



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

7/30/2008

TOM ANDORFER
Bunge North America (East) LLC
751 EAST FARMING STREET
MARION, OH 43302

Certified Mail
Facility ID: 0351010002
Permit Number: P0087305
County: Marion

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Marion Star. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit
Bunge North America (East) LLC

Issue Date: 7/30/2008
Permit Number: P0087305
Permit Type: Renewal
Permit Description: Renewal Application
Facility ID: 0351010002
Facility Location: Bunge North America (East) LLC
751 EAST FARMING STREET,
MARION, OH 43302
Facility Description: Soybean Processing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control Title V operating permit for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Erin Shalabe at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: www.epa.state.oh.us/dapc

Statement of Basis For Title V Permit

Part I - General	
Company Name	Bunge North America (East) LLC
Premise Number	00351010002
What makes this facility a Title V facility?	VOC, PE, NOx, SO ₂ , HAPs
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any common control issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and	N/A

associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	
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Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1		40 CF R, Pa rt 63	States applicability of MACT rule, Subpart DDDDD for emission units B001 and B002.
A.2		40 CF R, Pa rt 63	States applicability of MACT, Subpart A for emission units B001 and B002.
A.3		40 CF R, Pa rt 64	States applicability of CAM rule.
A.4	77-07		Lists insignificant emission units subject to a PTI and/or one or more applicable requirements.

X

Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
B003, B005, P012, P047, P905, P906	N/A	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
B004, P006, P015, P019, P027, P036, P040, P046, P901, P902, P903, P904	Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.
F002, F003, F004, F005, P901, P902, P903, P904, P905, P906	Exempt	17-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

F002, F003, F004, F005, P901, P902, P903, P904, P 9 0 5 , P906	Exempt	17-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
B003	N/A	17-10(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
B005	Particulate matter emissions shall not exceed 0.020 pound per million Btu of actual heat input	17-10(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on appropriate emission factors, maximum hourly fuel usage and dividing by maximum heat input capacity are sufficient to show compliance, therefore, no testing is required.
B004	0.37 pound particulate emissions (PE)/m mBtu of actual heat	17-10(C)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The quality of coal burned in this emissions unit shall meet, on an as-received basis, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 6.1 lbs/mmBtu of actual heat input. M & R includes ash content, sulfur content and heat content of coal. A CEM is not economically justified. CAM is not currently applicable.

	input (when combust ing coal)														
B004	0.020 pound PE/mm Btu of actual heat input (when combust ing only natural gas)	17-10(C)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of coal burned in this emissions unit shall meet, on an as-received basis, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 6.1 lbs/mmBtu of actual heat input. M & R includes ash content, sulfur content and heat content of coal. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on appropriate emission factors, maximum hourly fuel usage and dividing by maximum heat input capacity are sufficient to show compliance, therefore, no testing is required.
P006	66.8 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P012, P015, P036, P040, P046 P047, P049, P905, P906	N/A	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P019	23.6 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the maximum outlet grain loading, maximum flow rate, lb/7000 gr and 60 minutes per hour are sufficient to show compliance.
P025, P902, P903, P904	73.0 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the maximum outlet grain loading, maximum flow rate, lb/7000 gr and 60 minutes per hour are sufficient to show compliance.
P027	75.0 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the maximum outlet grain loading, maximum flow rate, lb/7000 gr and 60 minutes per hour are sufficient to show compliance.
P901	39.8 lbs	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the maximum outlet grain

	PE/hr															loading, maximum flow rate, lb/7000 gr and 60 minutes per hour are sufficient to show compliance.
B003, B005	N/A	18-06	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
B004	6.1 pounds sulfur dioxide (SO ₂)/m mBtu of actual heat input	18-57(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	N	OR-The quality of coal burned in this emissions unit shall meet, on an as-received basis, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 6.1 lbs/mmBtu of actual heat input. M & R includes ash content, sulfur content and heat content of coal and calculated SO ₂ rate. A CEM is not economically justified. CAM is not currently applicable. ET-This limitation is based on the maximum sulfur content of natural gas allowed for this emission unit and represents the worst case scenario emissions, therefore, no testing is required.
B003	N/A	21-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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. This regulation does not specify emission limitations for units that only fire natural gas. This regulation does not specify emission limitations for units that only fire natural gas. 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." M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
B003	4.61 lbs NOx/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B003	20.19 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B003	3.87 lbs CO/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B003	16.95 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B003	0.35 lb PE/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B003	1.53 tons PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable.

															ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B003	0.25 lb VOC/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B003	1.10 tons VOC/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B003	0.03 lb SO ₂ /hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B003	0.13 ton SO ₂ /yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B003	Visible PE shall not exceed 10% opacity, as a 6-minute average	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A COM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.
B005	8.76 tons PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable.

															ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B005	5.0 lbs NOx/hr	N	31- 05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B005	21.90 tons NOx/yr	N	31- 05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B005	8.24 lbs CO/hr	N	31- 05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B005	36.07 tons CO/yr	N	31- 05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B005	1.08 lbs VOC/hr	N	31- 05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B005	4.72 tons VOC/yr	N	31- 05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

B005	0.06 lb SO ₂ /hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
B005	0.26 ton SO ₂ /yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B005	Visible PE shall not exceed 5% opacity, as a 6-minute average	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A COM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.
F002	4.94 lbs fugitive PE/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Operation of emission unit for no more than 5040 hours per rolling 12-month period and shall dry no more than 90 tons per hour. M and R includes daily records of hours of operation and material throughput. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
F002	12.40 tons fugitive PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Operation of emission unit for no more than 5040 hours per rolling 12-month period and shall dry no more than 90 tons per hour. M and R includes daily records of hours of operation and material throughput. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
F002	4.84 lbs NO _x /hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Operation of emission unit for no more than 5040 hours per rolling 12-month period and shall dry no more than 90 tons per hour. M and R includes daily records of hours of operation and

															material throughput. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
F002	12.20 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Operation of emission unit for no more than 5040 hours per rolling 12-month period and shall dry no more than 90 tons per hour. M and R includes daily records of hours of operation and material throughput. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
F004	0.66 ton fugitive PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum annual throughput shall not exceed 100,800 tons of grain. M and R include weekly inspections of storage piles and monthly records of quantity of grain received and stored. A CEM is not economically justified. CAM is not applicable. ET-Calculations based on the appropriate emission factor and actual annual throughput are sufficient to show compliance.
F004	No visible emissions except for one minute during any one-hour observation period (grain receiving)	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum annual throughput shall not exceed 100,800 tons of grain. M and R include weekly inspections of storage piles and monthly records of quantity of grain received and stored. A CEM is not economically justified. CAM is not applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 observations being conducted.
F004	No visible emissions except for one minute	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum annual throughput shall not exceed 100,800 tons of grain. M and R include weekly inspections of storage piles and monthly records of quantity of grain received and stored. A CEM is not economically justified. CAM is not applicable.

	during any one-hour observation period (wind erosion)														ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 observations being conducted.
F005	18.92 tons fugitive PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the appropriate emission factor, the maximum hourly process weight rate, a capture efficiency of 70% and 8760 hours per year of operation are sufficient to show compliance.
P012	0.0025 gr PE/dscf	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
P012	0.48 tons PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P049	Visible PE shall not exceed 20% opacity, as a 6-minute average	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.
F005	4.61 tons fugitive PM ₁₀ /yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the appropriate emission factor, the maximum hourly process weight rate, a capture efficiency of 70% and 8760 hours per year of operation are sufficient to show compliance.
P015	0.99 lb PE/hr (bghs #1)	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
P015	0.39 ton PE/yr (bghs #1)	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

P015	0.93 lb PE/hr (bghs #2)	N	31-05(A) (3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
P015	4.07 tons PE/yr (bghs #2)	N	31-05(A) (3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P036	0.79 lb PE/hr	N	31-05(A) (3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P036	3.46 tons PE/yr	N	31-05(A) (3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P039, P040, P046	0.24 gal/ton crushed soybeans (0.000671 lb of hexane/lb crushed soybeans) based on a 365-day average	N	31-05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of non-photochemically reactive materials. M and R include records of use of photochemically reactive materials and records of hexane consumption and VOC emissions. A CEM is not economically justified. CAM is not applicable. ET-The M and R requirements in the permit are sufficient to show compliance.
P039, P040, P046	392 tons VOC (140,000 gallons of hexane) per rolling 12-month period	N	31-05(A) (3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of non-photochemically reactive materials. M and R include records of use of photochemically reactive materials and records of hexane consumption and VOC emissions. A CEM is not economically justified. CAM is not applicable. ET-The M and R requirements in the permit are sufficient to show compliance.
P039, P040,	65.32 tons VOC	N	31-05(A)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of non-photochemically reactive materials. M and R include records of use of

P046	per rolling 30 day period) (3)												photochemically reactive materials and records of hexane consumption and VOC emissions. A CEM is not economically justified. CAM is not applicable. ET-The M and R requirements in the permit are sufficient to show compliance.
P040	2.72 lbs PE/hr	N	31-05	N	N	Y	N	N	Y	N	Y	N	Y	N	
P040	2.72 lbs PM10/hr	N	31-05	N	N	Y	N	N	Y	N	Y	N	Y	N	
P046	0.01 gr PE/dscf (1.5 lbs PE/hr)	N	31-05	N	N	Y	N	N	Y	N	Y	N	Y	N	
P047	2.42 lbs PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P047	10.60 tons PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P047	1.45 lbs PM10/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P047	6.37 tons PM10/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P049	0.73 lb PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
P049	3.20 tons PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P905	7.75 tons fugitive PM10/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the appropriate emission factor, the maximum hourly process weight rate, a capture efficiency of 95% and 8760 hours per year of operation are sufficient to show compliance.
	23.65 tons		31-												ET-Calculations based on the appropriate emission

P905	fugitive PE/yr	N	05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	factor, the maximum hourly process weight rate, a capture efficiency of 95% and 8760 hours per year of operation are sufficient to show compliance.
P905	0.005 gr PM10/d scf	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P905	2.18 tons PM10/year	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P906	0.003 gr PE/dscf	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
P906	0.13 lb PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET- The limitation is based on the unit=s potential to emit, therefore, no testing is required.
P906	0.57 tons PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P906	2.10 tons fugitive PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the appropriate emission factor, the maximum hourly process weight rate, a capture efficiency of 70% and 8760 hours per year of operation are sufficient to show compliance.
P906	0.51 tons fugitive PM10/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the appropriate emission factor, the maximum hourly process weight rate, a capture efficiency of 70% and 8760 hours per year of operation are sufficient to show compliance.
B003, B005	N/A	N	40 CFR, Part 60, Sub part Dc	Y	N	N	N	N	N	N	N	N	N	N	ND-This regulation does not specify emission limitations for units that only fire natural gas. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P025	The permittee shall not cause to	N	40 CFR, Part 60, Sub part	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.

	be discharged into the atmosphere any fugitive emission emission from: any grain handling operation which exhibits greater than 10 percent opacity.		DD												
F002	None	N	40 CFR, Part 60, Sub part DD	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
F005, P906	The permittee shall not cause to be discharged into the atmosphere any fugitive emission from: Any	N	40 CFR, Part 60, Sub part DD	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.

	individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.														
P012	The permittee shall not cause to be discharged into the atmosphere from any affected facility, any process emission which exhibits greater than 0 percent opacity.	N	40 CFR, Part 60, Subpart DD	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.
P039	See Rule	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR, Part 63, Subpart GGGG
B003,	See Rule	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-40 CFR, Part 63, Subpart DDDDD

B004, B 0 0 5															M, R, Rp and ET-Requirements of 40 CFR, Part 63, Subpart DDDDD are not currently effective. The compliance date in the rule is 9/13/07.
P019, P 9 0 3 , P 9 0 5	See Specific Emission Unit	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR, Part 64
P906	No owner or operator shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which exhibits greater than 0 percent opacity.	N	40 CFR, Part 60, Sub part DD	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 observations being conducted.
P025	0.01 gr/dscf	N	U.S. EPA Consent Decr	N	N	Y	N	N	Y	N	Y	N	Y	N	

			ee												
P039, P040, P046	0.20 gal/ton	N	U.S. EPA Con sent Decr ee	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M and R requirements in the permit are sufficient to show compliance.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

X Instructions for Part III:

X All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

X If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an AN@ in the column under ASIP.@ If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a AY@ should be noted in the AOther@ column, and if not, an AN@ should be noted. If the basis for the term and condition is AOther,@ an explanation of the basis must be provided in the AComments@ section. If OAC rule 3745-31-05 is cited in the AOther@ column, please indicate in the AComments@ section whether or not all of the requirements have been transferred from the permit to install.

§ To complete the remainder of the table after ABasis,@ except for the AComments@ section, simply specify a AY@ for yes or an AN@ for no. For the AM,@ AR,@ ARp,@ and AET@ columns, if AN@ is specified, there should be a brief explanation in the AComments@ section as to why there are no requirements. If a brief explanation is provided in the AComments@ section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the AComments@ section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or

minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the Monitoring, Record Keeping, or Reporting requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the Monitoring, Record Keeping, or Reporting requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the Comments section would be sufficient.

Also, if a Y is noted under OR, Misc, ASt, AND, or ENF an explanation of the requirements must be provided in the Comments section. In addition to a general explanation of the OR, Misc, ASt, AND, and/or ENF the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
 2. If a control plan and schedule is included in the Miscellaneous Requirements section of the permit, provide an explanation in the Comments section of the violation, basis for the violation, and the company's proposed control plan and schedule.
 3. If the AND column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
- A. If the ENF column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an N is noted in the OR, Misc, ASt, AND, or ENF columns.

X **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the N/A in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the Comments area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain N/A when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Title V Permit
for
Bunge North America (East) LLC**

Facility ID: 0351010002

Permit Number: P0087305

Permit Type: Renewal

Issued: 7/30/2008

Effective: To be entered upon final issuance

Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Title V Permit
for
Bunge North America (East) LLC

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0351010002

Facility Description: Soybean Oil Mills

Application Number(s): A0018250, A0018251, A0018252, A0018253, A0018254, A0018255

Permit Number: P0087305

Permit Description: Renewal Application

Permit Type: Renewal

Issue Date: 7/30/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Bunge North America (East) LLC
751 EAST FARMING STREET
MARION, OH 43302

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b) 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c) The permittee shall submit required reports in the following manner:
 - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.



These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(*Authority for term: OAC rule 3745-77-07(A)(3)(c)*)

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.



If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))



6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or



(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate



statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.



d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the



Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the



permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio



EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) 3.
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.
 - a) P043 - Milling/Escher Wyss central vacuum cleaning system; and
 - b) P048 - north elevator central vacuum cleaning system.
3. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
 - a) T001 - 10,000 gallon hexane underground storage tank;
 - b) T002 - 20,000 gallon hexane underground storage tank;
 - c) Z001 - coal receiving;
 - d) Z002 - ash loadout
 - e) Z003 - bulk kaolin receiving; and
 - f) Z008 - screenings bin loadout.
4. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P019, P903 and P905 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR, Part 64)
5. This facility is subject to 40 CFR Part 63, Subparts GGGG, National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart GGGG. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of section 63.2870 of 40 CFR Part 63, Subpart GGGG. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart GGGG, and Subpart A.

(Authority for term: 40 CFR, Part 63, Subpart GGGG)



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. B003, 0351010002B003

Operations, Property and/or Equipment Description:

KEELER BOILER

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17131, issued 2/1/07)	4.61 lbs nitrogen oxides (NOx)/hr and 20.19 tons NOx/yr 3.87 lbs carbon dioxide (CO)/hr and 16.95 tons CO/yr 0.35 lb particulate emissions (PE)/hr and 1.53 tons PE/yr [See b)(2)a.] 0.25 lb volatile organic compounds (VOC)/hr and 1.10 tons VOC/yr 0.03 lb sulfur dioxide (SO2)/hr and 0.13 tons SO2/yr Visible PE shall not exceed 10% opacity, as a 6-minute average. See b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-10(B)	See b)(2)c.
d.	OAC rule 3745-18-06	See b)(2)d.
e.	40 CFR, Part 60, Subpart Dc	See b)(2)e.
f.	40 CFR 63.52(a)(2)	See b)(2)f.

(a) Additional Terms and Conditions

a. All PE is assumed to be particulate matter less than 10 microns in size (PM10).



- b. The "Best Available Technology" (BAT) control requirements for this emissions unit have been determined to be the use of natural gas, compliance with the terms and conditions of this permit and includes compliance with 40 CFR Part 60, Subpart Dc.
- c. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).
- e. This regulation does not specify emission limitations for units that only fire natural gas.
- f. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

- g. The hourly emissions limitations outlined are based upon the emissions unit's potential to emit (PTE). Therefore, no monitoring, record keeping, or reporting is required to demonstrate compliance with these limitations.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17131]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the quantity of natural gas burned in this emissions unit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 60, Subpart Dc and PTI #03-17131]

- (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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- (2) This emissions unit is subject to the applicable provisions of Subpart Dc 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 60, Subpart Dc and PTI #03-17131]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 4.61 lbs NO_x/hr and 20.19 tons NO_x/yr

Applicable Compliance Method: Compliance with the hourly emission limitation shall be determined by multiplying the emission factor (AP-42, Section 1.4, Table 1.4-1.) of 100 lb NO_x/106 scf by a conversion factor of 1 scf/1020 Btu, and by the maximum heat input of 47 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- b. Emission Limitation: 3.87 lbs CO/hr and 16.95 tons CO/yr

Applicable Compliance Method: Compliance with the hourly emission limitation shall be determined by multiplying the emission factor (from AP-42, Section 1.4, Table 1.4-1.) of 84 lb CO/106 scf by the a conversion factor of 1 scf/1020 Btu, and by the maximum heat input of 47 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 10 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- c. Emission Limitation: 0.35 lb PE/hr and 1.53 tons PE/yr

Applicable Compliance Method: Compliance with the hourly emission limitation shall be determined by multiplying the emission factor (from AP-42, Section 1.4, Table 1.4-2.) of 7.6 lb PE/106 scf by a conversion factor of 1 scf/1020 Btu, and by the maximum heat input of 47 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.



[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- d. Emission Limitation: 0.25 lb VOC/hr and 1.10 tons VOC/yr

Applicable Compliance Method: Compliance with the hourly emission limitation shall be determined by multiplying the emission factor (from AP-42, Section 1.4, Table 1.4-2.) of 5.5 lb VOC/106 scf by a conversion factor of 1 scf/1020 Btu, and by the maximum heat input of 47 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- e. Emission Limitation: 0.03 lb SO₂/hr and 0.13 tons SO₂/yr

Applicable Compliance Method: Compliance with the hourly emission limitation shall be determined by multiplying the emission factor (from AP-42, Section 1.4, Table 1.4-2.) of 0.6 lb PE/106 scf by a conversion factor of 1 scf/1020 Btu, and by the maximum heat input of 47 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 6 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- f. Emission Limitation: Visible PE shall not exceed 10% opacity as a 6-minute average

Applicable Compliance Method: If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- g) Miscellaneous Requirements

- (1) None.



2. B004, 0351010002B004

Operations, Property and/or Equipment Description:

FLUIDIZED BED BOILER

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-10(C)	0.37 pound particulate emissions (PE)/mmBtu of actual heat input (when combusting coal)
c.	OAC rule 3745-17-10(C)	0.020 pound PE/mmBtu of actual heat input (when combusting only natural gas)
d.	OAC rule 3745-18-57(A)	6.1 pounds sulfur dioxide (SO ₂)/mmBtu of actual heat input
e.	OAC rule 3745-31-05 (PTI #03-779, issued 8/9/79)	See b)(2)b.
f.	40 CFR 63.52(a)(2)	See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee shall employ a baghouse to control all the PE from this emissions unit.

b. No emission limitations were established pursuant to this rule.

c. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock



for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) The quality of coal burned in this emissions unit shall meet, on an as-received basis, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 6.1 lbs/mmBtu of actual heat input.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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



[OAC rule 3745-77-07(C)(1)]

- (2) 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 ash content (percent), 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 Iso-peribol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received, the permittee's or coal supplier's analyses for ash content, sulfur content, and heat content, and the calculated SO₂ emission rate, in lbs/mmBtu of actual heat input. Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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



[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section d)(2) above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) 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 6 months after permit issuance and every 2.5 years thereafter. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass PE rate for coal (0.37 lb PE/mmBtu actual heat input).
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.



[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation: 0.37 pound PE/mmBtu of actual heat input (when combusting coal)

Applicable Compliance Method: The permittee shall demonstrate compliance with the PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitation: 0.020 pound PE/mmBtu of actual heat input (when combusting natural gas)

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitation: 6.1 pounds SO₂/mmBtu of actual heat input

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated based up the record keeping requirements in section A.III and the method outlined in OAC rule OAC rule 3745-18-04(D)(3)(c).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



3. B005, 0351010002B005

Operations, Property and/or Equipment Description:

CLAYTON STEAM GENERATOR

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-10(B)	Particulate matter emissions shall not exceed 0.020 pound per million Btu of actual heat input
c.	OAC rule 3745-18-06(A)	See b)(2)b.
d.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 8.76 tons per year</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 5.0 pounds per hour and 21.90 tons per year</p> <p>Carbon monoxide (CO) emissions shall not exceed 8.24 pounds per hour and 36.07 tons per year</p> <p>Organic compounds (OC) emissions shall not exceed 1.08 pounds per hour and 4.72 tons per year</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 0.06 pound per hour and 0.26 ton per year</p> <p>Visible PE shall not exceed 5% opacity, as a 6-minute average.</p> <p>See b)(2)c.</p>
e.	40 CFR, Part 60, Subpart Dc	See b)(2)d.
f.	40 CFR 63.52(a)(2)	See b)(2)e.



(2) Additional Terms and Conditions

- a. The visible particulate emission limitations specified by this rule are less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. Units are exempt from this rule when natural gas is the only fuel burned.
- c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B) and 3745-18-06.
- d. This regulation does not specify emission limitations for units that only fire natural gas.
- e. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain, at the location of the unit, documentation showing the maximum rated heat input capacity of the unit and the evidence that the unit can only fire natural gas.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 60, Subpart Dc]

- (2) The permittee shall maintain monthly records of the total amount of natural gas fired for the unit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 60, Subpart Dc]

- (3) 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.

[OAC rule 3745-77-07(C)(1)]



e) Reporting Requirements

(1) For units installed after the effective date of this rule, the owner or operator electing to use this permit-by-rule shall report the following, in accordance with 40 CFR, Part 60, Subpart Dc, to the appropriate Ohio EPA district office or local air agency at the appropriate times:

- a. Construction date (no later than thirty days after such date).
- b. Anticipated start-up date (not more than sixty days or less than thirty days prior to such date).
- c. Actual start-up date (within fifteen days after such date).
- d. Date of performance testing (if required, at least thirty days prior to testing).
- e. The maximum rated heat input capacity of the unit and the type of fuel fired (no later than thirty days after installation date).

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 60, Subpart Dc]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation: Particulate matter emissions shall not exceed 0.020 pound per million Btu of actual heat input

Applicable Compliance Method: Compliance with the pound per million Btu particulate emission limitation is based on dividing the filterable particulate emission factor specified by the U.S. EPA in Section 1.4 of the "Compilation of Air Pollutant Emission Factors (AP-42)" by 1020.

If required by the Ohio EPA, the permittee shall demonstrate compliance with the pound per million Btu emission limitation of this permit-by-rule in accordance with the appropriate test methods specified in Appendix A, 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 8.76 tons PE/yr

Applicable Compliance Method: Compliance with the annual emission limitation shall be assumed as long as compliance with the pound per million Btu emission limitation is maintained. The annual emission limitation represents the emissions calculated at the maximum capacity of the equipment and 8760 hours per year operation.



[OAC rule 3745-77-07(C)(1)]

- c. Emission Limitation: 5.0 lbs NO_x/hr and 21.90 tons NO_x/yr

Applicable Compliance Method: Compliance with the hourly emission limitation is based on multiplying the maximum hourly gas firing capacity of the unit (in million cubic feet per hour) by the emission factor specified in Section 1.4 of the "Compilation of Air Pollutant Emission Factors (AP-42)" (in pound per million cubic feet).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained. The annual emission limitation represents the emissions calculated at the maximum capacity of the equipment and 8760 hours per year operation.

[OAC rule 3745-77-07(C)(1)]

- d. Emission Limitation: 8.24 lbs CO/hr and 36.07 tons CO/yr

Applicable Compliance Method: Compliance with the hourly emission limitation is based on multiplying the maximum hourly gas firing capacity of the unit (in million cubic feet per hour) by the emission factor specified in Section 1.4 of the "Compilation of Air Pollutant Emission Factors (AP-42)" (in pound per million cubic feet).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained. The annual emission limitation represents the emissions calculated at the maximum capacity of the equipment and 8760 hours per year operation.

[OAC rule 3745-77-07(C)(1)]

- e. Emission Limitation: 1.08 lbs OC/hr and 4.72 tons OC/yr

Applicable Compliance Method: Compliance with the hourly emission limitation is based on multiplying the maximum hourly gas firing capacity of the unit (in million cubic feet per hour) by the emission factor specified in Section 1.4 of the "Compilation of Air Pollutant Emission Factors (AP-42)" (in pound per million cubic feet).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained. The annual emission limitation represents the emissions calculated at the maximum capacity of the equipment and 8760 hours per year operation.

[OAC rule 3745-77-07(C)(1)]

- f. Emission Limitation: 0.06 lb SO₂/hr and 0.26 ton SO₂/yr

Applicable Compliance Method: Compliance with the hourly emission limitation is based on multiplying the maximum hourly gas firing capacity of the unit (in million cubic feet per hour) by the emission factor specified in Section 1.4 of the



"Compilation of Air Pollutant Emission Factors (AP-42)" (in pound per million cubic feet).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained. The annual emission limitation represents the emissions calculated at the maximum capacity of the equipment and 8760 hours per year operation.

[OAC rule 3745-77-07(C)(1)]

- g. Emission Limitation: Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method: If required by the Ohio EPA, compliance with the visible particulate emissions limitation shall be demonstrated in accordance with Method 9 of Appendix A, 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1)]

- g) Miscellaneous Requirements

- (1) None.



4. F002, 0351010002F002

Operations, Property and/or Equipment Description:

GRAIN DRYER SYSTEM

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.
c.	OAC rule 3745-31-05 (PTI #03-5261, issued 10/5/00)	4.94 lbs fugitive particulate emissions (PE)/hour and 12.40 tons fugitive PE/yr 4.84 lbs nitrogen oxides (NOx)/hour and 12.20 tons NOx/yr See b)(2)c. and B)(2)d.
d.	40 CFR, Part 60, Subpart DD	See b)(2)e.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. The 4.18 pounds fugitive PE/hour and 2.88 lbs NOx/hr emission limitations were established for PTI purposes to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

d. The "Best Available Technology" (BAT) control requirements for this emissions unit have been determined to be the use of column plate perforations not exceed 0.078 inch in diameter, compliance with the terms and conditions of this permit and includes compliance with 40 CFR Part 60, Subpart Dc.



- e. The emission limitation established by this rule is either equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

- c) Operational Restrictions
 - (1) The permittee shall not operate this emissions unit more than 5040 hours per rolling 12-month period.
[OAC rule 3745-77-07(A)(1) and PTI #03-5261]
 - (2) The permittee shall not dry more than 90 tons per hour in this emission unit.
[OAC rule 3745-77-07(A)(1) and PTI #03-5261]

- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain daily records of the operation of this emissions unit. These records shall contain the following:
 - a. the total hours the emission unit was in operation;
 - b. the total material throughput, in tons/day; and
 - c. the average hourly production rate (a divided by b).[OAC rule 3745-77-07(C)(1) and PTI #03-5261]
 - (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month numbers of the operating hours.[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

- e) Reporting Requirements
 - (1) The company shall submit semi-annual reports to the NWDO, Division of Air Pollution Control, summarizing the information for terms and conditions d)(1) and d)(2).
[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

- f) Testing Requirements
 - (1) Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: 4.94 lbs fugitive PE/hr and 12.40 tons fugitive PE/yr
Applicable Compliance Method: Compliance may be determined as follows:



- i. multiply the maximum hourly throughput (tons/hour) by the emission factor from AP-42, Table 9.9.1-1 (revised 5/98) of 0.22 pound PE/ton by a control factor of $(1-.9)^*$;
- ii. multiply the maximum hourly natural gas combustion rate (mm cu. ft./hour) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 pounds PE (filterable)/mm cu. ft.; and
- iii. sum i + ii.

*The control efficiency of the perforations is assumed to be 90%.

The annual limitation was developed by multiplying the lbs/hr limitation by the maximum annual operating schedule of 5040 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

- b. Emission Limitation: 4.84 lbs NO_x/hr and 12.20 tons NO_x/yr

Applicable Compliance Method: Compliance may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hour) by the emission factor from AP-42, Table 1.4-1 (revised 3/98) of 100 pounds NO_x/mm cu. ft.

If required, compliance shall be determined pursuant to Methods 1-5 and 7, 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr limitation by the maximum annual operating schedule of 5040 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

- g) Miscellaneous Requirements

- (1) None.



5. F003, 0351010002F003

Operations, Property and/or Equipment Description:

GRAIN RAIL / TRUCK LOADOUT

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emission limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

(2)



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



6. F004, 0351010002F004

Operations, Property and/or Equipment Description:

GRAIN STORAGE PILE

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3) (PTI #03-13342, issued 7/20/06)	<p>0.66 ton fugitive particulate emissions (PE)/year from grain (corn) receiving, load-in and load-out of the grain (corn) storage pile and wind erosion from the grain (corn) storage pile</p> <p>no visible emissions except for one minute during any one-hour observation period from grain (corn) receiving, load-in and load-out of the grain (corn) storage pile</p> <p>no visible emissions except for one minute during any one-hour observation period from wind erosion from the grain (corn) storage pile</p> <p>utilization of best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from grain (corn) receiving, load-in and load-out of the grain (corn) storage pile [See Sections b)(2)c., b)(2)d. and b)(2)g.]</p> <p>utilization of best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from wind erosion from the grain</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(corn) storage pile [See Sections b)(2)e. through b)(2)g.]

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- c. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the use of "choked flow" while unloading to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The above-mentioned control measure(s) shall be employed for the load-in and load-out operations of the storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- e. The permittee shall employ best available control measures for wind erosion from the surface of the storage pile for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintaining a low storage pile height to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The above-mentioned control measure(s) shall be employed for wind erosion from the storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary if the storage pile is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.



c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 100,800 tons of grain.

[OAC rule 3745-77-07(A)(1) and PTI #03-13342]

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the load-in operation at the storage pile on a weekly basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of the load-out operation at the storage pile on a weekly basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from the storage pile surface on a weekly basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (4) No inspection shall be necessary for wind erosion from the surface of the storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of the storage pile, and wind erosion from the surface of the storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (6) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (7) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the quantity, in tons, of grain (corn) received and stored; and,



- b. the total year-to-date quantity, in tons, of grain (corn) received and stored [the sum of "a" for each month].

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

(8) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and,
- d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(8)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

e) Reporting Requirements

(1) The permittee shall submit deviation reports that identify any of the following occurrences:

- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

(2) The permittee shall submit annual reports that summarize the annual throughput for this emission unit. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]



f) Testing Requirements

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

a. Emission Limitation: 0.66 ton fugitive PE/year

Applicable Compliance Method: The permittee shall calculate the annual emission rate by multiplying the tons grain/year [from d)(7)b.] by an emission factor of 0.013 pound PE/ton (as there is no emission factor for this type of operation, the emission factor from AP-42 Table 13.2.4 (revised 1/95) for aggregate storage piles was assumed to be a worst-case scenario).

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

b. Emission Limitation: no visible emissions except for one minute during any one-hour observation period

Applicable Compliance Method: Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

g) Miscellaneous Requirements

(1) None.



7. F005, 0351010002P902

Operations, Property and/or Equipment Description:

ELEVATOR RAIL RECEIVING

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17131, issued 2/1/07)	18.92 tons fugitive particulate emissions (PE)/yr 4.61 tons fugitive particulate matter less than 10 microns in size (PM10)/yr See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.
d.	40 CFR, Part 60, Subpart DD	See b)(2)d.

(2) Additional Terms and Conditions

a. Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of an enclosure, compliance with the terms and conditions of this permit and includes compliance with 40 CFR Part 60, Subpart DD.

b. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

d. The permittee shall not cause to be discharged into the atmosphere any fugitive emission from:



- i. Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]



f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 18.92 tons fugitive PE/yr

Applicable Compliance Method: The tons of fugitive PE/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.032 lb PE/ton, the maximum hourly throughput rate of 450 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

b. Emission Limitation: 4.61 tons fugitive PM10/yr

Applicable Compliance Method: The tons of fugitive PM10/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.0078 lb PM10/ton, the maximum hourly throughput rate of 450 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

c. Emission Limitation: The permittee shall not cause to be discharged into the atmosphere any fugitive emission from any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

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

g) Miscellaneous Requirements

(1) None.



8. P006, 0351010002P006

Operations, Property and/or Equipment Description:

PELLETING

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	66.8 pounds particulate emissions (PE)/hour

(2) Additional Terms and Conditions

a. The permittee shall employ a multiple-cyclone to control all the PE from this emissions unit.

c) Operational Restrictions

(1) None.

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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



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

[OAC rule 3745-77-07(C)(1)]

e) 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(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 66.8 pounds PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the outlet grain loading (per stack test data) of 0.0062 grain/cu. ft by the total maximum volumetric air flow rate through the multiple-cyclone (cu ft./minute) and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with the PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



9. P012, 0351010002P012

Operations, Property and/or Equipment Description:

BEAN WEIGHING AND CLEANING

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17131, issued 2/1/07)	0.0025 grains (gr) particulate emissions (PE)/dry standard cubic foot (dscf) and 0.48 tons PE/yr [See b)(2)a.] See b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	40 CFR, Part 60, Subpart DD	See b)(2)e. and b)(2)f.

(2) Additional Terms and Conditions

- a. All PE is assumed to be particulate matter less than 10 microns in size (PM10).
- b. The "Best Available Technology" (BAT) control requirements for this emissions unit have been determined to be the use of baghouse with a maximum outlet concentration of 0.0025 gr PE/dscf and compliance with the terms and conditions of this permit.
- c. These emissions units are exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Marion County.
- e. The permittee shall not cause to be discharged into the atmosphere from any affected facility, any process emission which:



- i. exhibits greater than 0 percent opacity.
- f. The outlet concentration limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- (2) This emissions unit is subject to the applicable provisions of Subpart DD 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. actual start-up date (within 15 days after such date); and,
- c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency

DAPC - Permit Management Unit

P. O. Box 163669

Columbus, Ohio 43216-3669

and



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

Ohio Environmental Protection Agency

Northwest District Office

Division of Air Pollution Control

347 North Dunbridge Road

Bowling Green, Ohio 43402

[OAC rule 374577-07(C)(1) and PTI #03-17131]

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations: 0.0025 gr PE/dscf and 0.48 tons PE/yr

Applicable Compliance Method: The 0.0025 gr/dscf limitation is the established BAT maximum outlet concentration. Compliance with the tons PE/yr limitation shall be determined by multiplying the maximum outlet concentration of 0.0025 gr/dscf by the maximum volumetric air flow (5000 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr, 8760 hours/year and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

b. Emission Limitation: The permittee shall not cause to be discharged into the atmosphere from any affected facility, any process emission which exhibits greater than 0 percent opacity.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

g) Miscellaneous Requirements

(1) None.



10. P015, 0351010002P015

Operations, Property and/or Equipment Description:

HULL REFINING / GRINDING/ STORAGE

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-31-05 (PTI #03-13094, issued 2/18/99)	baghouse #1 (hull storage bins): 0.99 lb PE/hr and 0.39 ton PE/yr baghouse #2 (screens and grinders): 0.93 lb PE/hr and 4.07 tons PE/yr See b)(2)b.

(2) Additional Terms and Conditions

a. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

b. The permittee shall employ two baghouses to control particulate emissions from emission unit P015.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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



monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouses on weekly basis.

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

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

The acceptable range for the pressure drop across the baghouses is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13094]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouses field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13094]

f) Testing Requirements

- (1) 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 twelve months after the issuance of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass PE rate.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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, Northwest 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest 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, Northwest District Office.

(2) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13094]

b. Emission Limitations: baghouse #1 (hull storage bins): 0.09 pound PE/hour and 0.39 ton PE/year

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The permittee may also determine compliance by multiplying the manufacturer-guaranteed outlet grain loading (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (2,000 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13094]

c. Emission Limitations: baghouse #2 (screens & grinders): 0.93 pound PE/hour and 4.07 tons PE/year

Applicable Compliance Method: The permittee shall demonstrate compliance with the PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The permittee may also demonstrate compliance by multiplying the manufacturer-guaranteed outlet grain loading (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (21,600 cu. ft/minute) and by 60, and then dividing by 7000.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13094]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



11. P019, 0351010002P019

Operations, Property and/or Equipment Description:

MEAL GRINDING

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	23.6 lbs PE/hour
c.	40 CFR, Part 64	See d) and e)

(2) Additional Terms and Conditions

a. The permittee shall employ a baghouse to control all of the PE from this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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



investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations, and visible emissions checks. When the static pressure drop or visible emissions show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (3) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion



or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (5) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
 - a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

f) Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 23.6 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed maximum outlet concentration (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (5,000 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



12. P025, 0351010002P025

Operations, Property and/or Equipment Description:

NORTH STORAGE ASPIRATION

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	See b)(2)b.
b.	OAC rule 3745-17-11(B)	73.0 lbs particulate emissions (PE)/hour
c.	40 CFR, Part 60, Subpart DD	See b)(2)c.
d.	USEPA Consent Decree	0.01 grain (gr) PE/dry standard cubic foot (dscf)

(2) Additional Terms and Conditions

a. The permittee shall employ a baghouse to control all of the PE from this emissions unit.

b. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 60, Subpart DD.

c. The permittee shall not cause to be discharged into the atmosphere any fugitive emission from:

i. any grain handling operation which exhibits greater than 10 percent opacity.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating



manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and



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

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 73.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed maximum outlet concentration (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (22,500 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: The permittee shall not cause to be discharged into the atmosphere any fugitive emissions from: any grain handling operation which exhibits greater than 10 percent opacity.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- c. Emission Limitation: 0.01 gr PE/dscf

Applicable Compliance Method: The company had a testing requirement in the USEPA Consent Decree to demonstrate compliance (to be completed by June 30, 2006) with this limitation. The permittee has completed the required testing and shown compliance.

If required, the permittee shall demonstrate compliance with the outlet concentration in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and USEPA Consent Decree]

g) Miscellaneous Requirements

- (1) None.



13. P027, 0351010002P027

Operations, Property and/or Equipment Description:

SOUTH STORAGE ASPIRATION

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	75.0 lbs PE/hour

(2) Additional Terms and Conditions

a. The permittee shall employ a baghouse to control all the PE from this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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



investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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



[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation: 75.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed outlet grain loading (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (23,720 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



14. P036, 0351010002P036

Operations, Property and/or Equipment Description:

FLAKING ROLL SYSTEM

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-31-05 (PTI #03-7676, issued 10/5/00)	0.79 lb PE/hr and 3.46 tons PE/yr

(2) Additional Terms and Conditions

a. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

b. The permittee shall employ a baghouse to control all of the PE from this emissions unit and emissions unit P012.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.



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

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]



(1) Reporting Requirements

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

- a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1)]

(4) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

e) Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-7676]

- b. Emission Limitation: 0.79 lb PE/hr and 3.46 tons PE/yr

Applicable Compliance Method: The permittee may determine compliance by multiplying the manufacturer-guaranteed outlet grain loading (0.005 grain/cu. ft)



by the total maximum volumetric air flow rate (18,500 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, the permittee shall demonstrate compliance with the hourly PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-7676]

f) Miscellaneous Requirements

- (1) None.



15. P039, 0351010002P039

Operations, Property and/or Equipment Description:

SOYBEAN EXTRACTOR

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(G)	none [See c)(1)]
b.	OAC rule 3745-31-05 (PTI #03-08866, issued 11/2/06)	0.24 gallon organic compounds (OC)/ton of crushed soybeans based on a 365-day rolling average 65.32 tons OC per rolling, 30 day period 392 tons OC per rolling, 12 month period See b)(2)a. and b)(2)b.
c.	40 CFR, Part 63, Subpart GGGG (40 CFR 63.2830 – 40 CFR 63.2872)	See Table 1 (ix) of 63.2840: solvent loss factor – 0.2 gal/ton See b)(2)c., c)(2), d)(5) and e)(5)
d.	USEPA Consent Order	0.20 gallons of volatile organic compounds (VOC)/ton of oilseed processed

(2) Additional Terms and Conditions

a. VOC emissions from the hexane extraction operation emanate from Ohio EPA Source Numbers P039, P040 and P046. It is impractical to attempt to determine emission rates on a source-by-source basis. The VOC emission rates of this permit represent the allowable emissions from all three sources.

b. Hexane consumption/emission rates from the hexane extraction operation shall be determined on a "mass balance" basis. Consumption/emission rates shall not exceed the following levels:



- c. Hexane consumption in sources P039, P040 and P046 shall not exceed 140,000 gallons (392 tons) per rolling 12-month period;
- d. The emissions of hexane from sources P039, P040 and P046 shall not exceed 0.24 gallons per tons of crushed soybeans (0.000671 pounds of hexane per pound of crushed soybean), based on a 365-day rolling weighted average; and
- e. The short-term loss of hexane from sources P039, P040 and P046 shall not exceed 65.32 tons in any rolling 30 day period.
- f. The permittee shall comply with the applicable emission and compliance requirements required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2840(a), (b), (c), (d), (e) and (f)	emission requirements
63.2850(a), (b), (c), (d) and (e)	compliance with HAP emission standards

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-08866]

- (2) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2851(a) and (b)	plan for demonstrating compliance
63.2852	startup, shutdown and malfunction plan

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart GGGG]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following information each month for this emissions unit:
 - a. the company identification of each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (2) The permittee shall collect and record the following information on a monthly basis for this emissions units:



- a. the total amount of hexane input* to the process (purchased), in pounds and gallons;
- b. the rolling, 12-month total hexane consumption, in gallons;
- c. all incidents of startup or shutdown of the emissions unit, including all amounts of hexane that are routinely added to the system or returned to the storage tanks due to startup or shutdown. This amount of hexane is process hexane that is present in the system during times of continuous operation, but will drain out of the system during shutdown and needs to be charged back into the system prior to startup. The amount of hexane used to "recharge" the system should not be interpreted as a "hexane loss" in calculating emission rates;
- d. dates of scheduled cleaning/maintenance; and
- e. dates of any process upsets.

*Note: it is assumed that all of the hexane input into the process is emitted via point sources (mineral oil absorber and DTDC) and fugitive sources.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (3) The permittee shall collect and record the following information on a daily basis for this emissions unit:
 - a. the total amount of hexane input* to the process (purchased), in pounds and gallons;
 - b. the total quantity of soybeans weighed in the preparation process before the hexane extraction operation, in pounds and tons;
 - c. the weighted-average hexane loss rate, in gallons of hexane/ton of crushed soybeans, and in pounds hexane/pound crushed soybeans [a/b];
 - d. the rolling, 365-day weighted average hexane loss rate, in gallons of hexane/ton of crushed soybeans, and in pounds hexane/pound crushed soybeans [the sum of c for any 365-day period];
 - e. the amount of hexane emitted, in tons; and
 - f. the amount of hexane emitted, in tons/rolling, 30-day period.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (4) To demonstrate compliance with the final VOC solvent loss ratio (SLR) [0.20 gal/ton] limit, the permittee shall:
 - a. maintain the records required by 40 CFR, Part 63, Subpart GGGG on solvent loss and quantity of oilseed processed; and
 - b. maintain the records as required by 40 CFR, Part 63, Subpart GGGG, for any malfunction period as defined in Section 7.0 of the Consent Decree.



[OAC rule 3745-77-07(C)(1) and U.S. EPA Consent Decree]

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2853(a), (b) and (c)	determination of actual solvent loss
63.2854(a) and (b)	determination of the weighted average volume fraction of HAP in the actual solvent loss
63.2855(a), (b) and (c)	determination of the quantity of oilseed processed
63.2862(a), (b), (c), (d) and (e)	records requirements
63.2863(a), (b) and (c)	form and length of retention of records

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (2) The permittee shall submit quarterly deviation (excursion) reports for the following for this emissions unit:
- a. any monthly record that shows an exceedance of the limitation of 140,000 gallons (392 tons) hexane/rolling 12-month period;
 - b. any daily record that shows an exceedance of the limitation of 0.24 gallon hexane/ton of crushed soybeans (0.000671 pound of hexane/pound of crushed soybeans) based on a 365-day-day rolling, weighted average; and
 - c. any daily record that shows an exceedance of the limitation of 65.32 tons/rolling, 30-day period.

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (3) The permittee shall submit annual reports of the following information:
- a. the total hexane usage, in gallons; and



- b. the total hexane emissions, in tons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (4) In the semiannual reports due six months after the Interim Limit Start Date (as the term is defined in the Consent Decree), and every six months thereafter, as required by Paragraph 47 of the Consent Decree, or in a separate report if the permittee requests and EPA approves an extension, the permittee shall submit reports to EPA and the appropriate State agency identifying the plants at which VOC reduction projects have been installed since the last reporting period and the permittee's tentative projections for the remaining installations, to demonstrate that the deadlines in each plant-specific CTP have been and will be met. If the permittee undertakes any project for the primary purpose of reducing VOC emissions from the plant that is not described in this or any plant-specific CTP, the permittee shall include these projects in the semiannual report for that period.

[OAC rule 3745-77-07(C)(1) and U.S. EPA Consent Decree]

- (5) The permittee shall submit reports and notifications to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2860(d)	notification of compliance status
63.2861(a), (b), (c) and (d)	reporting requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitations: 65.32 tons OC/rolling, 30-day period and 392.0 tons/rolling, 12-month period

Applicable Compliance Method: The permittee shall demonstrate compliance with the monthly and annual OC emission limitations through the record keeping required in section d)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- b. Emission Limitation: 0.24 gallon hexane/ton crushed soybeans, based on a 365-day rolling, weighted average

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC limitation through the record keeping required in section d)(3) of the terms and conditions of this permit.



[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- c. Emission Limitation: 0.20 gallons of VOC/ton of oilseed processed

Applicable Compliance Method: Compliance with the VOC solvent loss ratio (SLR) limits in the Consent Decree shall be determined in accordance with 40 CFR, Part 63, Subpart GGGG using the following equation. The permittee shall comply with the interim and final VOC SLR limits pursuant to Section IV of the Consent Decree.

Plant Compliance Ratio = Plant Actual Solvent Loss (gal) / Allowable Solvent Loss (gal)

Where:

Plant Actual Solvent Loss = Gallons of solvent loss during previous 12 operating months at plant "i"

Allowable Solvent Loss Oilseed "i" = Tons of each oilseed processed at plant "i" during the previous 12 operating months

SLR "i" = Interim or Final SLR, as defined in the CTP, for plant "i"

The permittee is in compliance with the SLR limit if the Plant Compliance Ratio is less than or equal to one. Compliance with the interim and final VOC SLR limits for the soybean extraction plants shall be determined in accordance with 40 CFR, Part 63, Subpart GGGG, with the following exceptions: (1) provisions pertaining to HAP content shall not apply; (2) monitoring and recordkeeping of solvent losses at each plant shall be conducted daily; (3) solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses; and (4) records shall be kept in a similar format as the table in Section 7.3, that show total solvent losses, solvent losses during malfunction periods, and adjusted solvent losses (i.e., total solvent losses minus malfunction losses) monthly and on a 12-month rolling basis.

[OAC rule 3745-77-07(C)(1) and USEPA Consent Decree]

- d. Emission Limitation: solvent loss factor – 0.2 gal/ton

Applicable Compliance Method: Compliance shall be based on the requirements specified in section b)(2)c. of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

- g) Miscellaneous Requirements

- (1) None.



16. P040, 0351010002P040

Operations, Property and/or Equipment Description:

SOYBEAN MEAL DESOLVENTIZING/TOASTING/DRYING/COOLING

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05.
c.	OAC rule 3745-21-07	none [See c)(1)]
d.	OAC rule 3745-31-05 (PTI #03-08866, issued 11/2/06)	0.24 gallon organic compounds (OC)/ton of crushed soybeans based on a 365-day rolling average 65.32 tons OC per rolling, 30 day period 392 tons OC per rolling, 12 month period 2.72 lbs PE/hr 2.72 lbs particulate matter less than 10 microns in size (PM10)/hr See b)(2)a. and b)(2)b.
e.	40 CFR, Part 63, Subpart GGGG (40 CFR 63.2830 – 40 CFR 63.2872)	See Table 1 (ix) of 63.2840: solvent loss factor – 0.2 gal/ton See b)(2)d., c)(2), d)(6) and e)(6)
f.	USEPA Consent Order	0.20 gallons of volatile organic compounds (VOC)/ton of oilseed processed



(2) Additional Terms and Conditions

- a. VOC emissions from the hexane extraction operation emanate from Ohio EPA Source Numbers P039, P040 and P046. It is impractical to attempt to determine emission rates on a source-by-source basis. The VOC emission rates of this permit represent the allowable emissions from all three sources.
- b. Hexane consumption/emission rates from the hexane extraction operation shall be determined on a "mass balance" basis. Consumption/emission rates shall not exceed the following levels:
 - i. Hexane consumption in sources P039, P040 and P046 shall not exceed 140,000 gallons (392 tons) per rolling 12-month period;
 - ii. The emissions of hexane from sources P039, P040 and P046 shall not exceed 0.24 gallons per tons of crushed soybeans (0.000671 pounds of hexane per pound of crushed soybean), based on a 365-day rolling weighted average; and
 - iii. The short-term loss of hexane from sources P039, P040 and P046 shall not exceed 65.32 tons in any rolling 30 day period.
- c. The permittee shall employ a cyclone to control all the PE from the desolventizer toaster, dryer and cooler (DTDC) portions of this process.
- d. The permittee shall comply with the applicable emission and compliance requirements required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2840(a), (b), (c), (d), (e) and (f)	emission requirements
63.2850(a), (b), (c), (d) and (e)	compliance with HAP emission standards

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-08866]

- (2) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2851(a) and (b)	plan for demonstrating compliance
63.2852	startup, shutdown and malfunction plan



[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart GGGG]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following information each month for this emissions unit:
- a. the company identification of each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (2) The permittee shall collect and record the following information on a monthly basis for this emissions units:
- a. the total amount of hexane input* to the process (purchased), in pounds and gallons;
 - b. the rolling, 12-month total hexane consumption, in gallons;
 - c. all incidents of startup or shutdown of the emissions unit, including all amounts of hexane that are routinely added to the system or returned to the storage tanks due to startup or shutdown. This amount of hexane is process hexane that is present in the system during times of continuous operation, but will drain out of the system during shutdown and needs to be charged back into the system prior to startup. The amount of hexane used to "recharge" the system should not be interpreted as a "hexane loss" in calculating emission rates.;
 - d. dates of scheduled cleaning/maintenance; and
 - e. dates of any process upsets.

*Note: it is assumed that all of the hexane input into the process is emitted via point sources (mineral oil absorber and DTDC) and fugitive sources.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (3) The permittee shall collect and record the following information on a daily basis for this emissions unit:
- a. the total amount of hexane input* to the process (purchased), in pounds and gallons;
 - b. the total quantity of soybeans weighed in the preparation process before the hexane extraction operation, in pounds and tons;
 - c. the weighted-average hexane loss rate, in gallons of hexane/ton of crushed soybeans, and in pounds hexane/pound crushed soybeans [a/b];



- d. the rolling, 365-day weighted average hexane loss rate, in gallons of hexane/ton of crushed soybeans, and in pounds hexane/pound crushed soybeans [the sum of c for any 365-day period];
- e. the amount of hexane emitted, in tons; and
- f. the amount of hexane emitted, in tons/rolling, 30-day period.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (4) To demonstrate compliance with the final VOC solvent loss ratio (SLR) [0.20 gal/ton] limit, the permittee shall:
 - a. maintain the records required by 40 CFR, Part 63, Subpart GGGG on solvent loss and quantity of oilseed processed; and
 - b. maintain the records as required by 40 CFR, Part 63, Subpart GGGG, for any malfunction period as defined in Section 7.0 of the Consent Decree.

[OAC rule 3745-77-07(C)(1) and U.S. EPA Consent Decree]

- (5) 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 cyclone serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2853(a), (b) and (c)	determination of actual solvent loss
63.2854(a) and (b)	determination of the weighted average volume fraction of HAP in the actual solvent loss
63.2855(a), (b) and (c)	determination of the quantity of oilseed processed
63.2862(a), (b), (c), (d) and (e)	records requirements



63.2863(a), (b) and (c)	form and length of retention of records
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[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (2) The permittee shall submit quarterly deviation (excursion) reports for the following for this emissions unit:
 - a. any monthly record that shows an exceedance of the limitation of 140,000 gallons (392 tons) hexane/rolling 12-month period;
 - b. any daily record that shows an exceedance of the limitation of 0.24 gallon hexane/ton of crushed soybeans (0.000671 pound of hexane/pound of crushed soybeans) based on a 365-day-day rolling, weighted average; and
 - c. any daily record that shows an exceedance of the limitation of 65.32 tons/rolling, 30-day period.

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (3) The permittee shall submit annual reports of the following information:
 - a. the total hexane usage, in gallons; and
 - b. the total hexane emissions, in tons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (4) In the semiannual reports due six months after the Interim Limit Start Date (as the term is defined in the Consent Decree), and every six months thereafter, as required by Paragraph 47 of the Consent Decree, or in a separate report if the permittee requests and EPA approves an extension, the permittee shall submit reports to EPA and the appropriate State agency identifying the plants at which VOC reduction projects have been installed since the last reporting period and the permittee's tentative projections for the remaining installations, to demonstrate that the deadlines in each plant-specific CTP



have been and will be met. If the permittee undertakes any project for the primary purpose of reducing VOC emissions from the plant that is not described in this or any plant-specific CTP, the permittee shall include these projects in the semiannual report for that period.

[OAC rule 3745-77-07(C)(1) and U.S. EPA Consent Decree]

- (5) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the cyclone serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall submit reports and notifications to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2860(d)	notification of compliance status
63.2861(a), (b), (c) and (d)	reporting requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

f) Testing Requirements

- (1) 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 3 months after issuance of the permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE and PM10, in the appropriate averaging periods.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5 of 40 CFR Part 60, Appendix A and for PM10, Method 201 or 201A and 202 of 40 CFR Part 51, Appendix M.

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

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.



Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

b. Emission Limitations: 65.32 tons OC/rolling, 30-day period and 392.0 tons/rolling, 12-month period

Applicable Compliance Method: The permittee shall demonstrate compliance with the monthly and annual OC emission limitations through the record keeping required in section d)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

c. Emission Limitation: 0.24 gallon OC/ton crushed soybeans, based on a 365-day rolling, weighted average

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC limitation through the record keeping required in section d)(3) of the terms and conditions of this permit.



[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- d. Emission Limitation: 0.20 gallons of VOC/ton of oilseed processed

Applicable Compliance Method: Compliance with the VOC solvent loss ratio (SLR) limits in the Consent Decree shall be determined in accordance with 40 CFR, Part 63, Subpart GGGG using the following equation. The permittee shall comply with the interim and final VOC SLR limits pursuant to Section IV of the Consent Decree.

$$\text{Plant Compliance Ratio} = \text{Plant Actual Solvent Loss (gal)} / \text{Allowable Solvent Loss (gal)}$$

Where:

Plant Actual Solvent Loss = Gallons of solvent loss during previous 12 operating months at plant "i"

Allowable Solvent Loss Oilseed "i" = Tons of each oilseed processed at plant "i" during the previous 12 operating months

SLR "i" = Interim or Final SLR, as defined in the CTP, for plant "i"

The permittee is in compliance with the SLR limit if the Plant Compliance Ratio is less than or equal to one. Compliance with the interim and final VOC SLR limits for the soybean extraction plants shall be determined in accordance with 40 CFR, Part 63, Subpart GGGG, with the following exceptions: (1) provisions pertaining to HAP content shall not apply; (2) monitoring and recordkeeping of solvent losses at each plant shall be conducted daily; (3) solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses; and (4) records shall be kept in a similar format as the table in Section 7.3, that show total solvent losses, solvent losses during malfunction periods, and adjusted solvent losses (i.e., total solvent losses minus malfunction losses) monthly and on a 12-month rolling basis.

[OAC rule 3745-77-07(C)(1) and USEPA Consent Decree]

- e. Emission Limitation: 2.72 lbs PE/hr and 2.72 lbs PM10/hr

Applicable Compliance Method: The permittee shall demonstrate compliance with the PE and PM10 limitations based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A and Methods 1 - 4 and 201 or 201A and 202 of 40 CFR Part 51, Appendix M.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- f. Emission Limitation: solvent loss factor – 0.2 gal/ton

Applicable Compliance Method: Compliance shall be based on the requirements specified in section b)(2)d. of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



17. P046, 0351010002P046

Operations, Property and/or Equipment Description:

SOYBEAN MEAL COOLER

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05.
c.	OAC rule 3745-21-07	None [See c)(1)]
d.	OAC rule 3745-31-05 (PTI #03-08866, issued 11/2/06)	0.24 gallon organic compounds (OC)/ton of crushed soybeans based on a 365-day rolling average 65.32 tons OC per rolling, 30 day period 392 tons OC per rolling, 12 month period 0.01 grains (gr) PE/dry standard cubic foot (dscf) (1.5 lbs PE/hr) See b)(2)a. and b)(2)b.
e.	40 CFR, Part 63, Subpart GGGG (40 CFR 63.2830 – 40 CFR 63.2872)	See Table 1 (ix) of 63.2840: solvent loss factor – 0.2 gal/ton See b)(2)d., c)(2), d)(6) and e)(6)
f.	USEPA Consent Order	0.20 gallons of volatile organic compounds (VOC)/ton of oilseed processed



(2) Additional Terms and Conditions

- a. VOC emissions from the hexane extraction operation emanate from Ohio EPA Source Numbers P039, P040 and P046. It is impractical to attempt to determine emission rates on a source-by-source basis. The VOC emission rates of this permit represent the allowable emissions from all three sources.
 - i. Hexane consumption/emission rates from the hexane extraction operation shall be determined on a "mass balance" basis. Consumption/emission rates shall not exceed the following levels:
 - ii. Hexane consumption in sources P039, P040 and P046 shall not exceed 140,000 gallons (392 tons) per rolling 12-month period;
 - iii. The emissions of hexane from sources P039, P040 and P046 shall not exceed 0.24 gallons per tons of crushed soybeans (0.000671 pounds of hexane per pound of crushed soybean), based on a 365-day rolling weighted average; and
 - iv. The short-term loss of hexane from sources P039, P040 and P046 shall not exceed 65.32 tons in any rolling 30 day period.
- b. The permittee shall employ a cyclone to control all of the PE from this emissions unit.
- c. The permittee shall comply with the applicable emission and compliance requirements required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2840(a), (b), (c), (d), (e) and (f)	emission requirements
63.2850(a), (b), (c), (d) and (e)	compliance with HAP emission standards

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-08866]

- (2) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2851(a) and (b)	plan for demonstrating compliance
63.2852	startup, shutdown and malfunction plan



[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart GGGG]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following information each month for this emissions unit:
- a. the company identification of each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (2) The permittee shall collect and record the following information on a monthly basis for this emissions units:
- a. the total amount of hexane input* to the process (purchased), in pounds and gallons;
 - b. the rolling, 12-month total hexane consumption, in gallons;
 - c. all incidents of startup or shutdown of the emissions unit, including all amounts of hexane that are routinely added to the system or returned to the storage tanks due to startup or shutdown. This amount of hexane is process hexane that is present in the system during times of continuous operation, but will drain out of the system during shutdown and needs to be charged back into the system prior to startup. The amount of hexane used to "recharge" the system should not be interpreted as a "hexane loss" in calculating emission rates;
 - d. dates of scheduled cleaning/maintenance; and
 - e. dates of any process upsets.

*Note: it is assumed that all of the hexane input into the process is emitted via point sources (mineral oil absorber and DTDC) and fugitive sources.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (3) The permittee shall collect and record the following information on a daily basis for this emissions unit:
- a. the total amount of hexane input* to the process (purchased), in pounds and gallons;
 - b. the total quantity of soybeans weighed in the preparation process before the hexane extraction operation, in pounds and tons;
 - c. the weighted-average hexane loss rate, in gallons of hexane/ton of crushed soybeans, and in pounds hexane/pound crushed soybeans [a/b];



- d. the rolling, 365-day weighted average hexane loss rate, in gallons of hexane/ton of crushed soybeans, and in pounds hexane/pound crushed soybeans [the sum of c for any 365-day period];
- e. the amount of hexane emitted, in tons; and
- f. the amount of hexane emitted, in tons/rolling, 30-day period.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (4) To demonstrate compliance with the final VOC solvent loss ratio (SLR) [0.20 gal/ton] limit, the permittee shall:
 - a. maintain the records required by 40 CFR, Part 63, Subpart GGGG on solvent loss and quantity of oilseed processed; and
 - b. maintain the records as required by 40 CFR, Part 63, Subpart GGGG, for any malfunction period as defined in Section 7.0 of the Consent Decree.

[OAC rule 3745-77-07(C)(1) and U.S. EPA Consent Decree]

- (5) 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 cyclone serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2853(a), (b) and (c)	determination of actual solvent loss
63.2854(a) and (b)	determination of the weighted average volume fraction of HAP in the actual solvent loss
63.2855(a), (b) and (c)	determination of the quantity of oilseed processed
63.2862(a), (b), (c), (d) and (e)	records requirements



63.2863(a), (b) and (c)	form and length of retention of records
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[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (2) The permittee shall submit quarterly deviation (excursion) reports for the following for this emissions unit:
 - a. any monthly record that shows an exceedance of the limitation of 140,000 gallons (392 tons) hexane/rolling 12-month period;
 - b. any daily record that shows an exceedance of the limitation of 0.24 gallon hexane/ton of crushed soybeans (0.000671 pound of hexane/pound of crushed soybeans) based on a 365-day-day rolling, weighted average; and
 - c. any daily record that shows an exceedance of the limitation of 65.32 tons/rolling, 30-day period.

All quarterly deviation reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (3) The permittee shall submit annual reports of the following information:
 - a. the total hexane usage, in gallons; and
 - b. the total hexane emissions, in tons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- (4) In the semiannual reports due six months after the Interim Limit Start Date (as the term is defined in the Consent Decree), and every six months thereafter, as required by Paragraph 47 of the Consent Decree, or in a separate report if the permittee requests and EPA approves an extension, the permittee shall submit reports to EPA and the appropriate State agency identifying the plants at which VOC reduction projects have been installed since the last reporting period and the permittee's tentative projections for the remaining installations, to demonstrate that the deadlines in each plant-specific CTP



have been and will be met. If the permittee undertakes any project for the primary purpose of reducing VOC emissions from the plant that is not described in this or any plant-specific CTP, the permittee shall include these projects in the semiannual report for that period.

[OAC rule 3745-77-07(C)(1) and U.S. EPA Consent Decree]

- (5) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the cyclone serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall submit reports and notifications to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR, Part 63, Subpart GGGG, including the following sections:

63.2860(d)	notification of compliance status
63.2861(a), (b), (c) and (d)	reporting requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

f) Testing Requirements

- a. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- b. The emission testing shall be conducted within 3 months after issuance of the permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
- c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE, in the appropriate averaging periods.
- d. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air



agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

b. Emission Limitations: 65.32 tons OC/rolling, 30-day period and 392.0 tons/rolling, 12-month period

Applicable Compliance Method: The permittee shall demonstrate compliance with the monthly and annual OC emission limitations through the record keeping required in section d)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

c. Emission Limitation: 0.24 gallon OC/ton crushed soybeans, based on a 365-day rolling, weighted average

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC limitation through the record keeping required in section d)(3) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]



- d. Emission Limitation: 0.20 gallons of VOC/ton of oilseed processed

Applicable Compliance Method: Compliance with the VOC solvent loss ratio (SLR) limits in the Consent Decree shall be determined in accordance with 40 CFR, Part 63, Subpart GGGG using the following equation. The permittee shall comply with the interim and final VOC SLR limits pursuant to Section IV of the Consent Decree.

$$\text{Plant Compliance Ratio} = \frac{\text{Plant Actual Solvent Loss (gal)}}{\text{Allowable Solvent Loss (gal)}}$$

Where:

Plant Actual Solvent Loss = Gallons of solvent loss during previous 12 operating months at plant "i"

Allowable Solvent Loss Oilseed "i" = Tons of each oilseed processed at plant "i" during the previous 12 operating months

SLR "i" = Interim or Final SLR, as defined in the CTP, for plant "i"

The permittee is in compliance with the SLR limit if the Plant Compliance Ratio is less than or equal to one. Compliance with the interim and final VOC SLR limits for the soybean extraction plants shall be determined in accordance with 40 CFR, Part 63, Subpart GGGG, with the following exceptions: (1) provisions pertaining to HAP content shall not apply; (2) monitoring and recordkeeping of solvent losses at each plant shall be conducted daily; (3) solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses; and (4) records shall be kept in a similar format as the table in Section 7.3, that show total solvent losses, solvent losses during malfunction periods, and adjusted solvent losses (i.e., total solvent losses minus malfunction losses) monthly and on a 12-month rolling basis.

[OAC rule 3745-77-07(C)(1) and USEPA Consent Decree]

- e. Emission Limitation: 0.01 gr PE/dscf

Applicable Compliance Method: The permittee shall demonstrate compliance with the PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-08866]

- f. Emission Limitation: solvent loss factor – 0.2 gal/ton

Applicable Compliance Method: Compliance shall be based on the requirements specified in section b)(2)d. of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG]

- g) Miscellaneous Requirements

- (1) None.



18. P047, 0351010002P047

Operations, Property and/or Equipment Description:

COLLET ASPIRATION

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emission (PE) shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-31-05 PTI #03-9023, issued 7/19/95)	2.42 lbs PE/hr and 10.60 tons PE/yr 1.45 lbs particulate matter less than 10 microns in size (PM10)/hr and 6.37 tons PM10/yr

(2) Additional Terms and Conditions

a. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

b. The permittee shall employ a cyclone to control all of the PE from this emissions unit.

c) Operational Restrictions

(b) None.

d) 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 cyclone serving this emissions unit. The presence or absence of any visible emissions shall be



noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) 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 cyclone serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) 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 six months of the issuance of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass PE and PM10 rates.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
 - PE: Methods 1 - 5 of 40 CFR, Part 60, Appendix A
 - PM10 : Methods 1 - 4 and Methods 201 or 201A and 202 of 40 CFR, Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.



Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-09023]

b. Emission Limitation: 2.42 lbs PE/hr and 10.60 tons PE/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A. The permittee may also determine compliance with this limitation by multiplying the maximum outlet concentration (per stack test data) (0.0062 grain/cubic foot) by the total maximum volumetric air flow rate (38,000 cubic feet/minute) through the cyclone and by 60, and then dividing by 7000.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-09023]



- c. Emission Limitation: 1.45 lbs PM10/hr and 6.37 tons PM10/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the PE limitation based upon the results of emission testing conducted in accordance with Methods 1 - 4 of 40 CFR, Part 60, Appendix A and Methods 201 or 201A and 202.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-09023]

- g) Miscellaneous Requirements

- (1) None.



19. P049, 0351010002P049

Operations, Property and/or Equipment Description:

BEAN HEATER

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3) (PTI #03-13909, issued 11/21/02)	0.73 lb particulate emissions (PE)/hr and 3.20 tons PE/yr Visible PE shall not exceed 0% opacity as a 6-minute average. See b)(2)b.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

b. Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of a cyclone with a 95% control efficiency.

c) Operational Restrictions

(1) None.

d) 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 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. The total duration of any visible emission incident; and
- c. Any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-13909]

e) Reporting Requirements

- (1) 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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-13909]

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitations: 0.73 lb PE/hr and 3.20 tons PE/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly PE emission limitation by applying a 95% control efficiency for use of a cyclone to a maximum uncontrolled emission rate of 14.6 lbs per hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

The tons/yr limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13909]

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

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13909]

g) Miscellaneous Requirements

- (1) None.



20. P901, 0351010002P901

Operations, Property and/or Equipment Description:

SOYBEAN MEAL LOADOUT

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-07(B)	See b)(2)a.
c.	OAC rule 3745-17-08(B)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	39.8 lbs PE/hour

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. The permittee shall employ a baghouse to control the PE from this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in



accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 39.8 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed maximum outlet concentration (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (10,000 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



21. P902, 0351010002P902

Operations, Property and/or Equipment Description:

ELEVATOR RAIL RECEIVING

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-07(B)	See b)(2)a.
c.	OAC rule 3745-17-08(B)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	73.0 lbs PE/hour

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. The permittee shall employ a baghouse to control the PE from this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in



accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 73.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed maximum outlet concentration (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (22,500 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



22. P903, 0351010002P903

Operations, Property and/or Equipment Description:

NORTH TRUCK DUMP

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-07(B)	See b)(2)a.
c.	OAC rule 3745-17-08(B)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	73.0 lbs PE/hour
e.	40 CFR, Part 64	See d) and e)

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. The permittee shall employ a baghouse to control the PE from this emissions unit

c) Operational Restrictions

(c) None.

d) Monitoring and/or Recordkeeping Requirements

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



monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

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

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations, and visible emissions checks. When the static pressure drop or visible emissions show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.



[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (3) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (5) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:

- a. checking the bags / filters for deterioration or degradation;
- b. checking the cleaning system for proper operation; and
- c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:

- a. filter bags;
- b. timing boards and solenoid coils (for blow down function);
- c. diaphragms and diaphragm seal kits;
- d. spare set of belts; and
- e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 73.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed maximum outlet concentration (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (22,500 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0087305

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



23. P904, 0351010002P904

Operations, Property and/or Equipment Description:

ESCHER WYSS

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(d) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-07(B)	See b)(2)a.
c.	OAC rule 3745-17-08(B)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	73.0 lbs PE/hour
e.	OAC rule 3745-31-05 (PTI #03-1331, issued 7/20/83)	See b)(2)c.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. No limitations were established pursuant to OAC rule 3745-31-05.

d. The permittee shall employ a baghouse to control the PE from this emissions unit.

c) Operational Restrictions

(1) None.



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

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) 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 cyclone serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

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

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 73.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed outlet grain loading (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (22,500 cu. ft/minute) through the cyclone and by 60, and then dividing by 7000.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

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If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



24. P905, 0351010002P905

Operations, Property and/or Equipment Description:

SOUTH TRUCK DUMP

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-31-05(A)(3) (PTI #03-17073, issued 5/18/06)	7.75 tons fugitive particulate matter less than 10 microns in size (PM10)/year 23.65 tons fugitive particulate emissions (PE)/year 0.005 grains (gr) PM10/dry standard cubic foot (dscf) and 2.18 tons PM10/year [See b)(2)e] See b)(2)f. and b)(2)g.
f.	40 CFR, Part 60, Subpart DD	no process emission (from baghouse) of particulate matter shall be discharged that exhibits greater than 0% opacity no fugitive emission (from truck unloading station) shall be discharged that exhibits greater than 5% opacity See b)(2)h
g.	40 CFR, Part 64	See d) and e)

(2) Additional Terms and Conditions

a. The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 60, Subpart DD.



- 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).
- c. Bunge North America (East) LLC 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.
- d. The emission limitation specified by this rule is less stringent than the emission limitation (gr/dscf) established pursuant to OAC rule 3745-31-05(A).
- e. All stack emissions of particulate matter are PM10.
- f. Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a baghouse with a maximum outlet concentration of 0.005 gr PM10/dscf.
- g. The requirements of this rule also include compliance with the opacity requirements of 40 CFR Part 60 Subpart DD.
- h. The gr/dscf emission limitation specified by this rule (for the baghouse) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period



of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17073]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations, and visible emissions checks. When the static pressure drop or visible emissions show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (3) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(b)]

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]



- (e) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (5) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
 - a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(d)]

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.



If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and PTI #03-17073]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) 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 startup of such emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable maximum outlet concentration for PM10 and opacity requirements.
- c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations: for PM10, Methods 201/201A and 202 of 40 CFR Part 51, Appendix M, and for Opacity, Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.
- d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- (2) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: 0.005 gr PM10/dscf, 2.18 tons PM10/yr

Applicable Compliance Method: The 0.005 gr/dscf limitation is the established BAT maximum outlet concentration for the baghouse. The permittee shall demonstrate compliance with the mass emission limitation by testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency [See f)(1)].



The annual emission limitation was established by the multiplying the maximum outlet concentration of 0.005 gr PM10/dscf, a maximum volumetric flow rate of 11,600 acfm, a conversion factor of 60 minutes/hr, a conversion factor of 1.0 lb/7000 grains, a maximum operating schedule of 8760 hrs/yr, and a conversion factor of 2000 lbs/ton. Therefore provided compliance is shown with the gr/dscf limitation, compliance with the annual limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- b. Emission Limitation: 23.65 tons fugitive PE/year

Applicable Compliance Method: Compliance with the tons of fugitive PE limitation shall be demonstrated by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.180 lb PE/ton, the maximum hourly throughput rate of 600 tons/hr, the capture efficiency of 95% (1-0.95) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- c. Emission Limitation: 7.75 tons fugitive PM10/year

Applicable Compliance Method: Compliance with the tons of fugitive PM10/yr limitation shall be demonstrated by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.059 lb PM10/ton, the maximum hourly throughput rate of 600 tons/hr, the capture efficiency of 95% (1-0.95) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- d. Emission Limitation: no process emission (from baghouse) of particulate matter shall be discharged that exhibits greater than 0% opacity

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above by testing conducted in accordance with Method 9 of 40 CFR, Part 60, Appendix A [See f)(1)].

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- e. Emission Limitation: no fugitive emission (from truck unloading station) shall be discharged that exhibits greater than 5% opacity

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above by testing conducted in accordance with Method 9 of 40 CFR, Part 60, Appendix A [See f)(1)].

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- g) Miscellaneous Requirements

- (1) None.



25. P906, 0351010002P906

Operations, Property and/or Equipment Description:

2-3 TRACK RAIL / TRUCK UNLOADING

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17131, issued 2/1/07)	0.003 grains (gr) particulate emissions (PE)/dry standard cubic foot (dscf), 0.13 lb PE/hr and 0.57 tons PE/yr [See b)(2)a] 2.10 tons fugitive PE/yr 0.51 tons fugitive particulate matter less than 10 microns in size (PM10)/yr See b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-07(B)	See b)(2)d.
d.	OAC rule 3745-17-08(B)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)f.
f.	40 CFR, Part 60, Subpart DD	See b)(2)g. and b)(2)h.

(2) Additional Terms and Conditions

- a. All PE is assumed to be particulate matter less than 10 microns in size (PM10).
- b. The "Best Available Technology" (BAT) control requirements for this emissions unit have been determined to be the use of baghouse with a maximum outlet grain loading of 0.003 gr PE/dscf, the use of an enclosure, compliance with the terms and conditions of this permit and includes compliance with 40 CFR, Part 60, Subpart DD.
- c. These emissions units are exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.



- d. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
 - e. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
 - f. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Marion County.
 - g. No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:
 - i. Exhibits greater than 0 percent opacity.
 - h. No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:
 - i. Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on weekly basis.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective



action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 0.5 to 8 inches of water.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitations: 0.003 gr PE/dscf, 0.13 lb PE/hr, 0.57 tons PE/yr

Applicable Compliance Method: The 0.003 gr/dscf limitation is the established BAT maximum outlet concentration. The lb PE/hr limitation was established by multiplying the maximum outlet concentration of 0.003 gr/dscf by the maximum volumetric air flow (5000 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr. Compliance with the tons PE/yr limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]



b. Emission Limitation: 2.10 tons fugitive PE/yr

Applicable Compliance Method: The tons of fugitive PE/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.032 lb PE/ton, the maximum hourly throughput rate of 50 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

c. Emission Limitation: 0.51 tons fugitive PM10/yr

Applicable Compliance Method: The tons of fugitive PM10/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.0078 lb PM10/ton, the maximum hourly throughput rate of 50 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

d. Emission Limitation: No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which: exhibits greater than 0 percent opacity.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

e. Emission Limitation: No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

g) Miscellaneous Requirements

(1) None.