



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
PAULDING COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-16109

Fac ID: 0363000133

DATE: 8/19/2004

EMP Cooperative
Jack Helm
1519 Everson Rd
Woodburn, IN 46797

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/19/2004
Effective Date: 8/19/2004**

FINAL PERMIT TO INSTALL 03-16109

Application Number: 03-16109
Facility ID: 0363000133
Permit Fee: **\$5200**
Name of Facility: EMP Cooperative
Person to Contact: Jack Helm
Address: 1519 Everson Rd
Woodburn, IN 46797

Location of proposed air contaminant source(s) [emissions unit(s)]:
**215 North Main Street
Payne, Ohio**

Description of proposed emissions unit(s):
Truck and rail load out, roadways, grain dryer, receiving pits.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

EMP Cooperative
 PTI Application: 03-16109
 Issued: 8/19/2004

Facility ID: 0363000133

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	6.06

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Grain receiving by truck, transferring and conveying operations	OAC rule 3745-31-05(A)(3)	Control requirements (see A.2.a) <u>Grain receiving by truck:</u> 1.08 tons fugitive particulate emissions (PE) per year Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average <u>Transferring and Conveying:</u> 0.07 ton PE per year Visible fugitive PE shall not exceed 0% opacity, as a 3-minute average
	OAC rule 3745-17-07(B)	See A.2.b
	OAC rule 3745-17-08(B)	See A.2.c

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be:
 - i. Grain receiving: use of a three-sided enclosure on both receiving stations; and,

- ii. Transferring/conveying: total enclosure.

BAT requirements also include compliance with the terms and conditions of this permit.

- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c** EMP Cooperative 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. Operational Restrictions

- 1. The maximum annual grain throughput rate from emissions unit F001 shall not exceed 47,850 tons.

C. Monitoring and/or Record keeping Requirements

- 1. The permittee shall maintain monthly records of the amount of grain throughput for this emissions unit (in tons per month and total tons, to date for the calendar year).
- 2. 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 grain receiving stations and from transferring and conveying operations. 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. For grain receiving stations
 - i. The location and color of the emissions;
 - ii. Whether the emissions are representative of normal operations;
 - iii. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. The total duration of any visible emission incident; and,
 - v. Any corrective actions taken to minimize or eliminate the visible emissions.

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

- b. For transferring and conveying:
 - i. The color of the emissions;
 - ii. The total duration of any visible emission incident; and,
 - iii. Any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedance of the annual grain throughput limitation, as well as the corrective actions that were taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible fugitive particulate emissions were observed from the grain receiving stations, (b) identify all days during which any visible fugitive particulate emissions were observed from transferring and conveying operations and (c) describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions from the grain receiving stations and/or visible fugitive particulate emissions from transferring and conveying operations. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

Emissions Unit ID: F001

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in the Applicable Emissions Limitation section of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation

Grain Receiving: 1.08 tons fugitive PE/year

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying an AP-42 emission factor of 0.18 lbs PE/ton grain (Section 9.9.1 (3/2003)), a maximum annual grain throughput of 47,850 tons of grain, applying a control efficiency of 75% for a three-sided enclosure, and multiplying by a conversion factor of ton/2000 lbs. Therefore, provided compliance is shown with the maximum annual grain throughput restriction, compliance with the annual emission limitation will be assumed.

- b. Emission Limitation

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average from grain receiving

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- c. Emission Limitation

Transferring/Conveying: 0.07 ton fugitive PE/year

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying an AP-42 emission factor of 0.061 lb PE/ton grain (Section 9.9.1 (3/2003)), a maximum annual grain throughput of 47,850 tons of grain, applying a control efficiency of 95% for total enclosure, and multiplying by a conversion factor of ton/2000 lbs. Therefore, provided compliance is shown with the maximum annual grain throughput restriction, compliance with the annual emission limitation will be assumed.

- d. Emission Limitation

Visible fugitive PE shall not exceed 0% opacity, as a 3-minute average from transferring and conveying operations

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Grain loading into trucks	OAC rule 3745-31-05(A)(3)	0.23 ton fugitive particulate emissions (PE)/year Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average from truck loading operations
	OAC rule 3745-17-07(B)	See A.2.b
	OAC rule 3745-17-08(B)	See A.2.c

2. Additional Terms and Conditions

- 2.a BAT requirements include compliance with the terms and conditions of this permit.
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c EMP Cooperative 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. Operational Restrictions

1. The maximum annual grain throughput rate from emissions unit F002 shall not exceed 5,250 tons.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the amount of grain throughput for this emissions unit (in tons per month and total tons, to date for the calendar year).
2. 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 truck loading operations. 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:
 - i. The color and location of the emissions;
 - ii. Whether the emissions are representative of normal operations;
 - iii. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. The total duration of any visible emission incident; and,
 - v. Any corrective actions taken to eliminate the visible emissions.

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

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedance of the annual grain throughput limitation, as well as the corrective actions that were taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any

abnormal visible fugitive particulate emissions were observed from the truck loading operation and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in the Applicable Emissions Limitation section of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation
0.23 ton fugitive PE/year

Applicable Compliance Method

The emission limitation was established by multiplying an AP-42 emission factor of 0.086 lbs PE/ton grain (Section 9.9.1 (3/2003)) by a maximum annual grain throughput of 5,250 tons of grain, and multiplying by a conversion factor of ton/2000 lbs. Therefore provided compliance is shown with the maximum annual grain throughput, compliance with the annual limitation will be assumed.

- b. Emission Limitation
Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average, during truck loading operations

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - Grain loading into rail cars	ts	0.58 ton fugitive particulate emissions (PE)/year
	OAC rule 3745-31-05(A)(3)	Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average from rail car loading operations
		See A.2.b
	OAC rule 3745-17-07(B)	See A.2.c
	OAC rule 3745-17-08(B)	

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirements for emissions unit F003 includes compliance with the terms and conditions of this permit.
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c EMP Cooperative 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. Operational Restrictions

1. The maximum annual grain throughput for emissions unit F003 shall not exceed 42,600 tons.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the amount of grain throughput for this emissions unit (in tons per month and total tons, to date for the calendar year).
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 rail car loading operations. 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:
 - i. The color and location of the emissions;
 - ii. Whether the emissions are representative of normal operations;
 - iii. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. The total duration of any visible emission incident; and,
 - v. Any corrective actions taken to eliminate the visible emissions.

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

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedance of the annual grain throughput limitation, as well as the corrective actions that were taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the rail car loading operations and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in the Applicable Emissions Limitation section of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation
0.58 ton fugitive PE/year

Applicable Compliance Method
The emission limitation was established by multiplying an AP-42 emission factor of 0.027 lbs PE/ton grain (Section 9.9.1 (3/2003)) by a maximum annual grain throughput of 42,600 tons of grain, and multiplying by a conversion factor of ton/2000 lbs. Therefore, provided compliance is shown with the maximum annual grain throughput restriction, compliance with the annual emission limitation will be assumed.
 - b. Emission Limitation
Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average, from rail car loading operations

Applicable Compliance Method
If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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EMP (

PTI A

Issued: 8/19/2004

Emissions Unit ID: **F003**

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F004 - Grain dryer (maximum design capacity of 1,500 bushels per hour with a firing rate of 8.2 MMBtu/hr fueled by natural gas)	OAC rule 3745-31-05(A)(3)	Control requirements (see A.2.a)
		3.08 tons fugitive particulate emissions (PE)/year
		Visible fugitive PE shall not exceed 20% opacity as a 3-minute average
	OAC rule 3745-17-07(B)	See A.2.b
	OAC rule 3745-17-08 (B)	See A.2.c

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of column plate perforation with a diameter equal to or less than 0.094 inches. BAT requirements also include compliance with the terms and conditions of this permit.
- 2.b This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c EMP Cooperative is not located within an "Appendix A" area 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).

B. Operational Restrictions

1. The maximum annual throughput from emissions unit F004 shall not exceed 28,000 tons of grain.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the amount of grain throughput for this emissions unit (in tons per month and total tons, to date for the calendar year).

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedance of the annual grain throughput limitation, as well as the corrective actions that were taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in the Applicable Emissions Limitation section of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:
3.08 tons fugitive PE per year

Applicable Compliance Method:

The emission limitation was established by multiplying an AP-42 emission factor of 0.22 lb PE/ton grain (Section 9.9.1 (3/2003)) by the maximum annual grain throughput of 28,000 tons and multiplying by a conversion factor of ton/2000 lbs. Therefore provided compliance is shown with the maximum annual grain throughput, compliance with the annual limitation will be assumed.

- b. Emission Limitation:
Visible fugitive PE shall not exceed 20% opacity as a 3-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR,

EMP Cooperative
PTI Application: 03 16100
Issued

Facility ID: 0363000133

Emissions Unit ID: **F004**

Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F005 - Paved roadway (surface area of 101,250 ft ²)	OAC rule 3745-31-05(A)(3)	1.02 tons fugitive particulate matter (PE) per year There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any 60-minute observation period Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.c through A.2.g)
	OAC rule 3745-17-08(B)	See A.2.a
	OAC rule 3745-17-07(B)	See A.2.b

2. Additional Terms and Conditions

- 2.a EMP Cooperative is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), OAC rule 3745-17-08 does not apply to this fugitive dust source.
- 2.b Because OAC rule 3745-17-08 is not applicable, this emissions unit is exempt from the visible particulate emissions (PE) limitation specified in OAC rule 3745-17-07(B) pursuant

to OAC rule 3745-17-07(B)(11)d.

- 2.c The plant roadway and parking area that is covered by this permit and subject to the above-mentioned requirements are listed below:

Paved roadway and parking area:

Main Road Vehicle Entrance and Staging Area

- 2.d The permittee shall employ best available control measures on the paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by watering, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an paved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.f Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.g Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).

Operational Restrictions

None

Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
Main Road Vehicle Entrance and Staging Area	once per day of operation

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from Ohio EPA's Northwest District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in '4.d.' shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

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- b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

Testing Requirements

1. Compliance Methods Requirements:

Compliance with the emission limitation(s) established in the Applicable Emissions Limitation section of this permit shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
1.02 tons fugitive PE/yr

Applicable Compliance Method:

The emission limitation represents the potential to emit for this emissions unit. The maximum potential uncontrolled emission rate for paved roadways was calculated by multiplying an emission factor of 1.02 lb PE per vehicle mile traveled (VMT) (AP-42, section 13.2.1, 12/2003) with a maximum VMT of 2,000 miles and converting by multiplying with 1 ton per 200 pounds. Therefore, provided compliance is shown with the requirements associated with best available control measures, compliance with the ton per year PE limitation will be assumed.

- b. Visible Emissions Restrictions:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the emissions limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60, Standards of Performance for New Stationary Sources, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

Miscellaneous Requirements

None

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WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

3-sided enclosure on both dump pits, totally enclosed system on the transferring and conveying operations and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? _____

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TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____

YES

NO

IDENTIFY THE AIR CONTAMINANTS: _____

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Emissions Unit ID: **F005**

AIR TOXICS MODELING PERFORMED*?

_____ YES

_____ NO

IDENTIFY THE AIR CONTAMINANTS:

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SIC CODE	5153	3-02-00	EMISSIONS UNIT ID	F003
		5-63		

EMISSIONS UNIT DESCRIPTION Grain loading into rail car
 DATE INSTALLED 1982

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					0.58
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

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TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

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SIC CODE	5153	3-02-00	EMISSIONS UNIT ID	F004
		S C C C O D E		

EMISSIONS UNIT DESCRIPTION Grain Dryer (1,500 bushels per hour capacity)
 DATE INSTALLED 1977

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions		PTI Allowable	
		Rate		Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					3.08
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY?
 No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Column plate perforation of 0.094 inches of diameter or less and compliance with the terms and conditions of this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH)

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has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____

YES

_____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

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SIC CODE	5153	A22940	EMISSIONS UNIT ID	F005
		00000		

EMISSIONS UNIT DESCRIPTION Paved roadway
 DATE INSTALLED 1965/1982

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					1.02
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

OFFSET POLICY? No

PSD? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Watering when necessary and compliance with the terms and conditions of this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

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TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

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AIR TOXICS MODELING PERFORMED*? _____

YES

_____ NO

IDENTIFY THE AIR CONTAMINANTS:
