



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: 03-13816**

**DATE:** 8/27/2002

Pandora Grain and Supply Inc.  
Gary Luginbill  
305 S. Jefferson Street  
Pandora, OH 45877

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  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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: 8/27/2002  
Effective Date: 8/27/2002**

**FINAL PERMIT TO INSTALL 03-13816**

Application Number: 03-13816  
APS Premise Number: 0369000150  
Permit Fee: **\$7000**  
Name of Facility: Pandora Grain and Supply Inc.  
Person to Contact: Gary Luginbill  
Address: 305 S. Jefferson Street  
Pandora, OH 45877

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**305 S. Jefferson Street  
Pandora, Ohio**

Description of proposed emissions unit(s):  
**Grain loadout system, grain receiving units, dryer, storage pile.**

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

**Pandora Grain and Supply Inc.**  
**PTI Application: 03-13816**  
**Issued: 8/27/2002**

**Facility ID: 0369000150**

## **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 Related to Monitoring and Record keeping 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

**Pandora Grain and Supply Inc.**  
**PTI Application: 03-13816**  
**Issued: 8/27/2002**

**Facility ID: 0369000150**

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

**Pandora Grain and Supply Inc.**

**PTI Application: 03-13816**

**Issued: 8/27/2002**

**Facility ID: 0369000150**

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**Pandora Grain and Supply Inc.**  
**PTI Application: 03-13816**  
**Issued: 8/27/2002**

**Facility ID: 0369000150**

**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	7.10

**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 units	OAC rule 3745-31-05(A)(3)	Control requirements (see A.2.a)  <u>Grain receiving:</u> 3.11 tons fugitive particulate emissions (PE) per year  Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 6-minute average  <u>Transferring and Conveying:</u> 0.05 ton PE per year  Visible fugitive PE shall not exceed 0% opacity, as a 6-minute average
	OAC rule 3745-17-07(B)	see A.2.b
	OAC rule 3745-17-08(A)	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 the back receiving station; 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** Pandora Grain & Supply 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 34,580 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 at the back receiving station 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 from back receiving station:
    - 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 visible fugitive particulate emissions were observed from the grain receiving at the back receiving station, transferring, and conveying operations and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) 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  
Grain Receiving: 3.11 tons fugitive PE/year

**Pandora Grain and Supply Inc.**

**PTI Application: 02 12016**

**Issued**

**Facility ID: 0369000150**

**Emissions Unit ID: F001**

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying an AP-42 emission factor of 0.18 lb PE/ton grain (Section 9.9.1 (5/98)), a maximum annual grain throughput of 34,580 tons of grain, and multiplying by a conversion factor of ton/2000 lbs.

b. Emission Limitation

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 6-minute average from grain receiving

Applicable Compliance Method

If required, compliance with the visible fugitive PE limitation shall be determined in accordance with the test methods and procedures in USEPA Method 9, which is located in 40 CFR Part 60, Appendix A.

c. Emission Limitation

Transferring/Conveying: 0.05 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 (5/98)), a maximum annual grain throughput of 34,580 tons of grain, applying a control efficiency of 95% for total enclosure, and multiplying by a conversion factor of ton/2000 lbs.

d. Emission Limitation

Visible fugitive PE shall not exceed 0% opacity, as a 6-minute average from transferring and conveying operations

Applicable Compliance Method

If required, compliance with the visible fugitive PE limitation shall be determined in accordance with the test methods and procedures in USEPA Method 9, which is located in 40 CFR Part 60, Appendix A.

**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 - Truck Grain loadout system	OAC rule 3745-31-05(A)(3)	Control requirements (see A.2.a)  0.15 ton fugitive PE/year  Visible fugitive PE shall not exceed 10% opacity, as a 6-minute average from truck loading
	OAC rule 3745-17-07 (B)	See A.2.b
	OAC rule 3745-17-08(A)	See A.2.c

**2. Additional Terms and Conditions**

- 2.a The "Best Available Technology" (BAT) control requirements for emissions unit F002 has been determined to be the use of an adjustable chute for all truck loading operations. 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 Pandora Grain & Supply 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 34,580 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 loadout 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:
  - a. The color and location of the emissions;
  - b. Whether the emissions are representative of normal operations;
  - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. The total duration of any visible emission incident; and,
  - e. Any corrective actions taken to eliminate the visible emissions.

**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 visible particulate emissions were observed from the truck loadout system and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) 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  
0.15 ton fugitive PE/year

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying an AP-42 emission factor of 0.086 lb PE/ton grain (Section 9.9.1 (5/98)) by a maximum annual grain throughput of 34,580 tons of grain and the control efficiency provided by the adjustable chute of 90% and multiplying by a conversion factor of ton/2000 lbs.

- b. Emission Limitation  
Visible fugitive PE shall not exceed 10% opacity, as a 6-minute average, during truck loading

Applicable Compliance Method

If required, compliance with the visible fugitive PE limitation shall be determined in accordance with the test methods and procedures in USEPA Method 9, which is located in 40 CFR Part 60, Appendix A.

## **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 dryer (1,000 bushels per hour)	OAC rule 3745-31-05(A)(3)	Control requirements (see A.2.a)  3.52 tons fugitive PE/year  Visible fugitive PE shall not exceed 20% opacity as a 6-minute average
	OAC rule 3745-17-07(B)	See A.2.b
	OAC rule 3745-17-08(A)	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 Pandora Grain & Supply 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 F003 shall not exceed 32,032 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 with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 3.52 TPY fugitive PE

Applicable Compliance Method: The permittee shall demonstrate compliance by multiplying an AP-42 emission factor of 0.22 lb PE/ton grain (Section 9.9.1 (5/98)) by the maximum annual grain throughput of 32,032 tons and multiplying by a conversion factor of ton/2000 lbs.

- b. Emission Limitation: Visible fugitive PE shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method: If required, compliance with the visible fugitive PE limitation shall be determined in accordance with the test methods and procedures specified in USEPA Method 9 of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

None

16

**Pando**

**PTI A**

**Issued: 8/27/2002**

Emissions Unit ID: **F003**

**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 - Storage pile (see Section 2.a for identification of storage pile)	OAC rule 3745-31-05(A)(3)	0.27 ton fugitive PE/year
		no visible fugitive particulate emissions except for one minute in any one hour
		best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.d)
	OAC rule 3745-17-07(B)	see A.2.e
	OAC rule 3745-17-08(A)	see A.2.f

**2. Additional Terms and Conditions**

- 2.a The storage pile that is covered by this permit and subject to the requirements of OAC rule 3745-31-05 is listed below:

Storage pile of corn in the back of the facility

- 2.b The permittee shall employ best available control measures on the storage pile located in the back of the facility 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 covering the storage pile with tarpaulin at all times and has

Emissions Unit ID: **F004**

also committed to applying mineral oil as needed. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** The above-mentioned control measure of mineral oil application shall be employed for the storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure shall continue during any such operation until further observation confirms that use of the measure is unnecessary.
- 2.d** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 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).
- 2.f** Pandora Grain & Supply 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 emission 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 14,784 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).
- 2.** Except as otherwise provided in this section, the permittee shall perform inspections of the storage pile at the back of the facility in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum inspection frequency</u>
All	Once per day for load-in and load-out operations

- 3.** The purpose of the inspections is to determine the need for implementing the control measure of mineral oil application for controlling load-in and load-out of storage pile emissions. The inspections shall be performed during representative, normal storage pile operating conditions.

4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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.
5. The permittee shall maintain records of the following information:
  - a. The date and reason any required inspection was not performed;
  - 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.

The information required in 7.d. shall be kept and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

#### **D. 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; and,
  - b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 0.27 ton fugitive PE/year  
Applicable Compliance Method: The permittee shall demonstrate compliance by

**Pandora Grain and Supply Inc.**

**PTI Application: 02-12016**

**Issued**

**Facility ID: 0369000150**

Emissions Unit ID: **F004**

multiplying an AP-42 emission factor of 0.18 lb PE/ton grain (Section 9.9.1 (5/98)) by the maximum annual grain throughput of 14,784 tons, applying a control efficiency of 80% for the use of trapaulin and mineral oil, and multiplying by a conversion factor of ton/2000 lbs.

- b. Emission Limitation: no visible fugitive particulate emissions except for one minute in any one hour

Applicable Compliance Method: If required, compliance with the visible fugitive PE limitation shall be determined in accordance with the test methods and procedures specified in USEPA Method 22 of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13816 Facility ID: 0369000150

FACILITY NAME Pandora Grain and Supply Inc.

FACILITY DESCRIPTION Grain loadout svstem. grain receiving units. CITY/TWP Pandora

Emissions Unit ID: **F004**

SIC CODE 5153 SCC CODE 3-02-005-50 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Grain receiving stations of which the newer station will have a three-sided enclosure and each station has a maximum capacity of 4,000 bushels per hour

DATE INSTALLED 1996

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					3.16
PM <sub>10</sub>					
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?**

**Use of a three-sided enclosure on the new station (back) along with the terms and conditions as stated in the 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) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_





**24 NEW SOURCE REVIEW FORM B**

PTI Number: 03-13816

Facility ID: 0369000150

FACILITY NAME Pandora Grain and Supply Inc.

FACILITY DESCRIPTION Grain loadout system. grain receiving units. CITY/TWP Pandora

Emissions Unit ID: **F004**

SIC CODE 5153

SCC CODE 3-02-005-51

EMISSIONS UNIT ID F004

EMISSIONS UNIT DESCRIPTION Storage pile that has a maximum capacity of 3,000 bushels per hour

DATE INSTALLED 1987

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					0.27
PM <sub>10</sub>					
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?

Use of mineral oil to reduce fugitive emissions and a tarp that will minimize the wind erosion

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) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES  X  NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_