



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
COSHOCOTON 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: 06-08295**

**Fac ID: 0616010087**

**DATE: 8/14/2007**

Coshocton Ethanol LLC  
Russ Zeeck  
18137 County Rd 271  
Coshocton, OH 43812

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

SEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

**FINAL PERMIT TO INSTALL 06-08295**

Application Number: 06-08295  
Facility ID: 0616010087  
Permit Fee: **\$3500**  
Name of Facility: Coshocton Ethanol LLC  
Person to Contact: Russ Zeeck  
Address: 18137 County Rd 271  
Coshocton, OH 43812

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**County Road 271**  
**Coshocton, Ohio**

Description of proposed emissions unit(s):  
**Natural gas fired boilers and natural gas fired DDGS dryer and baghouses and storage tanks.**

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



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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

**Coshocton Ethanol LLC**  
**PTI Application: 06-08295**  
**Issued: 8/14/2007**

**Facility ID: 0616010087**

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)**

**Coshocton Ethanol LLC**  
**PTI Application: 06-08295**  
**Issued: 8/14/2007**

**Facility ID: 0616010087**

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.

Coshocton Ethanol LLC  
 PTI Application: 06-08295  
 Issued: 8/14/2007

Facility ID: 0616010087

**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>
carbon monoxide	86.57
nitrogen oxides	53.34
volatile organic compounds	26.12
particulate	5.88

7

**Coshocton Ethanol LLC**  
**PTI Application: 06-08295**  
**Issued: 8/14/2007**

**Facility ID: 0616010087**

Issued: 8/14/2007

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emission 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 emission 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 - B004 - 92 MMBtu/hr natural gas-fired boiler**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emission Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	<p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.045 lb/MMBtu of actual heat input, 4.14 lbs/hr, and 18.13 tons/yr.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.070 lb/MMBtu of actual heat input, 6.44 lbs/hr, and 28.21 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B).</p> <p>See Section A.2.a below.</p>
40 CFR Part 60, Subpart Dc	<p>Visible particulate emissions from the boiler stack shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.</p> <p>See Sections A.2.d and C.1 below.</p>
OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input.
OAC rule 3745-17-07(A)	The visible particulate emission limitations specified by this rule are less stringent than the visible particulate emission limitation specified in 40 CFR Part 60, Subpart Dc.
OAC rule 3745-18-06	See Section A.2.b below.
OAC rule 3745-21-08(B)	See Section A.2.c below.

**2. Additional Terms and Conditions**

- 2.a Pursuant to ORC section 3704.03(T)(4), the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the sulfur

**Issued: 8/14/2007**

dioxide, particulate, PM10, and volatile organic compound emissions from this air contaminant source since the uncontrolled potentials to emit for these pollutants are less than ten tons per year.

- 2.b** Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the sulfur dioxide emission limitations specified in OAC rule 3745-18-06 because the emissions unit only employs natural gas as fuel.
- 2.c** The design of the emissions unit and the technology associated with the current operating practices will satisfy the requirement to minimize the carbon monoxide emissions from this emissions unit.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** The visible particulate emission standard specified above apply at all times, except during periods of startup, shutdown, or malfunction.

## **B. Operational Restrictions**

- 1. The permittee shall burn only natural gas in this emissions unit.
- 2. If the permittee initiates construction of emissions units B004 and B005 pursuant to this permit to install, the permittee is prohibited from constructing emissions units B001 through B003 under Permit to Install 06-07704, issued on May 18, 2006.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. Pursuant to 40 CFR Part 60, Subpart Dc, the permittee shall record and maintain records of the amount of natural gas combusted during each day. These records shall be maintained by the permittee for a period of two years following the date of such record.
- 2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this

Emissions Unit ID: **B004**

emissions unit.

3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the natural gas usage, in standard cubic feet; and
  - b. the monthly fuel heat input, in MMBtu.
4. The permittee shall maintain annual records of the fuel heat input for the calendar year, in MMBtu.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the emissions unit. These reports shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day during which records were not maintained on the amount of natural gas combusted in the emissions unit. These reports shall be submitted within 30 days after the deviation occurs.
3. The permittee shall also submit annual reports that specify the total NO<sub>x</sub> and CO emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
4. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date); and
  - d. date of performance testing (if required, at least 30 days prior to testing).

Emissions Unit ID: **B004**

**Issued: 8/14/2007**

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permitting Section  
P.O. Box 1049  
Columbus, Ohio 43216-1049

**Issued: 8/14/2007**

and

Southeast District Office of the Ohio EPA  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138.

## **E. Testing Requirements**

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

- a. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 0.045 lb/MMBtu of actual heat input, 4.14 lbs/hr, and 18.13 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the vendor-supplied emission factor of 0.045 lb NO<sub>x</sub> /MMBtu by the maximum fuel heat input rate of 92 MMBtu/hr. Compliance shall be verified through emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the NO<sub>x</sub> emission factor, in lb NO<sub>x</sub>/MMBtu, established during the most recent emission test performed on emissions unit B004 or B005, by the annual fuel heat input, in MMBtu, recorded in accordance with Section C.3. above and by 0.0005 ton/lb.

- b. Emission Limitations:

CO emissions shall not exceed 0.070 lb/MMBtu of actual heat input, 6.44 lbs/hr, and 28.21 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the vendor-supplied emission factor of 0.070 lb CO/MMBtu by the maximum fuel heat input rate of 92 MMBtu/hr. Compliance shall be verified

**Issued: 8/14/2007**

through emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the CO emission factor, in lb NO<sub>x</sub>/MMBtu, established during the most recent emission test performed on emissions unit B004 or B005, by the annual fuel heat input, in MMBtu, recorded in accordance with Section C.3 above and by 0.0005 ton/lb.

c. Emission Limitation:

PE shall not exceed 0.020 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated based upon the emission factor of 0.001863 lb PE/MMBtu (from AP-42, Table 1.4-2, July 1998.)

If required, compliance with this emission limitation shall be determined according to test Methods 1 through 5, as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" and the procedures specified in OAC rule 3745-17-03(B)(9).

d. Emission Limitation:

Visible particulate emissions from the boiler stack shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

2. The permittee shall conduct, or have conducted, emission testing on at least one of the following emissions units: B004 or B005, in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not

Emissions Unit ID: **B004**

later than 180 days after initial start-up of the first boiler.

- b. The emission testing shall be conducted to demonstrate compliance with the lb/MMBtu and lbs/hr emission limitations for NO<sub>x</sub> and CO.
- c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations: for NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A; and for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. 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, Southeast District Office refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA, Southeast District Office 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office 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 Ohio EPA, Southeast District Office.
- h. The testing required by this section (E.2.) shall be repeated every 5 years after the initial test, with the boiler tested being rotated with each test.

## **F. Miscellaneous Requirements**

**Issued: 8/14/2007**

Emissions Unit ID: **B004**

None

Issued: 8/14/2007

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emission 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 emission 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 - B005 - 92 MMBtu/hr natural gas-fired boiler**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emission Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	<p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.045 lb/MMBtu of actual heat input, 4.14 lbs/hr, and 18.13 tons/yr.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.070 lb/MMBtu of actual heat input, 6.44 lbs/hr, and 28.21 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B).</p> <p>See Section A.2.a below.</p>
40 CFR Part 60, Subpart Dc	<p>Visible particulate emissions from the boiler stack shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.</p> <p>See Sections A.2.d and C.1 below.</p>
OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input.
OAC rule 3745-17-07(A)	The visible particulate emission limitations specified by this rule are less stringent than the visible particulate emission limitation specified in 40 CFR Part 60, Subpart Dc.
OAC rule 3745-18-06	See Section A.2.b below.
OAC rule 3745-21-08(B)	See Section A.2.c below.

**2. Additional Terms and Conditions**

- 2.a Pursuant to ORC section 3704.03(T)(4), the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the sulfur

Emissions Unit ID: **B005**

dioxide, particulate, PM10, and volatile organic compound emissions from this air contaminant source since the uncontrolled potentials to emit for these pollutants are less than ten tons per year.

- 2.b** Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the sulfur dioxide emission limitations specified in OAC rule 3745-18-06 because the emissions unit only employs natural gas as fuel.
- 2.c** The design of the emissions unit and the technology associated with the current operating practices will satisfy the requirement to minimize the carbon monoxide emissions from this emissions unit.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** The visible particulate emission standard specified above apply at all times, except during periods of startup, shutdown, or malfunction.

## **B. Operational Restrictions**

- 1. The permittee shall burn only natural gas in this emissions unit.
- 2. If the permittee initiates construction of emissions units B004 and B005 pursuant to this permit to install, the permittee is prohibited from constructing emissions units B001 through B003 under Permit to Install 06-07704, issued on May 18, 2006.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. Pursuant to 40 CFR Part 60, Subpart Dc, the permittee shall record and maintain records of the amount of natural gas combusted during each day. These records shall be maintained by the permittee for a period of two years following the date of such record.
- 2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

**Issued: 8/14/2007**

3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the natural gas usage, in standard cubic feet; and
  - b. the monthly fuel heat input, in MMBtu.
4. The permittee shall maintain annual records of the fuel heat input for the calendar year, in MMBtu.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the emissions unit. These reports shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day during which records were not maintained on the amount of natural gas combusted in the emissions unit. These reports shall be submitted within 30 days after the deviation occurs.
3. The permittee shall also submit annual reports that specify the total NO<sub>x</sub> and CO emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
4. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date); and
  - d. date of performance testing (if required, at least 30 days prior to testing).

**Coshocton Ethanol LLC**  
**DTI Application: 06 08205**

**Facility ID: 0616010087**

**Emissions Unit ID: B005**

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permitting Section  
P.O. Box 1049  
Columbus, Ohio 43216-1049

**Issued: 8/14/2007**

and

Southeast District Office of the Ohio EPA  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138.

## **E. Testing Requirements**

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

- a. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 0.045 lb/MMBtu of actual heat input, 4.14 lbs/hr, and 18.13 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the vendor-supplied emission factor of 0.045 lb NO<sub>x</sub> /MMBtu by the maximum fuel heat input rate of 92 MMBtu/hr. Compliance shall be verified through emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the NO<sub>x</sub> emission factor, in lb NO<sub>x</sub>/MMBtu, established during the most recent emission test performed on emissions unit B004 or B005, by the annual fuel heat input, in MMBtu, recorded in accordance with Section C.3. above and by 0.0005 ton/lb.

- b. Emission Limitations:

CO emissions shall not exceed 0.070 lb/MMBtu of actual heat input, 6.44 lbs/hr, and 28.21 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the vendor-supplied emission factor of 0.070 lb CO/MMBtu by the

**Issued: 8/14/2007**

maximum fuel heat input rate of 92 MMBtu/hr. Compliance shall be verified through emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the CO emission factor, in lb NO<sub>x</sub>/MMBtu, established during the most recent emission test performed on emissions unit B004 or B005, by the annual fuel heat input, in MMBtu, recorded in accordance with Section C.3 above and by 0.0005 ton/lb.

c. Emission Limitation:

PE shall not exceed 0.020 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated based upon the emission factor of 0.001863 lb PE/MMBtu (from AP-42, Table 1.4-2, July 1998.)

If required, compliance with this emission limitation shall be determined according to test Methods 1 through 5, as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" and the procedures specified in OAC rule 3745-17-03(B)(9).

d. Emission Limitation:

Visible particulate emissions from the boiler stack shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

2. The permittee shall conduct, or have conducted, emission testing on at least one of the following emissions units: B004 or B005, in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the

Emissions Unit ID: **B005**

maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial start-up of the first boiler.

- b. The emission testing shall be conducted to demonstrate compliance with the lb/MMBtu and lbs/hr emission limitations for NO<sub>x</sub> and CO.
- c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations: for NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A; and for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. 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, Southeast District Office refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA, Southeast District Office 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office 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 Ohio EPA, Southeast District Office.
- h. The testing required by this section (E.2.) shall be repeated every 5 years after the initial test, with the boiler tested being rotated with each test.

**Issued: 8/14/2007**

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emission Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emission 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 - P011 - 87.0 MMBtu/hr DDGS dryer and cooler controlled with a cyclone and 8.0 MMBtu/hr regenerative thermal oxidizer**

Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 3.90 lbs/hr and 17.08 tons/yr.</p> <p>Carbon monoxide (CO) emissions shall not exceed 6.88 lbs/hr and 30.15 tons/yr.</p> <p>Particulate emissions (PE) shall not exceed 3.00 lbs/hr and 13.12 tons/yr.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 5.67 lbs/hr and 24.84 tons/yr.</p> <p>Acetaldehyde emissions shall not exceed 0.14 lb/hr and 0.62 ton/yr.</p> <p>Visible particulate emissions from the regenerative thermal oxidizer stack shall not exceed 5% opacity as a 6-minute average.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-08(B).</p>
OAC rule 3745-17-07(A)(1) OAC rule 3745-17-10(B)(1)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06	See Section A.2.a below.
OAC rule 3745-21-08(B)	See Section A.2.b below.

**Coshocton Ethanol LLC**  
**DTI Application: 06 08205**

**Facility ID: 0616010087**

**Emissions Unit ID: P011**

Issued: 8/14/2007

## 2. Additional Terms and Conditions

- 2.a** Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the sulfur dioxide emission limitations specified in OAC rule 3745-18-06 because the emissions unit only employs natural gas as fuel.
- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** Pursuant to ORC section 3704.03(T)(4), the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the sulfur dioxide, and PM10 emissions from this air contaminant source since the uncontrolled potentials to emit for these pollutants are less than ten tons per year.
- 2.d** The annual allowable emission rate is based on the annual production of 75,000,000 gallons of 200 proof ethanol which is denatured (at 5%) with 3,750,000 gallons of gasoline (78,750,000 gallons total). Since the facility annual production rate is equivalent to the maximum capacity of emissions unit P003 (Fermentation and Beer Well), no operational restrictions, monitoring, recordkeeping or reporting requirements are necessary to ensure that this emissions unit does not exceed its annual allowable emission rates.

## B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. If the permittee initiates construction of emissions unit P011 pursuant to this permit to install, the permittee is prohibited from constructing emissions units P005 and P006 under Permit to Install 06-07704, issued on May 18, 2006.

Issued: 8/14/2007

**C. Monitoring and/or Recordkeeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the regenerative thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. 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 stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;

Emissions Unit ID: P011

- 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.
4. The permit to install for this emissions unit [P011] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: acetaldehyde  
TLV (ug/m3): 33,195 (Converted from the STEL)  
Maximum Hourly Emission Rate (lbs/hr): 2.10\*  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 233  
MAGLC (ug/m3): 790
- \* Modeled for emissions units P003, P011, and P007, combined.
5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower

**Issued: 8/14/2007**

Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs, Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices";

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a

Emissions Unit ID: P011

fuel other than natural gas was burned in the emissions unit. These reports shall be submitted within 30 days after the deviation occurs.

2. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer does not comply with the temperature limitation specified above. These deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office 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 these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 3.90 lbs/hr and 17.08 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation shall be demonstrated based on emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emissions unit-specific NO<sub>x</sub> emission factor, in lbs/hr, established during the most recent emission test by the maximum operating schedule of 8760 hours/year and by 0.0005 ton/lb.

- b. Emission Limitations:

CO emissions shall not exceed 6.88 lbs/hr and 30.15 tons/yr.

Applicable Compliance Methods:

**Issued: 8/14/2007**

Compliance with the hourly emission limitation shall be demonstrated based on emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emissions unit-specific CO emission factor, in lbs/hr, established during the most recent emission test by the maximum operating schedule of 8760 hours/year and by 0.0005 ton/lb.

c. Emission Limitations:

PE shall not exceed 3.00 lbs/hr and 13.12 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation shall be demonstrated based on emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emissions unit-specific PE emission factor, in lbs/hr, established during the most recent emission test by the maximum operating schedule of 8760 hours/year and by 0.0005 ton/lb.

d. Emission Limitations:

VOC emissions shall not exceed 5.67 lbs/hr and 24.84 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation shall be demonstrated based on emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emissions unit-specific VOC emission factor, in lbs/hr, established during the most recent emission test by the maximum operating schedule of 8760 hours/year and by 0.0005 ton/lb.

e. Emission Limitation:

Visible particulate emissions from the regenerative thermal oxidizer stack shall not exceed 5% opacity as a six-minute average.

Emissions Unit ID: P011

## Applicable Compliance Method:

Compliance shall be demonstrated based on emission testing performed in accordance with Section E.2.

## f. Emission Limitations:

Acetaldehyde emissions shall not exceed 0.14 lb/hr and 0.62 ton/yr.

## Applicable Compliance Methods:

Compliance with the hourly emission limitation shall be demonstrated based on emission testing performed in accordance with Section E.2.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emissions unit-specific acetaldehyde emission factor, in lb/hr, established during the most recent emission test by the maximum operating schedule of 8760 hours/year and by 0.0005 ton/lb.

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 after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial start-up of the emissions unit and, for VOC, every 5 years thereafter.
  - b. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for NO<sub>x</sub>, CO, PE, VOC, acetaldehyde, and the visible particulate emission limitation. Through the use of the Midwest Scaling Protocol, the testing shall also measure emissions of acrolein, methanol, and formaldehyde.
  - c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations and/or specific organic compound measurements: for NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; for VOC (including acetaldehyde, acrolein, methanol, and formaldehyde), Methods 1 through 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A and/or Method 0011 of SW-846 (as indicated by

Emissions Unit ID: P011

the Midwest Scaling Protocol); and for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
- e. The hourly VOC and acetaldehyde emission rates shall be determined in accordance with the test methods and procedures specified in the Midwest Scaling Protocol or an alternative U.S. EPA-approved method. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. 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, Southeast District Office refusal to accept the results of the emission test(s).
- g. Personnel from the Ohio EPA, Southeast District Office 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.
- h. A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office 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 Ohio EPA, Southeast District Office.
- i. If the initial emission test demonstrates that acetaldehyde emissions are 75% or more of the permit limitation, the permittee shall conduct emission testing for acetaldehyde, acrolein, methanol and formaldehyde as specified in this section (E.2.) every 5 years.

**Coshocton Ethanol LLC**  
DTI Application: 06 08205

**Facility ID: 0616010087**

**Emissions Unit ID: P011**

**F. Miscellaneous Requirements**

None

Issued: 8/14/2007

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emission 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 emission 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 - P913 - Grain storage, cleaning and reclaim controlled with baghouses**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emission Limitations/Control Measures</b>
OAC rule 3745-31-05(C)	Particulate emissions shall not exceed 2.76 tons per year.  See Section A.2.a below.
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 3745-17-07(B)	See Section A.2.b below.
OAC rule 3745-17-08(B)	See Section A.2.c below.
OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 50.2 pounds per hour.
40 CFR Part 60, Subpart DD	See Section A.2.d below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 06-08295 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding best available technology requirements under OAC rule 3745-31-05(A)(3), pursuant to ORC section 3704.03(T)(4).

The equipment used to control particulate emissions from this air contaminant source are listed below:

- i. for grain storage, the use of baghouses to control emissions from the grain storage silos and the upper distributor belt conveyor transfer points for each silo;
- ii. for grain cleaning/scalping, use of an enclosure; and

**Issued: 8/14/2007**

- iii. for grain reclaim, the use of total enclosures vented to a baghouse.
- 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 emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.d** 40 CFR Part 60, Subpart DD (Standards of Performance for Grain Elevators), is applicable to grain elevators with a permanent grain storage capacity greater than 2.5 million U.S. bushels. The permanent grain storage capacity of this facility is 432,000 bushels. Therefore, 40 CFR Part 60, Subpart DD, is not applicable.

**B. Operational Restrictions**

- 1. If the permittee initiates construction of emissions unit P913 pursuant to this permit to install, the permittee is prohibited from constructing emissions unit P903 under Permit to Install 06-07704, issued on May 18, 2006.

**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 particulate emissions from the baghouse stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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

Emissions Unit ID: P913

- 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 identify all days during which any visible particulate emissions were observed from the baghouse stacks serving this emissions unit and describe any corrective actions taken to minimize or eliminate the visible particulate emissions from the baghouse stacks serving this emissions unit. These reports shall be submitted to the Ohio EPA, Southeast District Office 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 these terms and conditions shall be determined in accordance with the following methods:

- a. 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 shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

**Issued: 8/14/2007**

Particulate emissions shall not exceed 50.2 pounds per hour.

Applicable Compliance Method:

If required, compliance with the mass emission limitation shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" and the procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

Particulate emissions shall not exceed 2.76 tons per year.

**Issued: 8/14/2007**

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated using the following calculation based upon the baghouse designs and maximum operating schedule:

$0.00525 \text{ gr/dscf} \times 1 \text{ lb/7000 gr} \times 14000 \text{ cfm (combined total)} \times 60 \text{ min/hr} \times 8760 \text{ hrs/yr} \times 0.0005 \text{ ton/lb} = 2.76 \text{ tons/yr total}$

**F. Miscellaneous Requirements**

None

Issued: 8/14/2007

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emission 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 emission 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 - T006 - Ethanol Shift Tank 1 - 180,000 gallons**

Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
OAC rule 3745-31-05(C)	Volatile organic compound emissions shall not exceed 0.20 ton per year.  See Section A.2.a below.
OAC rule 3745-21-09(L)	See Section A.2.b below.
40 CFR Part 60, Subpart Kb	See Sections A.2.c through A.2.i, C.1 through C.7, and D.1 through D.5 below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 06-08295 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding best available technology requirements under OAC rule 3745-31-05(A)(3), pursuant to ORC section 3704.03(T)(4).

The equipment used to control volatile organic compound emissions from this air contaminant source is listed below:

- i. internal floating roof.
- 2.b OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01(E)(13).
- 2.c The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.d The internal floating roof shall rest or float on the liquid surface (but not

Emissions Unit ID: T006

necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

- 2.e** Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
- i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- 2.f** Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- 2.g** Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- 2.h** Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is

Issued: 8/14/2007

being landed on the roof leg supports.

- 2.i Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- 2.j Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90% of the opening.
- 2.k Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- 2.l Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

## **B. Operational Restrictions**

- 1. The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 11.11 psi.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with Volatile Organic Liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- 2. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA,

Emissions Unit ID: T006

Southeast District Office in the inspection report required in Section D.4. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. For vessels equipped with a double-seal system as specified in Section A.2.e.ii:
  - a. the permittee shall visually inspect the vessel as specified in Section C.4 at least every 5 years; or
  - b. the permittee shall visually inspect the vessel as specified in Section C.2.
4. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Section C.2 and Section C.3.b and at intervals no greater than 5 years in the case of vessels specified in Section C.3.a.
5. The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be maintained for the life of the source.
6. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
7. The permittee shall keep a record of each inspection performed as required by Sections C.1 through C.4. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

Issued: 8/14/2007

**D. Reporting Requirements**

1. This emissions unit is subject to the applicable provisions of Subpart Kb of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and
- d. If required, date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permitting Section  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Ohio Environmental Protection Agency  
Southeast District Office  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138

2. The permittee shall notify the Ohio EPA, Southeast District Office, in writing, at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Sections C.1 and C.4. to afford the Ohio EPA the opportunity to have an observer present. If the inspection required by Section C.4 is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the

Emissions Unit ID: T006

tank, the owner or operator shall notify the Ohio EPA, Southeast District Office at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, Southeast District Office at least 7 days prior to the refilling.

3. The permittee shall furnish the Ohio EPA, Southeast District Office with a report that describes the control equipment and certifies that the control equipment meets the specifications of Sections A.2.d through A.2.l and C.1. This report shall be an attachment to the notification of the actual date of initial startup of an affected facility required by Section D.1.c and shall be postmarked within 15 days after such date.
4. If any of the conditions described in Section C.2 are detected during the annual visual inspection required by Section C.2, a report shall be furnished to the Ohio EPA, Southeast District Office within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
5. After each inspection required by C.3 that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in C.3.b, a report shall be furnished to the Ohio EPA, Southeast District Office within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of Sections A.2.d through A.2.l or C.3 and list each repair made.
6. If any organic liquid with a true vapor pressure greater than 11.11 psi is stored in this emissions unit, the permittee shall notify the Ohio EPA, Southeast District Office within 30 days.

## E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:  
  
Volatile organic compound emissions shall not exceed 0.20 ton per year.  
  
Applicable Compliance Method:  
  
Compliance shall be determined by calculations using the TANKS Program 4.0 or

**Issued: 8/14/2007**

other method acceptable to the Ohio EPA, Southeast District Office.

**F. Miscellaneous Requirements**

None

Issued: 8/14/2007

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emission 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 emission 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 - T007 - Ethanol Shift Tank 2 - 180,000 gallons**

Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
OAC rule 3745-31-05(C)	Volatile organic compound emissions shall not exceed 0.20 ton per year.  See Section A.2.a below.
OAC rule 3745-21-09(L)	See Section A.2.b below.
40 CFR Part 60, Subpart Kb	See Sections A.2.c through A.2.i, C.1 through C.7, and D.1 through D.5 below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 06-08295 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding best available technology requirements under OAC rule 3745-31-05(A)(3), pursuant to ORC section 3704.03(T)(4).

The equipment used to control volatile organic compound emissions from this air contaminant source is listed below:

- i. internal floating roof.
- 2.b OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01(E)(13).
- 2.c The fixed roof storage tank shall be equipped with an internal floating roof.
- 2.d The internal floating roof shall rest or float on the liquid surface (but not necessarily

Emissions Unit ID: T007

in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

- 2.e** Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
- i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- 2.f** Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- 2.g** Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- 2.h** Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

Issued: 8/14/2007

- 2.i Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- 2.j Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90% of the opening.
- 2.k Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- 2.l Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

**B. Operational Restrictions**

- 1. The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 11.11 psi.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with Volatile Organic Liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- 2. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA, Southeast District Office in the inspection report required in Section D.4. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company

Emissions Unit ID: **T007**

will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. For vessels equipped with a double-seal system as specified in Section A.2.e.ii:
  - a. the permittee shall visually inspect the vessel as specified in Section C.4 at least every 5 years; or
  - b. the permittee shall visually inspect the vessel as specified in Section C.2.
4. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Section C.2 and Section C.3.b and at intervals no greater than 5 years in the case of vessels specified in Section C.3.a.
5. The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be maintained for the life of the source.
6. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
7. The permittee shall keep a record of each inspection performed as required by Sections C.1 through C.4. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

#### **D. Reporting Requirements**

Emissions Unit ID: **T007**

1. This emissions unit is subject to the applicable provisions of Subpart Kb of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and
- d. If required, date of performance testing (at least 30 days prior to testing).

Issued: 8/14/2007

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permitting Section  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Ohio Environmental Protection Agency  
Southeast District Office  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138

2. The permittee shall notify the Ohio EPA, Southeast District Office, in writing, at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Sections C.1 and C.4. to afford the Ohio EPA the opportunity to have an observer present. If the inspection required by Section C.4 is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Ohio EPA, Southeast District Office at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, Southeast District Office at least 7 days prior to the refilling.
3. The permittee shall furnish the Ohio EPA, Southeast District Office with a report that describes the control equipment and certifies that the control equipment meets the specifications of Sections A.2.d through A.2.l and C.1. This report shall be an attachment to the notification of the actual date of initial startup of an affected facility required by Section D.1.c and shall be postmarked within 15 days after such date.
4. If any of the conditions described in Section C.2 are detected during the annual visual inspection required by Section C.2, a report shall be furnished to the Ohio EPA, Southeast District Office within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
5. After each inspection required by C.3 that finds holes or tears in the seal or seal fabric, or

**Issued: 8/14/2007**

defects in the internal floating roof, or other control equipment defects listed in C.3.b, a report shall be furnished to the Ohio EPA, Southeast District Office within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of Sections A.2.d through A.2.i or C.3 and list each repair made.

6. If any organic liquid with a true vapor pressure greater than 11.11 psi is stored in this emissions unit, the permittee shall notify the Ohio EPA, Southeast District Office within 30 days.

**E. Testing Requirements**

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation:

Volatile organic compound emissions shall not exceed 0.20 ton per year.

Applicable Compliance Method:

Compliance shall be determined by calculations using the TANKS Program 4.0 or other method acceptable to the Ohio EPA, Southeast District Office.

**F. Miscellaneous Requirements**

None

Issued: 8/14/2007

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emission 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 emission 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 - T008 - Gasoline denaturant storage tank - 65,000 gallons**

Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
OAC rule 3745-31-05(C)	Volatile organic compound emissions shall not exceed 0.88 ton per year.  See Section A.2.a below.
OAC rule 3745-21-09(L)	See Section A.2.b below.
40 CFR Part 60, Subpart Kb	See Sections A.2.c through A.2.I, C.1 through C.7, and D.1 through D.5 below.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 06-08295 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding best available technology requirements under OAC rule 3745-31-05(A)(3), pursuant to ORC section 3704.03(T)(4).

The equipment used to control volatile organic compound emissions from this air contaminant source is listed below:

- i. internal floating roof.
- 2.b The requirements specified by this rule are equivalent to or less stringent than the requirements specified by 40 CFR Part 60, Subpart Kb.
- 2.c The fixed roof storage tank shall be equipped with an internal floating roof.

Emissions Unit ID: T008

- 2.d** The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- 2.e** Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
- i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- 2.f** Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- 2.g** Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- 2.h** Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being

Issued: 8/14/2007

landed on the roof leg supports.

- 2.i Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- 2.j Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90% of the opening.
- 2.k Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- 2.l Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

## **B. Operational Restrictions**

- 1. The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 11.11 psi.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with Volatile Organic Liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- 2. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA, Southeast District Office in the inspection

Emissions Unit ID: T008

report required in Section D.4. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

3. For vessels equipped with a double-seal system as specified in Section A.2.e.ii:
  - a. the permittee shall visually inspect the vessel as specified in Section C.4 at least every 5 years; or
  - b. the permittee shall visually inspect the vessel as specified in Section C.2.
4. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Section C.2 and Section C.3.b and at intervals no greater than 5 years in the case of vessels specified in Section C.3.a.
5. The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be maintained for the life of the source.
6. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
7. The permittee shall keep a record of each inspection performed as required by Sections C.1 through C.4. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

**D. Reporting Requirements**

1. This emissions unit is subject to the applicable provisions of Subpart Kb of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and
- d. If required, date of performance testing (at least 30 days prior to testing).

**Issued: 8/14/2007**

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permitting Section  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Ohio Environmental Protection Agency  
Southeast District Office  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138

2. The permittee shall notify the Ohio EPA, Southeast District Office, in writing, at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Sections C.1 and C.4 to afford the Ohio EPA the opportunity to have an observer present. If the inspection required by Section C.4 is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Ohio EPA, Southeast District Office at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, Southeast District Office at least 7 days prior to the refilling.
3. The permittee shall furnish the Ohio EPA, Southeast District Office with a report that describes the control equipment and certifies that the control equipment meets the specifications of Sections A.2.d through A.2.l and C.1. This report shall be an attachment to the notification of the actual date of initial startup of an affected facility required by Section D.1.c and shall be postmarked within 15 days after such date.
4. If any of the conditions described in Section C.2 are detected during the annual visual inspection required by Section C.2, a report shall be furnished to the Ohio EPA, Southeast District Office within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
5. After each inspection required by C.3 that finds holes or tears in the seal or seal fabric, or

**Issued: 8/14/2007**

defects in the internal floating roof, or other control equipment defects listed in C.3.b, a report shall be furnished to the Ohio EPA, Southeast District Office within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of Sections A.2.d through A.2.l or C.3 and list each repair made.

6. If any organic liquid with a true vapor pressure greater than 11.11 psi is stored in this emissions unit, the permittee shall notify the Ohio EPA, Southeast District Office within 30 days.

**E. Testing Requirements**

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation:

Volatile organic compound emissions shall not exceed 0.88 ton per year.

Applicable Compliance Method:

Compliance shall be determined by calculations using the TANKS Program 4.0 or other method acceptable to the Ohio EPA, Southeast District Office.

**F. Miscellaneous Requirements**

None

Emissions Unit ID: **T008**

SIC CODE 2869 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID B004  
 EMISSIONS UNIT DESCRIPTION 92 MMBtu/hr natural gas-fired boiler  
 DATE INSTALLED not installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Emissions		.020 lb/MMBtu		.020 lb/MMBtu	
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides		.046 lb/MMBtu; 4.14 lbs/hr	18.13	.046 lb/MMBtu; 4.14 lbs/hr	18.13
Carbon Monoxide		.070 lb/MMBtu; 6.44 lbs/hr	28.21	.070 lb/MMBtu; 6.44 lbs/hr	28.21
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Dc** NESHAP? **NA** PSD? **NA** OFFSET POLICY? **NA**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** see permit terms - pollutants over ten tons per year

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

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

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

Emissions Unit ID: T008

SIC CODE 2869 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID B005  
 EMISSIONS UNIT DESCRIPTION 92 MMBtu/hr natural gas-fired boiler  
 DATE INSTALLED not installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		020 lb/MMBtu		.020 lb/MMBtu	
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides		046 lb/MMBtu; 4.14 lbs/hr	18.13	.046 lb/MMBtu; 4.14 lbs/hr	18.13
Carbon Monoxide		.070 lb/MMBtu; 6.44 lbs/hr	28.21	.070 lb/MMBtu; 6.44 lbs/hr	28.21
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Dc** NESHAP? **NA** PSD? **NA** OFFSET POLICY? **NA**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** see permit terms - pollutants over ten tons per year

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

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

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

Emissions Unit ID: T008

SIC CODE 2869 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID P011  
 EMISSIONS UNIT DESCRIPTION 87.0 MMBtu/hr DDGS dryer and cooler controlled with a cyclone and 8.0 MMBtu/hr regenerative thermal oxidizer  
 DATE INSTALLED not installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Emissions		3.0 lbs/hr	13.12	3.0 lbs/hr	13.12
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds		5.67 lbs/hr	24.84	5.67 lbs/hr	24.84
Nitrogen Oxides		3.90 lbs/hr	17.08	3.90 lbs/hr	17.08
Carbon Monoxide		6.88 lbs/hr	30.15	6.88 lbs/hr	30.15
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **NA** NESHAP? NA PSD? **NA** OFFSET POLICY? **NA**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** see permit terms - pollutants over ten tons per year

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

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

IDENTIFY THE AIR CONTAMINANTS: acetaldehyde

Emissions Unit ID: **T008**

Issued: 8/14/2007

SIC CODE  SCC CODE  EMISSIONS UNIT ID   
 EMISSIONS UNIT DESCRIPTION   
 DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Emissions			2.76	50.2 lbs/hr	< 10
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **DD** (not applicable)

NESHAP? **NA**

PSD? **NA**

OFFSET POLICY? **NA**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** see permit terms - pollutants over ten tons per year

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?  YES  NO

IDENTIFY THE AIR CONTAMINANTS:

Emissions Unit ID: T008

SIC CODE  SCC CODE  EMISSIONS UNIT ID   
 EMISSIONS UNIT DESCRIPTION   
 DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds			0.204		<10
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Kb** NESHAP? **NA** PSD? **NA** OFFSET POLICY? **NA**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination see permit terms - pollutants over ten tons per year

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

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

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

**Coshocton Ethanol LLC**  
**PTI Application: 06-08295**  
**Issued: 8/14/2007**

**Facility ID: 0616010087**

Emissions Unit ID: **T008**

SIC CODE 2869 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID T007  
 EMISSIONS UNIT DESCRIPTION Ethanol Shift Tank 2 - 180,000 gallons  
 DATE INSTALLED not installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds			0.204		<10
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Kb** NESHAP? **NA** PSD? **NA** OFFSET POLICY? **NA**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

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

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

Emissions Unit ID: **T008****Issued: 8/14/2007**

SIC CODE  SCC CODE  EMISSIONS UNIT ID   
 EMISSIONS UNIT DESCRIPTION   
 DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds			0.879		<10
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Kb**NESHAP **NA**PSD? **NA**OFFSET POLICY? **NA**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** see permit terms - pollutants over ten tons per yearIS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? noOPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? **TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_

YES

\_\_\_\_ NO

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