

Facility ID: 0448020004 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit P001](#)

[Go to Part II for Emissions Unit P004](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020004 Emissions Unit ID: P001 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
alfalfa dryer and hammermill with a dry cyclone dust collector	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) shall not exceed 30.9 pounds per hour
		sulfur dioxide emissions (SO2) shall not exceed 25.4 pounds per hour
		see Section A.2.a
	OAC rule 3745-31-05(C)	PE shall not exceed 54.2 tons as a rolling, 12-month summation
		SO2 shall not exceed 45 tons as a rolling, 12-month summation
	OAC 3745-17-07(A)(1)	visible emissions (VE) from the stack shall not exceed 20% opacity as a six-minute average, except as provided by rule
		see Section A.2.b
	OAC 3745-17-11(B)(1)	see Section A.2.b
	OAC 3745-18-06(E)(2)	

2. **Additional Terms and Conditions**
 - (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 3,500 as a rolling, 12-month summation of the operating hours.
2. The coal burned in this emissions unit shall contain less than or equal to 1.0% sulfur on a dry basis.
3. The monthly averaged coal firing rate shall not exceed 1,300 pounds per hour.
4. The monthly averaged dry alfalfa feed rate to the hamermill shall not exceed 6,800 pounds per hour.

C. Monitoring and/or Record Keeping 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 stack serving this emissions unit. The presence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.
2. The permittee shall maintain monthly records of the following information:
 - a. the hours of operation;
 - b. the rolling, 12-month summation of the hours of operation;
 - c. the total weight of coal burned in the dryer, in pounds;
 - d. the averaged coal firing rate to the dryer (c/a), in pounds per hour;
 - e. the total weight of dry feed processed in the the dryer, in pounds; and
 - f. the averaged hourly feed rate to the dryer (e/a), in pounds per hour.

Note: the total weight of dry feed processed in the the dryer may be calculated as $(y)(100-z)/100$ where y is the total weight of wet feed processed in the dryer and z is the average water content of the wet feed as a weight percent.

3. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Toledo Division of Environmental Services or Ohio EPA.
4. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses (dry basis) for heat content, sulfur content and ash content.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports which:
 - 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 abnormal visible particulate emissions.
2. The permittee shall submit semiannual deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the number of operating hours exceeded the rolling, 12-month limitation;
 - b. an identification of each shipment of coal where the 1.0% sulfur limitation was exceeded;
 - c. an identification of each month during which the averaged coal firing rate exceeded 1,300 pounds per hour; and
 - d. an identification of each month during which the averaged feed rate exceeded 6,800 pounds per hour.
3. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period. These reports shall also summarize the monthly quantities recorded above. If no deviations occurred during the 6-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that 6-month period.

E. Testing Requirements

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

VE from the stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.
Emission Limitation:

PE shall not exceed 30.9 pounds per hour

Applicable Compliance Method:

Compliance may be demonstrated through calculations performed as follows: multiply the emission factor determined in the most recent stack test which demonstrated compliance with the emissions limitation (0.0036 pound PE per pound dry alfalfa based on stack testing performed 7/99) by the dry alfalfa feed rate (pounds dry alfalfa per hour).

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.
Emission Limitation:

PE shall not exceed 54.2 tons as a rolling, 12-month summation

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the allowable hourly particulate emissions rate (30.9 pounds per hour) and 3,500 hours of operation. Therefore, if compliance is shown with the hourly emissions limitation and the rolling, 12-month hours of operation limitation, compliance shall also be shown with the annual emission limitation.

Emission Limitation:

SO2 shall not exceed 25.4 pounds per hour

Applicable Compliance Method:

Compliance may be demonstrated through calculations performed as follows: multiply the emission factor determined in the most recent stack test which demonstrated compliance with the emissions limitation (0.0013 pound SO2 per combined weight of coal and dry alfalfa in pounds, based on stack testing performed 7/99) by the combined weight of coal and alfalfa (pounds per hour).

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

Emission Limitation:

SO2 shall not exceed 45 tons as a rolling, 12-month summation

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the allowable hourly particulate emissions rate (25.4 pounds per hour) and 3,500 hours of operation. Therefore, if compliance is shown with the hourly emissions limitation and the rolling, 12-month hours of operation limitation, compliance shall also be shown with the annual emission limitation.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: Sections A, B, C, D, E, F.
2. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 04-263, as issued on July 16, 1997: sections A - F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020004 Emissions Unit ID: P004 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pellet mill and cooler with a dry cyclone dust collector	OAC 3745-17-07(A)(1)	visible emissions (VE) from the stack shall not exceed 20% opacity as a six-minute average, except as provided by rule
	OAC 3745-17-11(B)(1)	particulate emissions (PE) shall not exceed 12 pounds per hour
	OAC rule 3745-35-07(B)(2)	PE shall not exceed 21 tons per year as a rolling, 12-month summation

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 3,500 as a rolling, 12-month summation of the operating hours.
2. The monthly averaged dry alfalfa feed rate to the hamermill shall not exceed 6,800 pounds per hour.

C. Monitoring and/or Record Keeping 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 stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.
2. The permittee shall maintain monthly records of the following information:
 - a. the hours of operation;
 - b. the rolling, 12-month summation of the hours of operation;
 - c. the total weight of dry feed processed, in pounds; and
 - d. the averaged hourly feed rate (c/a), in pounds per hour.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports which:
 - 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 abnormal visible particulate emissions.
2. The permittee shall submit semi-annual deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the number of operating hours exceeded the rolling, 12-month limitation; and
 - b. an identification of each month during which the averaged dry feed rate exceeded 6,800 pounds per hour.
3. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period. These reports shall also summarize the monthly quantities recorded above. If no deviations occurred during the 6-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that 6-month period.

E. Testing Requirements

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

Emission Limitation:

VE from the stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

Emission Limitation:

PE shall not exceed 12 pounds per hour

Applicable Compliance Method:

Compliance may be demonstrated through calculations performed as follows: multiply the emission factor determined in the most recent stack test which demonstrated compliance with the emissions limitation (0.00086 pounds of PE per pound of alfalfa pellets processed, 6/2000) by the dry alfalfa feed rate (pounds dry alfalfa per hour).

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

Emission Limitation:

PE shall not exceed 21 tons per year as a rolling, 12-month summation

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the allowable hourly particulate emissions rate (12 pounds per hour) and 3,500 hours of operation. Therefore, if compliance is shown with the hourly emissions limitation and the rolling, 12-month hours of operation limitation, compliance shall also be shown with the annual emission limitation.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: Sections A, B, C, D, E, F.