



State of Ohio Environmental Protection Agency

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08/21/97

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

16-77-01-0027
Cargill, Incorporated - Salt Division (Akron, OH)
Steven Karl
2065 Manchester Road
Akron, OH 44314

Dear Steven Karl:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Akron Air Pollution Control within 30 days of the date of publication 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 written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Akron Air Pollution Control.

Very truly yours,

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

cc: USEPA
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Akron Air Pollution Control
Pennsylvania
West Virginia



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 08/21/97

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Cargill, Incorporated - Salt Division (Akron, OH)
2065 Manchester Road
Akron, OH 44314

of a Title V permit for Facility ID: 16-77-01-0027

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:

B001 (Connelly No.3 Boiler)

No. 3 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B002,B003,B004). The normal operating schedule for B001 is 24hrs/day, 7days/wk, 52wks/yr.

B002 (Connelly No. 4 Boiler

)

No. 4 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B003,B004). The normal operating schedule for B002 is 24hrs/day, 7days/wk, 52wks/yr.

B003 (Connelly No. 5 Boiler

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No. 5 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B004). The normal operating schedule for B003 is 24hrs/day, 7days/wk, 52wks/yr.

B004 (Connelly No. 6 Boiler)

No. 6 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B003). The normal operating schedule for B004 is 24hrs/day, 7days/wk, 52wks/yr.

B006 (No. 7 Boiler)

No. 7 boiler is a natural gas fired boiler. The boiler has a maximum heat input capacity of 75 million Btu/hr. The boiler is permitted to operate 24hrs/day, 7days/wk, 48 wks/yr.

K001 (Paint Spray Booth)

Devilbiss paint spray booth, used for maintenance painting activities.

P001 (Dairy Mill Operation)

Process consists of three production lines consisting of mixers, grinders, screeners and packaging units. Sodium chloride is mixed with trace minerals consisting of tricalcium phosphate, sodium ferrocyanide, sodium silicio aluminate and potassium iodide. The particulate emissions associated with these operations are vented through a SLY-JET Venturi Scrubber system.

P004 (Nugget Press

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The nugget production operation consists of a salt compactor, screener, cooler and packaging operation. The process air from the nugget press is vented through a SLY-JET Venturi Scrubber. The process air from the cooling system is vented through a seperate Fisher Klasterman Scrubber.

P006 (VP Salt Dryer)

Salt slurry is heated through the use of natural gas fired vacuum pans and a filter drum dryer. The moisture in the salt slurry is evaporated during this operation.

P901 (Trace Mineral Blending

)

Trace mineral blending and bagging.

P902 (DuraCube Production Line

)

Production of compacted salt for water softener regeneration

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06.

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. 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 are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

4. 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.

5. 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.

6. 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. 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.

7. 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.

8. 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.

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. 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 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 3745-77-07.
- 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.

11. 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.

12. 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:
 - i. 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.
 - ii. 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.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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 appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before March 15th of each year during the permit term.
 - ii. 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.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. 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.

14. 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 3745-77-02(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).

15. 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.

16. 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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001
Z100
Z200
Z300

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Connelly No.3 Boiler (B001)

Activity Description: No. 3 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B002,B003,B004). The normal operating schedule for B001 is 24hrs/day, 7days/wk, 52wks/yr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 3 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B002,B003,B004). The boiler has a maximum heat input capacity of 43 mmBTU/hr.	OAC 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input
	OAC 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

- 2.a** *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

III. Monitoring and/or Record Keeping Requirements

- 1.a A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- 1.b The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

- 1.c Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse once every two hours (12 readings per day).

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No.3 Boiler (B001)**

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office of local air agency.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No.3 Boiler (B001)**

IV. Reporting Requirements (continued)

2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (%) of the coal burned;
 - c. the average sulfur content (%) of the coal burned;
 - d. the average heat content (Btu/lb) of the coal burned; and
 - e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No.3 Boiler (B001)**

V. Testing Requirements

1. Emission Limitation:

0.18 pound of particulate matter per million BTU actual heat input

4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emission testing shall be conducted within 6 months prior to permit renewal;
- b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD 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 Akron RAQMD 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 Akron RAQMD.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No.3 Boiler (B001)**

V. Testing Requirements (continued)

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 4 Boiler (B002)**

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Connelly No. 4 Boiler (B002)

Activity Description: No. 4 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B003,B004). The normal operating schedule for B002 is 24hrs/day, 7days/wk, 52wks/yr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 4 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B003,B004). The boiler has a maximum heat input capacity of 43 mmBTU/hr.	OAC 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input
	OAC 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

- 2.a *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 4 Boiler (B002)**

II. Operational Restrictions (continued)

2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

III. Monitoring and/or Record Keeping Requirements

- 1.a A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- 1.b The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- 1.c Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse once every two hours (12 readings per day).

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 4 Boiler (B002)**

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office of local air agency.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

IV. Reporting Requirements (continued)

2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (%) of the coal burned;
 - c. the average sulfur content (%) of the coal burned;
 - d. the average heat content (Btu/lb) of the coal burned; and
 - e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 4 Boiler (B002)**

V. Testing Requirements

1. Emission Limitation:

0.18 pound of particulate matter per million BTU actual heat input

4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emission testing shall be conducted within 6 months prior to permit renewal;
- b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD 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 Akron RAQMD 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 Akron RAQMD.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 4 Boiler (B002)**

V. Testing Requirements (continued)

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 5 Boiler (B003)**

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Connelly No. 5 Boiler (B003)

Activity Description: No. 5 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B004). The normal operating schedule for B003 is 24hrs/day, 7days/wk, 52wks/yr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 5 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B004). The boiler has a maximum heat input capacity of 43 mmBTU/hr.	OAC 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input
	OAC 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

- 2.a *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 5 Boiler (B003)**

II. Operational Restrictions (continued)

2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

III. Monitoring and/or Record Keeping Requirements

- 1.a A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- 1.b The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- 1.c Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse once every two hours (12 readings per day).

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 5 Boiler (B003)**

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office of local air agency.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 5 Boiler (B003)**

IV. Reporting Requirements (continued)

2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (%) of the coal burned;
 - c. the average sulfur content (%) of the coal burned;
 - d. the average heat content (Btu/lb) of the coal burned; and
 - e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 5 Boiler (B003)**

V. Testing Requirements

1. Emission Limitation:

0.18 pound of particulate matter per million BTU actual heat input

4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emission testing shall be conducted within 6 months prior to permit renewal;
- b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD 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 Akron RAQMD 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 Akron RAQMD.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 5 Boiler (B003)**

V. Testing Requirements (continued)

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 6 Boiler (B004)**

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Connelly No. 6 Boiler (B004)

Activity Description: No. 6 coal fired boiler is vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B003). The normal operating schedule for B004 is 24hrs/day, 7days/wk, 52wks/yr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 6 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B003). The boiler has a maximum heat input capacity of 43 mmBTU/hr.	OAC 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input
	OAC 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

- 2.a *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 6 Boiler (B004)**

II. Operational Restrictions (continued)

2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

III. Monitoring and/or Record Keeping Requirements

- 1.a A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- 1.b The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- 1.c Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse once every two hours (12 readings per day).

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 6 Boiler (B004)**

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office of local air agency.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

IV. Reporting Requirements (continued)

2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (%) of the coal burned;
 - c. the average sulfur content (%) of the coal burned;
 - d. the average heat content (Btu/lb) of the coal burned; and
 - e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 6 Boiler (B004)**

V. Testing Requirements

1. Emission Limitation:

0.18 pound of particulate matter per million BTU actual heat input

4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emission testing shall be conducted within 6 months prior to permit renewal;
- b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD 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 Akron RAQMD 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 Akron RAQMD.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Connelly No. 6 Boiler (B004)**

V. Testing Requirements (continued)

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **No. 7 Boiler (B006)**

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 7 Boiler (B006)

Activity Description: No. 7 boiler is a natural gas fired boiler. The boiler has a maximum heat input capacity of 75 million Btu/hr. The boiler is permitted to operate 24hrs/day, 7days/wk, 48 wks/yr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 7 boiler is a natural gas-fired boiler with a low NOx burner. The boiler has a maximum heat input capacity of 75 million Btu/hr.	OAC 3745-17-07	20% opacity as a 6-minute average, except as provided by rule
	OAC 3745-17-10	0.020 lb/mmBtu of particulate matter
	40 CFR 60, Subpart Dc	See A.III.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record the natural gas usage for this emissions unit on a continuous basis.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **No. 7 Boiler (B006)**

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitation:

0.020 lb/mmBtu of particulate matter

Applicable Compliance Method:

Particulate emissions shall be calculated using the AP-42 emission factor for particulate emissions resulting from the operation of natural gas fired fuel burning equipment. The filterable particulate emission factor of 6.2 pounds per million cubic feet shall be divided by 1000 Btu per standard cubic foot to calculate a particulate emission rate of 0.0062 pound per million Btu.

The particulate emission factor was obtained from AP-42, 5th edition, chapter 1.4, table 1.4-2.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

VI. Miscellaneous Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **No. 7 Boiler (B006)**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 7 boiler is a natural gas fired boiler with a low NOx burner. The boiler has a maximum heat input capacity of 75 million Btu/hr.	OAC 3745-31-05 See B.VI below.	0.10 lb/mmBtu of nitrogen oxides
	OAC 3745-31-05 See B.VI below.	4.58 lbs/hr of carbon monoxide

2. Additional Terms and Conditions

- 2.a The permittee shall employ low NOx burner technology in this emissions unit.

II. Operational Restrictions

1. The permittee shall use only natural gas as fuel for this emissions unit.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **No. 7 Boiler (B006)**

V. Testing Requirements (continued)

1.a Emission Limitation:

0.10 lb/mmBtu of nitrogen oxides

Applicable Compliance Method:

Divide the nitrogen oxides emission factor of 83 pounds of nitrogen oxides per million cubic feet by 1000 Btu per standard cubic foot.

The nitrogen oxides emission factor was obtained from AP-42, 5th edition, chapter 1.4, table 1.4-1.

1.b Emission Limitation:

4.58 lbs/hr of carbon monoxide

Applicable Compliance Method:

Divide the carbon monoxide emission factor of 61 pounds of carbon monoxide per million cubic feet by 1000 Btu per standard cubic foot, and multiply by the maximum heat input of 75 million Btu per hour.

The carbon monoxide emission factor was obtained from AP-42, 5th edition, chapter 1.4, table 1.4-1.

VI. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements contained in the permit to install #16-1470 issued for this emissions unit on June 14, 1995:

B.I.1, B.I.2, B.II.1, B.V.1.a, and B.V.1.b.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Booth (K001)

Activity Description: Devilbiss paint spray booth, used for maintenance painting activities.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
DeVilbiss paint spray booth with exhaust filter system, used for maintenance painting activities.	OAC 3745-21-09(U)	See A.II.1 below.

2. Additional Terms and Conditions

- 2.a The permittee shall operate and maintain the exhaust filter system in accordance with the manufacturer's recommendations, instructions and operating manual(s).

II. Operational Restrictions

1. The permittee shall use no more than 10 gallons of coating per day in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Paint Spray Booth (K001)**

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 exceedance occurs.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
DeVilbiss paint spray booth with exhaust filter system, used for maintenance painting activities.	OAC 3745-31-05 See B.VI below.	4.17 lbs/hr of VOC

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating and cleanup material employed;
 - c. the VOC content, in pounds per gallon, of each coating and cleanup material employed;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).
2. The permittee shall maintain appropriate Material Safety Data Sheets (MSDS) for each coating and cleanup material employed to allow for material balance calculations to estimate total VOC emission rates.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Paint Spray Booth (K001)**

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly VOC emissions from all coatings and cleanup materials exceeded 4.17 pounds per hour, and the actual average hourly VOC emissions for each such day.

V. Testing Requirements

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

- 1.a Emission Limitation:

4.17 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements contained in Sections B.III.1 and B.III.2 above. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

VI. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements contained in the permit to install #16-1110 issued for this emissions unit on December 18, 1991:

B.I.1, B.III.1, B.III.2, B.IV.1, and B.V.1.a.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Dairy Mill Operation (P001)**

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dairy Mill Operation (P001)

Activity Description: Process consists of three production lines consisting of mixers, grinders, screeners and packaging units. Sodium chloride is mixed with trace minerals consisting of tricalcium phosphate, sodium ferrocyanide, sodium silicio aluminate and potassium iodide. The particulate emissions associated with these operations are vented through a SLY-JET Venturi Scrubber system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Process consists of three production lines consisting of mixers, grinders, screeners and packaging units.	OAC 3745-17-11	total of 7.23 pounds per hour of particulate matter
Sodium chloride is mixed with trace minerals consisting of tricalcium phosphate, sodium ferrocyanide, sodium silicio aluminate and potassium iodide. The particulate emissions associated with these operations are vented through a SLY-JET venturi scrubber system.	OAC 3745-17-07	20% opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a The permittee shall operate and maintain the venturi scrubber in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- 2.b All particulate emissions from the production lines constituting this emissions unit shall be vented to the venturi scrubber.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Dairy Mill Operation (P001)**

II. Operational Restrictions

1. While the emissions unit is in operation, the pressure drop across the scrubber (inches of water) shall be maintained at the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

While the emissions unit is in operation, the scrubber liquid flow rate (gallons per minute) shall be maintained at the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

III. Monitoring and/or Record Keeping Requirements

1. Within 90 days of the issuance of this permit, the permittee shall install equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate.
2. The permittee shall properly operate and maintain the equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate while the emissions unit is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameters. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

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

- a. the differential air pressure across the scrubber, on a continuous basis;
 - b. the scrubber liquid flow rate, on a continuous basis; and
 - c. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
 4. The information required in A.III.2 and A.III.3 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
 5. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall record the measurements of both the differential air pressure across the scrubber and the scrubber liquid flow rate.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Dairy Mill Operation (P001)**

IV. Reporting Requirements

1. The permittee shall submit differential air pressure and scrubber liquid flow rate deviation (excursion) reports that identify all periods of time during which the differential air pressure and the scrubber liquid flow rate differ by more than plus or minus 30 percent from the average values determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

V. Testing Requirements

- 1.a Emission Limitation:

7.23 pounds per hour of particulate matter

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

The permittee shall conduct, or have conducted, particulate matter emission testing for this emissions unit to demonstrate compliance with the 7.23 pounds per hour emission limitation in accordance with the following requirements:

- a. the emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal;
- b. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for particulate matter: Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Dairy Mill Operation (P001)**

V. Testing Requirements (continued)

- 1.b** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD 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 Akron RAQMD 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 Akron RAQMD.

- 2.** Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible particulate emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Nugget Press (P004)

Activity Description: The nugget production operation consists of a salt compactor, screener, cooler and packaging operation. The process air from the nugget press is vented through a SLY-JET Venturi Scrubber. The process air from the cooling system is vented through a separate Fisher Klasterman Scrubber.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
The nugget production operation consists of a salt compactor, screener, cooler and packaging operation. The process air from the nugget press is vented through a SLY-JET venturi scrubber. The process air from the cooling system is vented through a separate Fisher Klosterman venturi scrubber.	See A.VI below. OAC 3745-17-07 OAC 3745-17-11	See A.I.2.a below. 20% opacity as a six-minute average, except as provided by rule total of 9.79 pounds per hour of particulate matter from the entire operation

2. Additional Terms and Conditions

- 2.a** The total particulate matter emission limitation shall be calculated using OAC rule 3745-17-11, Figure II.
- 2.b** All particulate emissions shall be vented to either the W.W. Sly No. 175 venturi scrubber identified as collector "A" or the Fisher-Klosterman MS-600-H venturi scrubber identified as collector "B".

II. Operational Restrictions

1. While the emissions unit is in operation, the pressure drop across the scrubbers identified as collectors "A" and "B" shall be maintained at the average values, in inches of water, determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

While the emissions unit is in operation, the scrubber liquid flow rates for the scrubbers identified as collectors "A" and "B" shall be maintained at the average values, in gallons per minute, determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

III. Monitoring and/or Record Keeping Requirements

1. Within 90 days of the issuance of this permit, the permittee shall install equipment for each scrubber to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate.
2. The permittee shall properly operate and maintain the equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate while the emissions unit is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameters. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

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

- a. the differential air pressure across the scrubber, on a continuous basis;
 - b. the scrubber liquid flow rate, on a continuous basis; and
 - c. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
 4. The information required in A.III.2 and A.III.3 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
 5. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall continuously record for each scrubber the measurements of both the differential air pressure across the scrubber and the scrubber liquid flow rate.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Nugget Press (P004)**

IV. Reporting Requirements

1. The permittee shall submit differential air pressure and scrubber liquid flow rate deviation (excursion) reports that identify all periods of time during which the differential air pressures and the scrubber liquid flow rates differ by more than plus or minus 30 percent from the average values determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

V. 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 and within 6 months prior to permit renewal;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
 - d. the test 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 Akron RAQMD.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Nugget Press (P004)**

V. Testing Requirements (continued)

2. Emission Limitation:

9.79 pounds per hour of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible particulate emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

VI. Miscellaneous Requirements

- 1.** The following term and condition and those listed in section B.VI shall supersede all the air pollution control requirements contained in the permit to install #16-1117 issued for this emissions unit on May 20, 1992: A.I.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
The nugget production operation consists of a salt compactor, screener, cooler and packaging operation. The process air from the nugget press is vented through a SLY-JET venturi scrubber. The process air from the cooling system is vented through a separate Fisher Klasterman venturi scrubber.	OAC 3745-31-05 See B.VI below.	0.80 lb/hr of PM10

2. Additional Terms and Conditions

- 2.a The permittee shall operate and maintain each wet scrubber in accordance with the respective manufacturer's recommendations, instructions and operating manual(s).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Nugget Press (P004)**

V. 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 and within 6 months prior to permit renewal;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PM10;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PM10, Method 201A of 40 CFR Part 51, Appendix M; and
 - d. the test 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 Akron RAQMD.

2. Emission Limitation:

0.80 lb/hr of PM10

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 51, Appendix M, Method 201A.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Nugget Press (P004)**

VI. Miscellaneous Requirements

1. The following terms and conditions and those listed in section A.VI shall supersede all the air pollution control requirements contained in the permit to install #16-1117 issued for this emissions unit on May 20, 1992:

B.I.1, B.I.2, B.V.1 and B.V.2.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: VP Salt Dryer (P006)

Activity Description: Salt slurry is heated through the use of natural gas fired vacuum pans and a filter drum dryer. The moisture in the salt slurry is evaporated during this operation.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Salt slurry is heated through the use of natural gas fired vacuum pans and a filter drum dryer. The moisture in the salt slurry is evaporated during this operation. The process air is vented to an F.F. Vee Equipment cyclone.	OAC 3745-17-11	9.63 pounds per hour of particulate matter
	OAC 3745-17-07	20% opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a The permittee shall operate and maintain the single-stage cyclone in accordance with the manufacturer's recommendations, instructions and operating manual(s).

II. Operational Restrictions

1. While the emissions unit is in operation, the pressure drop across the cyclone shall be maintained at the average value, in inches of water, determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

III. Monitoring and/or Record Keeping Requirements

1. Within 90 days of the issuance of this permit, the permittee shall install equipment to continuously monitor and record the change in pressure of the gas stream across the cyclone.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall properly operate and maintain equipment to continuously monitor and record the change in pressure of the gas stream across the cyclone while the emissions unit is in operation. The monitoring device and recorder shall be capable of accurately measuring the desired parameter. The monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

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

- a. the differential air pressure across the cyclone, on a continuous basis; and
 - b. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
 4. The information required in A.III.2 and A.III.3 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
 5. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall record the measurement of the differential air pressure across the cyclone.

IV. Reporting Requirements

1. The permittee shall submit differential air pressure deviation (excursion) reports that identify all periods of time during which the differential air pressure differs by more than plus or minus 30 percent from the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

V. 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 and within 6 months prior to permit renewal;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
 - d. the test 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.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **VP Salt Dryer (P006)**

V. Testing Requirements (continued)

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 Akron RAQMD.

2. Emission Limitation:

9.63 pounds per hour of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: Cargill, Incorporated - Salt Division (Akron, OH)

Facility ID: 16-77-01-0027

Emissions Unit: Trace Mineral Blending (P901)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Trace Mineral Blending (P901)

Activity Description: Trace mineral blending and bagging.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
The trace mineral blending process consists of a conveyor, grinder, blenders and packaging operation. The particulate emissions associated with this process are vented through a SLY-JET venturi scrubber system.	See A.VI below.	See A.V.1 below.
	OAC 3745-17-07	See A.I.2.b below.
	OAC 3745-17-08	See A.I.2.c below.
	OAC 3745-17-11	See A.I.2.c below.
	40 CFR Part 60, Subpart OOO	See A.I.2.b, A.I.2.d and A.I.2.e below.

2. Additional Terms and Conditions

- 2.a The permittee shall operate and maintain the venturi scrubber in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- 2.b In accordance with the requirements of 40 CFR 60.672(a)(2), due to the wet scrubbing control device, the stack opacity limit is waived and the permittee shall comply with the recordkeeping and reporting provisions of 40 CFR 60.676(c), (d) and (e).
- 2.c The particulate emission rate limitation required by 40 CFR 60.672(a)(1) is more stringent than the particulate emission rate limitations required by OAC rule 3745-17-08(B)(3)(b) and OAC rule 3745-17-11.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Trace Mineral Blending (P901)**

2. Additional Terms and Conditions (continued)

2.d The stack particulate emission rate shall not exceed 0.05 gram per dry standard cubic meter, as required by 40 CFR 60.672(a)(1).

2.e No visible, fugitive particulate emissions shall be emitted from the building enclosing this emissions unit.

II. Operational Restrictions

1. While the emissions unit is in operation, the pressure drop across the scrubber (inches of water) shall be maintained at the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

While the emissions unit is in operation, the scrubber liquid flow rate (gallons per minute) shall be maintained at the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

III. Monitoring and/or Record Keeping Requirements

1. Within 90 days of the issuance of this permit, the permittee shall install and calibrate equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate. The monitoring device and recorder shall be installed and calibrated in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop monitoring device shall be certified by the manufacturer to be accurate within plus or minus 250 pascals or plus or minus 1 inch water gauge pressure.

The scrubber liquid flow rate monitoring device shall be certified by the manufacturer to be accurate within plus or minus 5% of the design scrubber liquid flow rate.

2. The permittee shall properly operate and maintain the equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop and scrubber liquid flow rate monitoring devices shall be calibrated on an annual basis in accordance with the manufacturer's instructions.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Trace Mineral Blending (P901)**

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each day:
 - a. the differential air pressure across the scrubber, on a continuous basis;
 - b. the scrubber liquid flow rate, on a continuous basis; and
 - c. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
5. The information required in A.III.3 and A.III.4 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
6. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall record the measurements of both the differential air pressure across the scrubber and the scrubber liquid flow rate.

IV. Reporting Requirements

1. The permittee shall submit differential air pressure and scrubber liquid flow rate deviation (excursion) reports that identify all periods of time during which the differential air pressure and the scrubber liquid flow rate differ by more than plus or minus 30 percent from the average values determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

V. 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 and within 6 months prior to permit renewal;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
 - d. the test 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.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Trace Mineral Blending (P901)**

V. Testing Requirements (continued)

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 Akron RAQMD.

2. Emission Limitation:

0.05 gram per dry standard cubic meter of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

3. Emission Limitation:

no visible particulate emissions

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 22

VI. Miscellaneous Requirements

1. The following terms and conditions and those listed in section B.VI shall supersede all the air pollution control requirements contained in the permit to install #16-1381 issued for this emissions unit on June 29, 1994:

A.V.1, A.V.2 and A.V.3.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
The trace mineral blending process consists of a conveyor, grinder, blenders and packaging operation. The particulate emissions associated with this process are vented through a SLY-JET venturi scrubber system.	OAC 3745-31-05 See B.VI below.	See B.I.2.a, B.I.2.b and B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall vent all particulate matter emissions from the process equipment to a venturi scrubber.
- 2.b Particulate emissions from emissions unit P901 shall not exceed 2.0 pounds per hour.
- 2.c The visible particulate emissions from emissions unit P901 shall not exceed 5.0% opacity as a six-minute average. If the permittee complies with the recordkeeping and reporting requirements listed in A.I.2.b, the 5% opacity limitation shall not be applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **Trace Mineral Blending (P901)**

V. Testing Requirements

1. Emission Limitation:

2.0 pounds per hour of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

2. Emission Limitation:

5.0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible particulate emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

VI. Miscellaneous Requirements

1. The following terms and conditions and those listed in section A.VI shall supersede all the air pollution control requirements contained in the permit to install #16-1381 issued for this emissions unit on June 29, 1994:

B.I.1, B.I.2, B.V.1 and B.V.2.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **DuraCube Production Line (P902)**

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: DuraCube Production Line (P902)

Activity Description: Production of compacted salt for water softener regeneration

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Production of compacted salt for water softener regeneration. The operation consists of a flake breaker, conveyor, elevator, screener, storage bin and packaging operation. The process air from the DuraCube production line is vented through a Fisher-Klosterman venturi scrubber. The process air from the cooling system is vented through a separate Fisher-Klosterman venturi scrubber.	See A.VI below.	See A.V.1 below.
	OAC 3745-17-07	See A.I.2.b below.
	OAC 3745-17-08	See A.I.2.b, A.I.2.c and A.I.2.e below.
	OAC 3745-17-11	See A.I.2.c below.
	40 CFR Part 60, Subpart OOO	See A.I.2.b, A.I.2.d and A.I.2.e below.

2. Additional Terms and Conditions

- 2.a The permittee shall operate and maintain the venturi scrubbers in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- 2.b In accordance with the requirements of 40 CFR 60.672(a)(2), due to the wet scrubbing control device, the stack opacity limit is waived and the permittee shall comply with the recordkeeping and reporting provisions of 40 CFR 60.676(c), (d) and (e).

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **DuraCube Production Line (P902)**

2. Additional Terms and Conditions (continued)

- 2.c** The particulate emission rate limitation required by 40 CFR 60.672(a)(1) is more stringent than the particulate emission rate limitations required by OAC rule 3745-17-08(B)(3)(b) and OAC rule 3745-17-11.
- 2.d** The stack particulate emission rate shall not exceed 0.05 gram per dry standard cubic meter, as required by 40 CFR 60.672(a)(1).
- 2.e** No visible, fugitive particulate emissions shall be emitted from the building enclosing this emissions unit.
- 2.f** The Fisher-Klosterman M.S.-550-H venturi scrubber is identified as collector"A" and the Fisher-Klosterman M.S.-400 venturi scrubber is identified as collector"B".

II. Operational Restrictions

- 1. While the emissions unit is in operation, the pressure drop across the scrubbers identified as collectors "A" and "B" shall be maintained at the average values, in inches of water, determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

While the emissions unit is in operation, the scrubber liquid flow rates for the scrubbers identified as collectors "A" and "B" shall be maintained at the average values, in gallons per minute, determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

III. Monitoring and/or Record Keeping Requirements

- 1. Within 90 days of the issuance of this permit, the permittee shall install and calibrate equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate. The monitoring device and recorder shall be installed and calibrated in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop monitoring device shall be certified by the manufacturer to be accurate within plus or minus 250 pascals or plus or minus 1 inch water gauge pressure.

The scrubber liquid flow rate monitoring device shall be certified by the manufacturer to be accurate within plus or minus 5% of the design scrubber liquid flow rate.

- 2. The permittee shall properly operate and maintain the equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop and scrubber liquid flow rate monitoring devices shall be calibrated on an annual basis in accordance with the manufacturer's instructions.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **DuraCube Production Line (P902)**

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each day:
 - a. the differential air pressure across the scrubber, on a continuous basis;
 - b. the scrubber liquid flow rate, on a continuous basis; and
 - c. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
5. The information required in A.III.3 and A.III.4 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
6. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall record for each scrubber the measurements of both the differential air pressure across the scrubber and the scrubber liquid flow rate.

IV. Reporting Requirements

1. The permittee shall submit differential air pressure and scrubber liquid flow rate deviation (excursion) reports that identify all periods of time during which the differential air pressures and the scrubber liquid flow rates differ by more than plus or minus 30 percent from the average values determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

V. 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 and within 6 months prior to permit renewal;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
 - d. the test 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.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **DuraCube Production Line (P902)**

V. Testing Requirements (continued)

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 Akron RAQMD.

2. Emission Limitation:

0.05 g/dscm of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

3. Emission Limitation:

no visible particulate emissions

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 22

VI. Miscellaneous Requirements

1. The following terms and conditions and those listed in section B.VI shall supersede all the air pollution control requirements contained in the permit to install #16-1523 issued for this emissions unit on February 22, 1996:

A.V.1, A.V.2 and A.V.3.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **DuraCube Production Line (P902)**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Production of compacted salt for water softener regeneration. The operation consists of a flake breaker, conveyor, elevator, screener, storage bin and packaging operation.	OAC 3745-31-05 See B.VI. below.	See B.I.2.a, B.I.2.b, B.I.2.c and B.I.2.d below.

2. Additional Terms and Conditions

- 2.a The permittee shall vent all particulate matter emissions from the process equipment to the venturi scrubbers.
- 2.b Particulate emissions from emissions unit P902 shall not exceed 4.0 pounds per hour.
- 2.c PM10 emissions from emissions unit P902 shall not exceed 1.4 pounds per hour.
- 2.d The visible particulate emissions from emissions unit P902 shall not exceed 5.0% opacity as a six-minute average. If the permittee complies with the recordkeeping and reporting requirements listed in A.I.2.b, the 5% opacity limitation shall not be applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **DuraCube Production Line (P902)**

V. 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 and within 6 months prior to permit renewal;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for total particulates and PM10;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PM10, Method 201A of 40 CFR Part 51, Appendix M; and
 - d. the test 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 Akron RAQMD.

2. Emission Limitation:

1.4 lbs/hr of PM10

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 51, Appendix M, Method 201A.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID: **16-77-01-0027**

Emissions Unit: **DuraCube Production Line (P902)**

V. Testing Requirements (continued)

3. Emission Limitation:

4.0 lbs/hr of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

4. Emission Limitation:

5% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible particulate emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

VI. Miscellaneous Requirements

1. The following terms and conditions and those listed in section A.VI shall supersede all the air pollution control requirements contained in the permit to install #16-1523 issued for this emissions unit on February 22, 1996:

B.I.1, B.I.2, and B.V.1 through B.V.4.

Facility Name: **Cargill, Incorporated - Salt Division (Akron, OH)**
Facility ID: **16-77-01-0027**

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