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit based on the worst case shot blast flow rate provided in the permittee's application, therefore, no hourly monitoring, recordkeeping, or reporting requirements are required. In accordance with the permit application, the permittee has committed to the following:

- i. full enclosure of the shot blasting booths with emissions vented to a baghouse having 99% control efficiency for particulate emissions whenever this emissions unit is in operation; and
- ii. a maximum shot blast flow rate of 1,393 pounds per hour for each of the four machines.

c) Operational Restrictions

(1) The shot blasting booths shall be fully enclosed when in operation, and the permittee shall operate the baghouse whenever this emission unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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) above or continue the daily 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.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



f) Testing Requirements

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

a. Emission Limitation:

0.51 lb/hr of particulate emissions from the dust collector stack (vented inside the warehouse building)

Applicable Compliance Method:

The hourly particulate emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the maximum abrasive flowrate (1393 lbs/hr \* 4 machines) by the AP-42 (table 13.2.6-1 (9/97)) emission factor (9.1 lbs PE/1000 lb abrasives) times the control equipment efficiency (1-0.99).

If required, the permittee shall perform emission testing in accordance with the requirements of 40 CFR 60, Appendix A, Method 5 and the methods and procedures of OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

2.23 tons per year of particulate emissions

Applicable Compliance Method:

The annual particulate emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance with the tons per year restriction is determined through the same calculation stated for the pound per hour above multiplied by 8,760 hours per year and divided by 2000 lbs. per ton. If compliance is demonstrated with the pound per hour limitation, then compliance is demonstrated with the ton per year limit.

i.e.:  $(1393 \text{ lbs/hr} * 4 \text{ machines}) * (9.1 \text{ lb PE/1000 lbs}) * (1-0.99) * (8760 \text{ hr/yr}) * (1 \text{ ton/2000 lbs}) = 2.23 \text{ TPY PE}$

c. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.



**Draft Permit-to-Install and Operate**

The Andersons, Inc.

**Permit Number:** P0112212

**Facility ID:** 0448031076

**Effective Date:** To be entered upon final issuance

d. Emission Limitation:

7.3 lbs/hr particulate emissions

Applicable Compliance Method:

Compliance with the hourly emission limitation may be demonstrated through calculations performed as follows: multiply the maximum abrasive flowrate (1393 lbs/hr \* 4 machines) by the AP-42 (table 13.2.6-1) emission factor (9.1 lbs PE/1000 lb abrasives) times the baghouse efficiency (1-0.99).

If required, the permittee shall perform emission testing in accordance with the requirements of 40 CFR 60, Appendix A, Method 5 and the methods and procedures of OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.