



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
PUTNAM COUNTY**

CERTIFIED MAIL

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: 03-13793

DATE: 10/30/2003

Iams Company
Robert Hall
3700 State Route 65
Leipsic, OH 45856

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, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/30/2003
Effective Date: 10/30/2003**

FINAL PERMIT TO INSTALL 03-13793

Application Number: 03-13793
APS Premise Number: 0369000037
Permit Fee: **\$1250**
Name of Facility: Iams Company
Person to Contact: Robert Hall
Address: 3700 State Route 65
Leipsic, OH 45856

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3700 St Rt 65
Leipsic, Ohio**

Description of proposed emissions unit(s):
Grain unloading (truck and railcar), handling and storage area; Unit E1.

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 recordkeeping 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 recordkeeping 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

Iams Company
PTI Application: 03-13793
Issued: 10/30/2003

Facility ID: 0369000037

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

Iams Company
PTI Application: 03-13793
Issued: 10/30/2003

Facility ID: 0369000037

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.

Iams Company
 PTI Application: 03-13793
 Issued: 10/30/2003

Facility ID: 0369000037

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 (stack)	0.86
PE (fugitive)	0.26

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P901 - Grain unloading (truck and railcar), handling and storage area; Unit E1 (modification of PTI #03-13793, issued on 05/16/2002) Modification involves an increase in the throughput capacity to the truck and railcar receiving hopper resulting in emission limit changes	OAC rule 3745-31-05(A)(3)	<u>stack emissions:</u> 0.81 lb particulate emissions (PE)/hr 0.86 tons PE/yr (see A.2.a) see A.2.b
		<u>fugitive emissions:</u> 0.26 tons PE/yr 5% opacity, as a six-minute average from grain receiving operations
		0% opacity, as a six-minute average from the baghouse
		0% opacity, as a six-minute average from grain handling/storage operations
	OAC rule 3745-17-11 (B)(2)	see A.2.c
OAC rule 3745-17-07 (A)(3)	see A.2.c	
OAC rule 3745-17-08 (B)	none (see A.2.d)	
OAC rule 3745-17-07 (B)	none (see A.2.e)	

2. Additional Terms and Conditions

- 2.a** All particulate emissions are assumed to be particulate matter less than 10 μm in size (PM₁₀)

- 2.b** The "Best Available Technology" (BAT) control requirements for emissions unit P901 have been determined to be the following:
- i. Use of a drive-through tunnel (building) with closed overhead door for truck/railcar loading and unloading.
 - ii. Use of appropriate sized grain receiving system to facilitate choke-feed condition for truck/railcar unloading.
 - iii. Use of an aspiration system vented to a baghouse serving the transferring and conveying of grain. The baghouse shall achieve a maximum outlet concentration of 0.01 gr/dscf.
 - iv. Use of telescoping chute for truck/railcar loading.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).
- 2.d** The Iams Company Facility is not located within an "appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements.
- 2.e** 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).

B. Operational Restrictions

1. The permittee shall keep the overhead door of the drive-through tunnel (building) closed at all times while loading/unloading grain.
2. The permittee shall perform all unloading operations in a manner to maintain a choke-feed condition.
3. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5 inches of water while the emissions unit is in operation.
4. The permittee shall not operate the aspiration system for the whole grain storage silos during grain unloading operations.
5. The maximum annual grain throughput for emissions unit P901 shall not exceed 295,000 tons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the amount of (tons per month and total tons, to date for the calendar year) grain throughput for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These deviations reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual grain throughput limitation, as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.81 lb PE/hr and 0.86 tons PE/yr from baghouse

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum grain loading of 0.01 gr/dscf by the maximum volumetric air flow (9500 dscfm), using the appropriate conversion factors of 7000 grains/lb, 1 scf/1 acf, 60 minutes/hr. Compliance shall be demonstrated by the monitoring, record keeping, and reporting requirements for the baghouse. If required, compliance shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A -

Iams Company**PTI Application: 02 12702****Issued****Facility ID: 0369000037****Emissions Unit ID: P901****Method 5.**

The permittee shall demonstrate compliance with the annual emission limitation by multiplying the hourly emission limitation by the maximum operating schedule of 2122 hrs/yr (based on an annual throughput of 295,000 tons) and 2000 lbs/ton. Therefore, provided compliance is shown with the annual throughput limitation; compliance will also be shown with the annual limitation.

- b. Emission Limitation:
0.26 tons PE/yr (fugitive)

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the appropriate emission factors from AP-42 Chapter 9.9.1 (5/98) (0.035 lb PE/ton handled) by the maximum throughput (295,000 tons/yr), dividing by 2000 lbs/ton and applying a 95% control efficiency for controls applied.

- c. Emission Limitation:
- i. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average from grain receiving operations.
 - ii. Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from the baghouse.
 - iii. Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from grain handling operations.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. This permit supercedes PTI #03-13793, issued on 05/16/2002, for emissions unit P901 only.
2. The modification of this emissions unit will result in a baghouse stack height of 44 feet, 11 inches above ground level which was used in air dispersion modeling to demonstrate compliance with Ohio EPA's acceptable incremental impact.