

Statement of Basis For Title V Permit

Company Name	The Andersons River Elevator		
Premise Number	0448010495		
Number of Non-insignificant Emissions Units	5		
What makes this facility a Title V facility?	PM10		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	NA		

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
NA			

- **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.

- If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F001 - Truck dumps #1, #2, #3, #4, #5 & #6;	see a. see b.	17-07(B) (1) 17-08(B) (3)		N N	Y Y	Y Y	Y Y	Y Y	N N	Basis - F001 is a truck dump at a 1960's grain facility. NSPS is not applicable. No tons per year limitation. OR - appropriate monitoring, recordkeeping and operational restrictions have been specified for the operational restriction and are applicable.
F002 - legs, transferring and conveyors, and screening and cleaning	see a. see b.	17-07(B) (1) 17-08(B) (3)		N N	Y Y	Y Y	Y Y	Y Y	N N	Basis - F002 is for the elevator operations at a 1978 PTI. NSPS is not applicable. No tons per year limitation. Exhaust gas compliance is determined by 17-08(B)(3) emissions limitations. Adequate enclosure is determined by 17-07(B)(1). OR - appropriate monitoring, recordkeeping and operational restrictions have been specified for the operational restriction and are applicable.
F003 - railcar loading and railcar unloading station	see a. see b.	17-07(B) (1) 17-08(B) (3)		N N	Y Y	Y Y	Y Y	Y Y	N N	Basis - F003 is for railcar loading and unloading. NSPS is not applicable. No tons per year limitation. Compliance is determined by 17-08(B)(3) baghouse exhaust emissions limitation, and compliance is also determined by 17-07(B)(1), and compliance is also determined by 17-07(B)(1), and compliance is also determined by 17-07(B)(1), and compliance is also determined by 17-07(B)(1). OR - appropriate monitoring, recordkeeping and operational restrictions have been specified for the operational restriction and are applicable.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F004 - Seven shiploadi ng spouts with oil spray for dust suppressi on	see c.		40 CFR 52.18 70(c)(77)	Y	Y	Y	Y	Y	N	Basis - F004 is for ship loading at a 1960's grain applicable. No tons per year limitation was set. visible emissions readings and by the applicatio suppressant. The Andersons performed extensi 1985 to establish oil application as a federally r permit limitations were determined by a finding in the Federal Register. Compliance is determin only. No oil application rate was specified in th OR - Annual throughput of "specialty grain" is for which the customer can accept no oil additi for shipment to Japan, although other customer Appropriate monitoring, recordkeeping and rep specified for the operational restriction and CAI
F005 - Paved and unpaved roadway s and parking areas	see d.	17-07(B)4)		N	Y	Y	Y	Y	N	Basis - F005 is for roadways and parking lots at Compliance is determined by visible emissions traveled areas of this facility are paved. While c an "as needed" basis, recordkeeping is required for compliance efforts.
	see e.	17-07(B)5)		N	Y	Y	Y	Y	N	
	see f.	17-08(B) (B)(2), (B)(8), (B)(9)		N	Y	Y	Y	Y	N	OR - appropriate monitoring and recordkeepin; operational restriction and CAM is not current!

- a. The visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average, for the fugitive emissions, except as provided by rule.
- b.
 - i. The permittee shall maintain and operate an enclosure and ventilation system sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture.
 - ii. The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.
- c.
 - i. Visible particulate emissions from the shiploading spouts shall not exceed 20% opacity, except for specialty grain. Visible particulate emissions from the shiploading spouts while loading specialty grain shall not exceed 40% opacity.
 - ii. The control for this emissions unit shall be an oil spray system. This system shall be used during the entire process of shiploading (except for specialty grain), which includes topping off the holds. "Specialty grain" is defined as grain, including oil seeds, intended for a specialty use or process by a purchaser who will not accept the application of oil on the grounds that the oil may affect the process or the end product use. "Topping off" is defined as that portion of the shiploading occurring when the distance between the uppermost part of the grain pile and the top of the hatch opening is four feet or less.
- d. no visible particulate emissions except for 6 minutes during any 60-minute period.
- e. no visible particulate emissions except for 13 minutes during any 60-minute period.
- f. reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust:
 - i. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the paved roadways and parking areas by flushing with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 - ii. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
 - iii. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the unpaved shoulders of all paved roadways with water and/or any other suitable dust suppression chemicals at

- sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- iv. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 - v. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
 - vi. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measures specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
 - vii. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
 - viii. Implementation of the above control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

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

Misc = miscellaneous requirements

• **Instructions for Part III:**

- 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.
- 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. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section.

To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M", "R", "Rp" and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no comments. Also, if a "Y" is noted under "OR" or "Misc," an explanation of the requirements should be provided in the "Comments" section. In addition to a general explanation of the "OR" and/or "Misc," the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the "Miscellaneous Requirements" section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an "N" is noted in the "OR" column or in the "Misc" column.

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