



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL  
LUCAS COUNTY  
Application No: 04-00263

DATE: 2/1/2001

Toledo Alfalfa Mills Inc  
Vincent Lumbrezer  
661 S Stadium Rd  
Oregon, OH 43616

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

TDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 2/1/2001  
Effective Date: 2/1/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 04-00263

Application Number: **04-00263**  
APS Premise Number: **0448020004**  
Permit Fee: **\$0**  
Name of Facility: **Toledo Alfalfa Mills Inc**  
Person to Contact: **Vincent Lumbrezer**  
Address: **661 S Stadium Rd**  
**Oregon, OH 43616**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**861 S Stadium Rd**  
**Oregon, OHIO**

Description of modification:

**Modification to PTI 04-00263, issued 7/16/97, to change permit allowable emissions, PM, wet feed rate to dry feed rate and to limit the operating hours to 3500 hrs/yr.**

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

Director

**Toledo Alfalfa Mills Inc**  
**PTI Application: 04-00263**  
**Modification Issued: 2/1/2001**

Facility ID: **0448020004**

## **GENERAL PERMIT CONDITIONS**

### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

### **CONSTRUCTION OF NEW SOURCES**

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **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.

### **PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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#### **AIR EMISSION SUMMARY**

The air contaminant sources listed below comprise the Permit to Install for **Toledo Alfalfa Mills Inc** located in **LUCAS** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u>  | <u>BAT Determination</u>   | <u>Applicable Federal &amp; OAC Rules</u>            | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>   |
|-------------------------------|---|--|--|--|
| P001                          | Modification of alfalfa dryer & hammermill system by replacement of gas-fired furnace with coal-fired traveling grate furnace | Use of 1% or less sulfur content coal, firing rate of 1300 lbs/hr, maximum dry alfalfa feed rate of 6,800 lbs/hr | 3745-31-05<br>3745-17-07<br>3745-17-11<br>3745-18-06 | 30.9 lbs/hr Particulate<br>25.4 lbs/hr SO <sub>2</sub><br>20% opacity<br>54.2 tons/yr particulate matter<br>45 tons/yr SO <sub>2</sub> |

#### **SUMMARY**

#### **TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| Particulate      | 54.2             |
| Sulfur Dioxide   | 45               |

This condition in no way limits the applicability of any other state or federal regulation.

#### **APPLICABILITY**

**Toledo Alfalfa Mills Inc**  
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This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

### **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.

### **MALFUNCTION/ABATEMENT**

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Department of Environmental Services, 348 S. Erie Street, Toledo, Ohio 43602.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

1. This source shall be operated for no more than 3500 hours on a rolling 12-month basis. The maximum allowable feed rates for this source shall be:  
  
1300 pounds of coal per hour to the furnace;  
6800 pounds of dry alfalfa chop per hour to the hammermill.
2. Toledo Alfalfa Mills shall establish a coal sampling and analysis plan consistent with OAC rule 3745-18-04(D)(3)(c). Toledo Alfalfa Mills may either:
  - a. Obtain one sample per truckload or carload received. At the end of the month, a composite sample will be made of the individual samples taken from the coal shipments received that month. This composite sample will be tested for heat content, sulfur content and ash content.
  - b. Obtain a fuel supplier analyses from each shipment received. The fuel analyses shall identify heat

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content, ash content, and sulfur content of the coal shipment. Compliance with the applicable sulfur dioxide emission limit will be determined based on the weighted arithmetic average of all fuel supplier analyses for each calendar month.

3. Toledo Alfalfa Mills shall keep records documenting the following:
  - a. the amount of coal received each month.
  - b. the amount of coal burned each month.
  - c. the ash, sulfur, and heat content as required in term and condition #2 above.

These records shall be maintained by the facility for 3 years and shall be made available, upon request, to personnel from the Environmental Services Division or the Ohio EPA.