



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 04-01488

Fac ID: 0448010023

DATE: 1/31/2008

Kraft Foods Global, Inc.
Todd Habets
2221 Front St.
Toledo, OH 43605

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

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

CC: USEPA

TDES



**Permit To Install
Terms and Conditions**

**Issue Date: 1/31/2008
Effective Date: 1/31/2008**

FINAL PERMIT TO INSTALL 04-01488

Application Number: 04-01488
Facility ID: 0448010023
Permit Fee: **\$2500**
Name of Facility: Kraft Foods Global, Inc.
Person to Contact: Todd Habets
Address: 2221 Front St.
Toledo, OH 43605

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2221 Front St.
Toledo, Ohio**

Description of proposed emissions unit(s):
White wheat system.

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

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

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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)

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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.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.33
PM10	0.16

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 - (F011) - screening and cleaning, transferring and conveying; line 6 white wheat process

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from this emissions unit shall not exceed 0.065 pound per hour PE from this emissions unit shall not exceed 0.29 ton per rolling, 12-month period particulate matter of 10 microns or less in diameter (PM10) from this emissions unit shall not exceed 0.034 pound per hour PM10 from this emissions unit shall not exceed 0.15 ton per rolling, 12-month period see Sections A.2.a thru e
OAC rule 3745-17-07(B)(1)	the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
OAC rule 3745-17-08(B)	see Section A.2.e
NSPS DD	particulate emissions from any stack serving this emissions unit shall not exceed 0.023 g/dscm (0.01 gr/dscf) or 0% opacity as a 6-minute average visible fugitive particulate emissions from any egress serving this emissions unit shall not exceed 0% opacity as a 6-minute average

2. Additional Terms and Conditions

- 2.a** The hourly emission limitations were established to reflect the enforceable

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potential to emit for this emissions unit based on a maximum of 36 tons wheat processed per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

- 2.b** The annual emission limitations were established to reflect the federally enforceable potential to emit for this emissions unit based on 731,000 tons wheat processed per year (the maximum capacity of the white wheat screening and cleaning equipment). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The requirements of this rule also include compliance with the requirements of OAC 3745-17-08(B) and NSPS DD.
- 2.d** The permittee shall employ best available control measures for the above-identified material handling operation(s) 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 perform the following control measure(s) to ensure compliance:
- | material handling operation(s) | control measure(s) |
|------------------------------------|---|
| white wheat screening and cleaning | full enclosure with a fabric filtration system exhausting to the enclosed space |
| white wheat transfer and conveying | full enclosure with a fabric filtration system exhausting to the enclosed space |
- Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

1. The permittee shall operate all fabric filters associated with the active portions of this emissions unit whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process was in operation.
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 any stack serving this emissions unit and 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 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.

3. For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

D. Reporting Requirements

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1. The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any daily record showing that a fabric filter was not in service when the associated process was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) 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.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation;

0% opacity, as a six-minute average

Applicable Compliance Method;

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303.
 - b. Emission Limitation:

PE from any stack serving this emissions unit shall not exceed 0.023 g/dscm (0.01 gr/dscf)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions

Emissions Unit ID: **F011**

limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in 40 CFR 60.303.

c. Emission Limitation:

PE from this emissions unit shall not exceed 0.065 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows:

for screening and cleaning - multiply the emission factor of 0.12 pound of PE emissions per ton of grain (assuming 90% efficient control with a cyclone) by the maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and by one minus the control efficiency (1-0.99);

and to this add:

for transferring and conveying - multiply the emission factor of 0.061 pound of PE emissions per ton of grain (assuming 90% efficient control with a cyclone) by the maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.29 ton per year of PE

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit operating at 8,760 hours per year. Therefore, provided compliance is shown

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with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

PM10 from this emissions unit shall not exceed 0.034 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows:

for screening and cleaning - multiply the emission factor of 0.06 pound of PM10 emissions per ton of grain (assuming 90% efficient control with a cyclone) by the

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maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99); and to this add:

for transferring and conveying - multiply the emission factor of 0.034 pound of PE emissions per ton of grain (assuming 90% efficient control with a cyclone) by the maximum hourly rate of grain processing in this emissions unit (36 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);

If required, the permittee shall demonstrate compliance with the emission factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

0.15 ton per year of PM10

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit operating at 8,760 hours per year. Therefore, provided compliance is shown with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days of final issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the visible fugitive particulate emissions limitation from the stack and any egress serving this emissions unit, and the stack mass PE concentration and hourly emission limitation.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):

Emissions Unit ID: **F011**

Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A using the methods and procedures of 40 CFR 60.303.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Note: This emissions testing protocol is based on the assumption of 100% capture of all potential fugitive emissions and the return of the uncontrolled emissions to the capture enclosure. Based on the reported results of this test, additional stack testing may be required, including but not limited to Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A and Methods 201, 202 and 204 of 40 CFR Part 51, Appendix M.

F. Miscellaneous Requirements

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1. All of the terms and conditions of this permit are also Federally enforceable terms and conditions.

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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 - (F012) - railcar loading; line 6 white wheat process

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>particulate emissions (PE) from this emissions unit shall not exceed 0.009 pound per hour</p> <p>PE from this emissions unit shall not exceed 0.04 ton per rolling, 12-month period</p> <p>particulate matter of 10 microns or less in diameter (PM10) from this emissions unit shall not exceed 0.001 pound per hour</p> <p>PM10 from this emissions unit shall not exceed 0.01 ton per rolling, 12-month period</p> <p>see Sections A.2.a thru e</p>
OAC rule 3745-17-07(B)(1)	the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
OAC rule 3745-17-08(B)	see Section A.2.e
NSPS DD	<p>particulate emissions from any stack serving this emissions unit shall not exceed 0.023 g/dscm (0.01 gr/dscf) or 0% opacity as a 6-minute average</p> <p>visible fugitive particulate emissions from the railcar loading station shall not exceed 5% opacity as a 6-minute average</p> <p>visible fugitive particulate emissions from any other egress serving this emissions unit (i.e., any egress serving the baghouse discharge) shall not exceed 0% opacity as a 6-minute average</p>

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Emissions Unit ID: **F012**

Emissions Unit ID: F012

2. Additional Terms and Conditions

- 2.a** The hourly emission limitation was established to reflect the enforceable potential to emit for this emissions unit based on a maximum of 32.4 tons of cleaned wheat produced per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The annual emission limitations were established to reflect the federally enforceable potential to emit for this emissions unit based on 283,000 tons of cleaned wheat produced per year (the maximum production capacity of the white wheat screening and cleaning equipment of F011). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The requirements of this rule also include compliance with the requirements of OAC 3745-17-08(B) and NSPS DD.
- 2.d** The permittee shall employ best available control measures for the above-identified material handling operation(s) 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 perform the following control measure(s) to ensure compliance:

material handling operation(s)	control measure(s)
rail car loadout	a sealed, screw conveyor shall be fitted over the top of the slot in the railcars, completely enclosing the railcar opening while negative pressure is maintained by an integral fabric filter based dust collection system, where the return of the uncontrolled emissions is to the building enclosing emissions unit F011

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.e** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

Emissions Unit ID: **F012**

1. The permittee shall operate all fabric filters associated with this emissions unit whenever this emissions unit is in operation.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the fabric filter was not in service when this process was in operation.
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 any stack serving this emissions unit and 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 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.

3. For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any daily record showing that a fabric filter was not in service when the associated process was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) 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.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation;

0% opacity, as a six-minute average

Applicable Compliance Method;

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in 40 CFR 60.303.
 - b. Emission Limitation;

5% opacity, as a six-minute average

Applicable Compliance Method;

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods

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and procedures specified in 40 CFR 60.303.

c. Emission Limitation;

PE from any stack serving this emissions unit shall not exceed 0.023 g/dscm
(0.01 gr/dscf)

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Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in 40 CFR 60.303.

d. Emission Limitation:

PE from this emissions unit shall not exceed 0.009 pound per hour

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows: multiply the uncontrolled emission factor of 0.027 pound of PE emissions per ton of grain by the maximum hourly rate of grain processing in this emissions unit (32.4 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation:

0.04 ton per year of PE

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit operating at 8,760 hours per year. Therefore, provided compliance is shown with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

PM10 from this emissions unit shall not exceed 0.001 pound per hour

Emissions Unit ID: F012

Applicable Compliance Method:

This emissions limitation was established through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-2 dated 3/03, as follows: multiply the uncontrolled emission factor of 0.0022 pound of PE emissions per ton of grain by the maximum hourly rate of grain processing in this emissions unit (32.4 tons wheat) by the capture efficiency (1.00), and one minus the control efficiency (1-0.99);

If required, the permittee shall demonstrate compliance with the emission factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

0.01 ton per year of PM10

Applicable Compliance Method:

This limitation represents the full potential to emit for this emissions unit operating at 8,760 hours per year. Therefore, provided compliance is shown with the short term emissions limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the visible fugitive particulate emissions limitation from the stack and any egress serving this emissions unit (including the wheat load-out station and the building enclosing the fabric filter discharge), and the stack mass PE concentration and hourly emission limitation.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):

Issued: 1/31/2008

Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A using the methods and procedures of 40 CFR 60.303.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Note: This emissions testing protocol is based on the assumption of 100% capture of all potential fugitive emissions and the return of the uncontrolled emissions to the capture enclosure. Based on the reported results of this test, additional stack testing may be required, including but not limited to Methods 1 thru 5 and 9 of 40 CFR Part 60 Appendix A and Methods 201, 202 and 204 of 40 CFR Part 51, Appendix M.

F. Miscellaneous Requirements

1. All of the terms and conditions of this permit are also Federally enforceable terms and conditions.