State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
WYANDOT COUNTY
Application No: 03-17248
Fac ID: 0388010055
DATE: 1/31/2008

PSD Partners LLC
Andrew Bishop
7148 State Route 199 North
Upper Sandusky, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 0** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Permit Issuance and Data Management Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO** **MI**

WYANDOT COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-17248** FOR AN AIR CONTAMINANT SOURCE
FOR **PSD Partners LLC**

On 1/31/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **PSD Partners LLC**, located at **5968 State Route 199 North, Upper Sandusky**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17248:

Feed mill with grain grinder, pellet mill system, truck receiving and truck loadout operations.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

DRAFT MODIFICATION OF PERMIT TO INSTALL 03-17248

Application Number:	03-17248
Facility ID:	0388010055
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	PSD Partners LLC
Person to Contact:	Andrew Bishop
Address:	7148 State Route 199 North Upper Sandusky, OH 43351

Location of proposed air contaminant source(s) [emissions unit(s)]:
5968 State Route 199 North
Upper Sandusky, **Ohio**

Description of proposed emissions unit(s):
Feed mill with grain grinder, pellet mill system, truck receiving and truck loadout operations.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
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 (i.e., postmarked) quarterly 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.

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

Pollutant	Tons Per Year
PM10	30.53
Fugitive PE	8.15
Fugitive PM10	2.76
OC	30.66

Emissions Unit ID: **F001**

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.

Operations, Property, and/or Equipment - (F001) - Truck loading

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	8.15 tons of fugitive particulate emissions (PE) per rolling, 12-month period 2.76 tons of fugitive particulate matter 10 microns or less in size (PM_{10}) per rolling, 12-month period Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average. See A.2.a
OAC rule 3745-31-05(A)(3)(b)	See A.2.d
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 This permit establishes allowable emission limitations of 8.15 tons of fugitive PE per rolling, 12-month period and 2.76 tons of fugitive PM10 per rolling, 12-month period, and an associated visible emission standard. The long-term (tons/yr) emission limitations for PE and PM10 are being established as federally enforceable requirements to represent the potential to emit based on the use of a building enclosure.

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 This facility is not located within the areas identified in "Appendix A" of OAC

rule 3745-17-08 (it is located in Wyandot County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2.d The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM10 and PE from this air contaminant source since the calculated annual emission rate for PM10 and PE are each less than ten tons per year taking into account the federally enforceable emission limitations established under OAC rule 3745-31-05(C).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

   d. the total duration of any visible emission incident; and

   e. any corrective actions taken to 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 (d) 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 semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit 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 with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Emission Limitation: 8.15 tons of fugitive PE per rolling, 12-month period

      Applicable Compliance Method: The tons of fugitive PE/yr limitation was developed by multiplying the maximum hourly throughput rate (confidential), an emission factor from the FIRES database (version 6.25, SCC 3-02-005-60), the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

   b. Emission Limitation: 2.76 tons of fugitive PM_{10} per rolling, 12-month period

      Applicable Compliance Method: The tons of fugitive PM_{10}/yr limitation was developed by multiplying the maximum hourly throughput rate (confidential), an emission factor from the FIRES database (version 6.25, SCC 3-02-005-60), the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

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

      Applicable Compliance Method: 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, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P001) - Grinder with baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	0.02 grains (gr) particulate matter 10 microns or less in size (PM10) per dry standard cubic foot (dscf) and 3.02 tons PM10 per rolling, 12-month period (see A.2.a) Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average. See A.2.b
OAC rule 3745-31-05(A)(3)	See A.2.d
OAC rule 3745-17-07(A)	See A.2.c
OAC rule 3745-17-11(B)	See A.2.c

2. Additional Terms and Conditions

2.a All emissions of particulate matter are PM10.

2.b This permit establishes allowable emission limitations of 0.02 gr PM10/dscf and 3.02 tons of PM10 per rolling, 12-month period. The short-term (gr/dscf) , long-term (tons/yr) emission limitations for PM10 and associated visible emission standard are being established as federally enforceable requirements to represent the potential to emit based on the use of a baghouse meeting a maximum outlet concentration of 0.02 gr PM10/dscf.

2.c The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).

2.d The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM10 from this air

contaminant source

since the calculated annual emission rate for PM10 is less than ten tons per year taking into account the federally enforceable emission limitations established under OAC rule 3745-31-05(C).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. 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, in inches of water, across the baghouse on daily basis.

   Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

   In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

   The acceptable range for the pressure drop across the baghouse is 1 to 6 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

   a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

   b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

   c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

   d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

   These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Emission Limitations: 0.02 gr PM10/dscf and 3.02 tons of PM10 per rolling, 12-month period

   Applicable Compliance Methods: The 0.02 gr PM10/dscf limitation is the

established maximum outlet concentration. The tons PM10/yr limitation was established by multiplying the maximum outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow (4000 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr, 8760 hours/year and dividing by 2000 lbs/ton. If required, the permittee shall demonstrate compliance with the gr/dscf limitation by testing in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, Methods 1-4 (volumetric air flow rate). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

b. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P002) - Pellet mill system no. 1 with cyclones

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	2.86 lbs particulate matter 10 microns or less in size (PM10) /hr and 12.53 tons of PM10 per rolling, 12-month period (See A.2.a) See A.2.b
OAC rule 3745-31-05(A)(3)	7.00 lbs organic compounds (OC)/hr and 30.66 tons of OC/yr (See A.2.d) See A.2.e
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.2.c
OAC rule 3745-21-07(G)	None (See B.1)

2. Additional Terms and Conditions

2.a All emissions of particulate matter are PM10.

2.b This permit establishes allowable emission limitations of 2.86 lbs PM10/hr, 12.53 tons of PM10 per rolling, 12-month period. The short-term (lbs/hr) and long-term (tons/yr) emission limitations for PM10 and associated visible emission standard are being established as federally enforceable requirements to represent the potential to emit based on the use of cyclones achieving a 99% removal efficiency for particulate matter.

2.c The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule) OAC rule 3745-31-05(C).

Emissions Unit ID: **P002**

2.d The organic compounds emission limitations represent the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with these limitations. The limitations for OC represent the federally enforceable potential to emit for volatile organic compounds (VOC).

2.e The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(C).

B. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following information each month for this emissions unit:

   a. the company identification of each liquid organic material employed; and

   b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

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

   a. the color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

   d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the cyclones serving this emissions unit 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 with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Emission Limitations: 2.86 lbs PM10/hr and 12.53 tons of PM10 per rolling, 12-month period

      Applicable Compliance Methods: Compliance with the hourly emission limitation shall be determined by multiplying the maximum process weight rate (confidential), an emission factor established during a 2001 stack test of a similar unit and a control efficiency of 99%. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, Methods 1-4 (volumetric air flow rate). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

      Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours of operation and dividing by 2000 lbs/ton.

   b. Emission Limitations: 7.00 lbs OC/hr and 30.66 tons of OC/yr

Applicable Compliance Methods: Compliance with the hourly emission limitation shall be determined by multiplying the maximum process weight rate (confidential) and an emission factor established during a 2001 stack test of a similar unit. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours of operation and dividing by 2000 lbs/ton.

c. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P003) - Ingredient receiving - truck with baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	0.02 grains (gr) particulate matter 10 microns or less in size (PM10) per dry standard cubic foot (dscf) and 7.49 tons of PM10 per rolling, 12-month period (see A.2.a) Visible PE particulate emissions shall not exceed 0% opacity, as a 6-minute average. See A.2.b
OAC rule 3745-31-05(A)(3)(b)	See A.2.d
OAC rule 3745-17-07(A)	See A.2.c
OAC rule 3745-17-11(B)	See A.2.c

2. Additional Terms and Conditions

2.a All emissions of particulate matter are PM10.

2.b This permit establishes allowable emission limitations of 0.02 gr PM10/dscf and 7.49 tons of PM10 per rolling, 12-month period. The short-term (gr/dscf) and long-term (tons/yr) emission limitations for PM10 and associated visible emission standard are being established as federally enforceable requirements to represent the potential to emit based on the use of a baghouse meeting a maximum outlet concentration of 0.02 gr PM10/dscf.

2.c The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C) .

2.d The Best Available Technology (BAT) requirements under OAC rule

3745-31-05(A)(3) do not apply to the emissions of PM10 from this air contaminant source since the calculated annual emission rate for PM10 is less than ten tons per year taking into account the federally enforceable emission limitations established under OAC rule 3745-31-05(C).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. 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, in inches of water, across the baghouse on daily basis.

   Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

   In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

   The acceptable range for the pressure drop across the baghouse is 1 to 6 inches of

water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

   a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

   b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

   c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

   d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

   These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Emission Limitations: 0.02 gr PM10/dscf, and 7.49 tons of PM10 per rolling, 12-month period

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Applicable Compliance Methods: The 0.02 gr PM10/dscf limitation is the established maximum outlet concentration. The tons PM10/yr limitation was established by multiplying the maximum outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow (10,000 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr, 8760 hours/year and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr/dscf limitation by testing in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, Methods 1-4 (volumetric air flow rate). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

b. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

None

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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.

Operations, Property, and/or Equipment - (P004) - Grain receiving - truck with baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	0.02 grains (gr) particulate matter 10 microns or less in size (PM10) per dry standard cubic foot (dscf) and 7.49 tons of PM10 per rolling, 12-month period (see A.2.a) Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average. See A.2.b
OAC rule 3745-31-05(A)(3)(b)	See A.2.d
OAC rule 3745-17-07(A)	See A.2.c
OAC rule 3745-17-11(B)	See A.2.c

2. Additional Terms and Conditions

2.a All emissions of particulate matter are PM10.

2.b This permit establishes allowable emission limitations of 0.02 gr PM10/dscf and 7.49 tons of PM per rolling, 12-month period. The short-term (gr/dscf) , long-term (tons/yr) emission limitations for PM10 and associated visible emission standard are being established as federally enforceable requirements to represent the potential to emit based on the use of a baghouse meeting a maximum outlet concentration of 0.02 gr PM10/dscf.

2.c The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C) .

2.d The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM10 from this air contaminant source since the calculated annual emission rate for PM10 is less than ten tons per year taking into account the federally enforceable emission limitations established under OAC rule 3745-31-05(C).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. 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, in inches of water, across the baghouse on daily basis.

   Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

   In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

   The acceptable range for the pressure drop across the baghouse is 1 to 6 inches of

water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

   a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

   b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

   c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

   d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

   These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Emission Limitations: 0.02 gr PM10/dscf and 7.49 tons of PM10 per rolling, 12-month period

Applicable Compliance Methods: The 0.02 gr PE/dscf limitation is the established maximum outlet concentration. The tons PM10/yr limitation was established by multiplying the maximum outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow (10,000 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr, 8760 hours/year and dividing by 2000 lbs/ton. If required, the permittee shall demonstrate compliance with the gr/dscf limitation by testing in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, Methods 1-4 (volumetric air flow rate). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

b. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.

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Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

None