



State of Ohio Environmental Protection Agency

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

09/30/99

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

03-72-03-0103  
Great Lakes Sugar Company  
Thomas A. Brickley  
1101 North Front Street  
Fremont, OH 43420

Dear Thomas A. Brickley:

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 Northwest District Office 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 Northwest District Office.**

Very truly yours,

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

cc: USEPA (electronic)  
Jim Orlemann, DAPC Engineering  
Michael Ahern, DAPC PMU  
Northwest District Office  
Michigan



## Ohio EPA

State of Ohio Environmental Protection Agency

### TITLE V PERMIT

Issue Date: 09/30/99

### DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Great Lakes Sugar Company  
1101 North Front Street  
Fremont, OH 43420

of a Title V permit for Facility ID: 03-72-03-0103

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

B004 (#3 Gas Boiler)  
Boiler #3, 200 mmBTU/hr input oil with natural gas standby

B005 (#1 Coal Boiler)  
Boiler #1, 104mmBTU/hr coal boiler w/multiclone and venturi scrubber

B006 (#2 Coal Boiler)  
Boiler #2, 104mmBTU/hr coal boiler w/multiclone and venturi scrubber

P001 (Pellet Mills/Cooler)  
Pellet mills and pellet cooler multiclone (NOTE: Source controlled pollutant emissions rate is 1.04 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78,  $1.04 \text{ lbs/hr} \times 8760 \text{ hrs/yr} / 2000 \text{ lbs/ton} = 4.56 \text{ tons/yr}$ )

P002 (Boiler Ash System)  
8" Steamatic exhauster, w/cyclone and settling chamber ash blowing system (NOTE: Source emissions rate is 2.8 lbs/hr but the exhaust for P002 is vent to a venturi scrubber which is 80% efficient for particulate, therefor the actual emissions is  $(2.8 \text{ lbs/hr} \times 0.2 = 0.56 \text{ lbs/hr})$  and  $0.56 \text{ lbs/hr} \times 8760 \text{ hrs/yr} / 2000 \text{ lbs/ton} = 2.45 \text{ tons/year}$ )

P003 (Pulp Drier)  
Direct fired rotary pulp drier, natural gas or # 6 fuel oil, w/multiclone collector and multiclone aspiration

P004 (Pulp/Pellet Conveying Equipment)  
Scrolls, elevators, and conveying equipment w/multiclone collector for dried pulp and pellets (NOTE:Source controlled pollutant emissions rate is 1.83 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. The equipment operates less than 225 days/yr due to the fact that sugar beets are only available during this time,  $1.83 \text{ lbs/hr} \times 24 \text{ hrs/day} \times 225 \text{ days} / 2000 \text{ lbs/ton} = 4.94 \text{ tons/yr}$ )

P007 (Lime Crusher, Hopper, and Elevator)

Lime crusher, hopper, and elevator w/multiclone collector (NOTE:Source controlled pollutant emissions rate is 1.9 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. The equipment operates less than 219 days/yr due to the fact that sugar beets are only available during this time, 1.9 lbs/hr X 24 hrs/day X 219 days / 2000 lbs/ton = 4.99 tons/yr)

P008 (Top Granulator)

Top granulator rotary sugar dryer w/wet collector (NOTE:Source controlled pollutant emissions rate is 0.27 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. 0.27 lbs/ hr X 8760 hrs/yr / 2000 lbs/ton = 1.18 tons/yr )

P009 (Bottom Granulator)

Bottom granulator rotary sugar dryer w/wet collector (NOTE:Source controlled pollutant emissions rate is 0.27 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. 0.27 lbs/ hr X 8760 hrs/yr / 2000 lbs/ton = 1.18 tons/yr )

P010 (# 1 Sodium Carbonate Tank)

# 1 bulk sodium carbonate tank 50 tons capacity with vent filter system (NOTE:Uncontrolled emissions are 1.7 lbs/hr. The filter system is 99.9 % efficient, so 1.7 lbs/hr X 0.001 X 8760 hrs/yr / 2000 lbs/ton = 0.01 tons/yr).

P011 (# 2 Sodium Carbonate Tank)

# 2 bulk sodium carbonate tank 160 tons capacity with vent filter system(NOTE: Uncontrolled emissions are 1.7 lbs/hr. The filter system is 99.9 % efficient, so 1.7 lbs/hr X 0.001 X 8760 hrs/yr / 2000 lbs/ton = 0.01 tons/yr).

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:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
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 of federally enforceable 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. The written 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.) See B.6 below if no deviations occurred during the quarter.
  - 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 3745-77-08.

- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

## **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 April 30th 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 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio

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

## **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.)

## **17. Compliance Method Requirements**

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

defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

## **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 of state-only enforceable 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 state-only required 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. 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).

### **4. 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.

### **5. 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.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

**None**

### **B. State Only Enforceable Section**

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

B003 - 4.2 mmBtu/hr, natural gas-fired boiler - summer boiler  
Z001 - Piling grounds  
P005 - North lime kiln  
P006 - South lime kiln

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:** #3 Gas Boiler (B004)

**Activity Description:** Boiler #3, 200 mmBTU/hr input oil with natural gas standby

#### 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>
200 mmBtu/hr #6 fuel oil-fired boiler w/ natural gas as standby	OAC rule 3745-18-78 (G)(1)	1.1 pounds sulfur dioxide (SO <sub>2</sub> )/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.16 pound PE/mmBtu of actual heat input (when burning only #6 fuel oil)
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input (when burning only natural gas)
	OAC rule 3745-31-05 (PTI #03-1490)	See A.I.2.a and b.

##### 2. Additional Terms and Conditions

- 2.a Sulfur dioxide (SO<sub>2</sub>) emissions from this emissions unit shall not exceed 107 tons/year, based upon a rolling, 12-month period.
- 2.b Nitrogen oxides (NO<sub>x</sub>) emissions from this emissions unit shall not exceed 106 tons/year, based upon a rolling, 12-month period.

##### II. Operational Restrictions

1. Fuel oil consumption from this emissions unit shall not exceed the following:
  - a. for #6 fuel oil containing 0.5% or less sulfur (by weight): 2,726,000 gallons/year, based upon a rolling, 12-month period; and
  - b. for #6 fuel oil containing greater than 0.5%, but less than or equal to 1.0% sulfur (by weight): 1,363,000 gallons/year, based upon a rolling, 12-month period.
2. The quality of oil burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.1 lbs/mmBtu of actual heat input.

## II. Operational Restrictions (continued)

3. The #6 fuel oil employed in this emissions unit shall contain no more than 1.0% sulfur (by weight).

## III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

2. The permittee shall maintain and record the following information each month for this emissions unit:
  - a. the number of gallons of #6 fuel oil, which contain 0.5% or less sulfur (by weight), consumed;
  - b. the number of gallons of #6 fuel oil, which contain greater than 0.5%, but less than or equal 1% sulfur (by weight), consumed;
  - c. the rolling, 12-month summation of the number of gallons of #6 fuel oil, which contain 0.5% or less sulfur (by weight), consumed ;
  - d. the rolling, 12-month summation of the number of gallons of #6 fuel oil, which contain greater than 0.5%, but less than or equal 1% sulfur (by weight), consumed;
  - e. the natural gas usage, in mm cu. ft.;
  - f. the rolling, 12-month summation of the natural gas usage, in mm cu. ft.;
  - g. the rolling, 12-month summation of SO<sub>2</sub> emissions, in tons, calculated as follows:

SO<sub>2</sub> emissions (tons/rolling, 12-month period) = [0.6\* X natural gas consumption (from section A.III.3.f above) + 157S\*\* X #6 fuel oil consumption (from section A.III.3.c above) + 157S\*\* X #6 fuel oil consumption (from section A.III.3.d above)]/2000

where:

\* AP-42, Section 1.4-6, Table 1.4-2 (revised 7/98) emission factor for the burning of natural gas (lbs SO<sub>2</sub>/mm cu. ft. of natural gas combusted)

\*\* AP-42, Section 1.3-11, Table 1.3-1 (revised 9/98) emission factor for the burning of #6 fuel oil (lbs SO<sub>2</sub>/1000 gallons of oil burned) and S is the weight % of sulfur in the oil;

- h. the rolling, 12-month summation of NO<sub>x</sub> emissions, in tons, calculated as follows:

NO<sub>x</sub> emissions (tons/rolling, 12-month period) = [170\* X natural gas consumption (from Section A.III.3.f above) + 32\*\* X #6 fuel oil consumption (from Section A.III.3.c above) + 32\*\* X #6 fuel oil consumption (from Section A.III.3.d above)]/2000

where:

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

\* AP-42, Section 1.4-5, Table 1.4-1 (revised 2/98) emission factor for the burning of natural gas (lbs NO<sub>x</sub>/mm cu. ft of natural gas combusted)

\*\* AP-42, Section 1.3-11, Table 1.3-1 (revised 9/98) emission factor for the burning of #6 fuel oil (lbs NO<sub>x</sub>/1000 gallons of oil burned).

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit when burning #6 fuel oil. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which summarize all exceedances of the following:
  - a. the rolling, 12-month summation of the number of gallons of #6 fuel oil usage restrictions of 2,726,000 and 1,363,000;
  - b. the rolling, 12-month summation of the SO<sub>2</sub> emission limitation of 107 tons; and
  - c. the rolling, 12-month summation of the NO<sub>x</sub> emission limitation of 106 tons.
2. The permittee shall notify the NWDO in writing of any record which shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1 based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the NWDO within 45 days after the deviation occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, NWDO) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall notify the Director (the Ohio EPA, NWDO) in writing of any record which shows a deviation of the limitation of 1.0% sulfur (by weight) in the #6 fuel oil. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, NWDO) within 45 days after the deviation occurs.

### V. Testing Requirements

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

## V. Testing Requirements (continued)

- 1.a** Emissions Limitations:  
1.1 lbs SO<sub>2</sub>/mmBtu of actual heat input  
107 tons SO<sub>2</sub>/rolling, 12-month period

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emission limitation of 1.1 lbs/mmBtu shall be demonstrated based upon the recordkeeping requirements in Section A.III of this permit and the applicable equation in OAC rule 3745-18-04(F).

Compliance with the annual SO<sub>2</sub> limitation shall be based upon the recordkeeping requirements in Section A.III of this permit.

If required, the permittee shall demonstrate compliance with the 1.1 lbs SO<sub>2</sub>/mmBtu emission limitation in accordance with Method 6 of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitation:  
106 tons NO<sub>x</sub>/rolling, 12-month period

Applicable Compliance Method:

Compliance with the NO<sub>x</sub> emission limitation above shall be based upon the recordkeeping requirements in Section A.III of this permit.

- 1.c** Emission Limitations:  
0.02 lb PE/mmBtu (for natural gas)  
0.16 lb PE/mmBtu (for #6 fuel oil)

Applicable Compliance Method:

When firing natural gas, the permittee shall demonstrate compliance by multiplying AP-42, Section 1.4-6, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs PE (filterable)/mm cu. ft by the emissions unit's maximum hourly fuel consumption rate (79,412 cu. ft./hr) and dividing by the emissions unit's maximum heat input capacity (200 mmBtu/hr)

When firing # 6 fuel oil, the permittee shall demonstrate compliance by multiplying AP-42, Section 1.3-11, Table 1.3-1 (revised 9/98) emission factor of  $(9.9S + 3.22)$  lbs PE (filterable)/1,000 gallons of oil combusted by the emissions unit's maximum hourly fuel consumption rate (540 gallons/hr) and dividing by the emissions unit's maximum heat input capacity (200 mmBtu/hr)

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(9).

\* S is the weight percent of sulfur in the fuel oil. For example, if the fuel oil contains 1% sulfur, then  $S = 1$ .

- 1.d** Usage Restrictions:  
2, 726,000 gallons #6 oil/rolling, 12-month period [when using oil containing 0.5% or less sulfur (by weight)]  
1, 363,000 gallons #6 oil/rolling, 12-month period [when using oil containing greater than 0.5%, but less than or equal to 1% sulfur (by weight) ]

Applicable Compliance Method:

Compliance with the #6 fuel oil usage restrictions above shall be based upon the recordkeeping requirements in Section A.III of this permit.

- 1.e** Sulfur Content Restriction:  
a maximum of 1% sulfur (by weight) in the #6 fuel oil

Applicable Compliance Method:

Compliance with the limitation above shall be based upon the recordkeeping requirements in Section A.III of this permit.

Facility Name: **Great Lakes Sugar Company**

Facility ID: **03-72-03-0103**

Emissions Unit: **#3 Gas Boiler (B004)**

## **VI. Miscellaneous Requirements**

**None**

**B. State 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>
200 mmBtu/hr #6 fuel oil-fired boiler w/ natural gas as standby	OAC rule 3745-31-05 PTI #03-1490	0.131 lb PE/mmBtu of actual heat input  27 tons PE per year

**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

1. Emission Limitation:  
0.131 lb PE/mmBtu  
27 TPY PE

### Applicable Compliance Method:

When firing natural gas, the permittee shall demonstrate compliance by multiplying AP-42, Section 1.4-6, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs PE (filterable)/mm cu. ft by the emissions unit's maximum hourly fuel consumption rate (79,412 cu. ft./hr) and dividing by the emissions unit's maximum heat input capacity (200 mmBtu/hr)

When firing # 6 fuel oil, the permittee shall demonstrate compliance by multiplying AP-42, Section 1.3-11, Table 1.3-1 (revised 9/98) emission factor of  $(9.9S + 3.22)$  lbs PE (filterable)/1,000 gallons of oil combusted by the emissions unit's maximum hourly fuel consumption rate (540 gallons/hr) and dividing by the emissions unit's maximum heat input capacity (200 mmBtu/hr)

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(9).

\* S is the weight percent of sulfur in the fuel oil. For example, if fuel oil is 1% sulfur, then  $S = 1$ .

Compliance with the annual PE emission limitation shall be based upon the following equation:

$$\text{PE (tons/year)} = [1.9 \times \text{actual annual natural gas consumption (from section A.III of this permit)} + (9.9S + 3.22) \times \text{actual annual number of gallons of \#6 fuel oil combusted (from section A.III.3.c of this permit)} + (9.9S + 3.22) \times \text{actual annual number of gallons of \#6 fuel oil combusted (from section A.III.3.d of this permit)}] / 2000$$

## VI. Miscellaneous Requirements

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** #1 Coal Boiler (B005)

**Activity Description:** Boiler #1, 104mmBTU/hr coal boiler w/multiclone and venturi scrubber

**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>
104 mmBtu/hr coal-fired boiler, w/ multiclone and venturi scrubber	OAC rule 3745-17-10(C)	0.20 pound particulate emissions (PE)/ mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-78 (G)	5.9 pounds sulfur dioxide (SO <sub>2</sub> )/mmBtu of actual heat input

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

- The pressure drop across the scrubber shall be continuously maintained at a value of not less than 7 inches of water at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of not less than 960 gallons per minute at all times while the emissions unit is in operation.
- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning. 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, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: 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 Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during a calendar month.
3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day while the emissions unit is in operation:

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber water flow rate, in gallons per minute.
- c. The downtimes for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

### V. Testing Requirements

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

## V. Testing Requirements (continued)

- 1.a** Emission Limitation -  
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method -

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b** Emission Limitation -  
0.20 lb PE/mmBtu of actual heat input

Applicable Compliance Method -

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.2 of this permit.

- 1.c** Emission Limitation -  
5.9 lbs SO<sub>2</sub>/mmBtu of actual heat input

Applicable Compliance Method -

Compliance with the SO<sub>2</sub> emission limitation shall be determined based upon the record keeping required in Section A.III of this permit and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation in accordance with the procedures and methods specified in OAC 3745-18-04(D)(1).

- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
  - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1-5 of 40 CFR Part 60, Appendix A.
  - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
- 3.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

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

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

Facility Name: **Great Lakes Sugar Company**

Facility ID: **03-72-03-0103**

Emissions Unit: **#1 Coal Boiler (B005)**

## **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>
104 mmBtu/hr coal-fired boiler, w/ multiclone and venturi scrubber	none	none

**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:** #2 Coal Boiler (B006)

**Activity Description:** Boiler #2, 104mmBTU/hr coal boiler w/multiclone and venturi scrubber

**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>
104 mmBtu/hr coal-fired boiler, w/ multiclone and venturi scrubber	OAC rule 3745-17-10(C)	0.20 pound particulate emissions (PE)/ mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-78 (G)	5.9 pounds sulfur dioxide (SO <sub>2</sub> )/mmBtu of actual heat input

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

- The pressure drop across the scrubber shall be continuously maintained at a value of not less than 7 inches of water at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of not less than 960 gallons per minute at all times while the emissions unit is in operation.
- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning. 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, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: 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 Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during a calendar month.
3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day while the emissions unit is in operation:

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber water flow rate, in gallons per minute.
- c. The downtimes for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

### V. Testing Requirements

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

## V. Testing Requirements (continued)

- 1.a** Emission Limitation -  
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method -

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b** Emission Limitation -  
0.20 lb PE/mmBtu of actual heat input

Applicable Compliance Method -

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.2 of this permit.

- 1.c** Emission Limitation:  
5.9 lbs SO<sub>2</sub>/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emission limitation shall be determined based upon the record keeping required in Section A.III of this permit and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation in accordance with the procedures and methods specified in OAC 3745-18-04(D)(1).

- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
  - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1-5 of 40 CFR Part 60, Appendix A.
  - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
- 3.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

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

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

Facility Name: **Great Lakes Sugar Company**

Facility ID: **03-72-03-0103**

Emissions Unit: **#2 Coal Boiler (B006)**

## **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>
104 mmBtu/hr coal-fired boiler, w/ multiclone and venturi scrubber	none	none

**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:** Pellet Mills/Cooler (P001)

**Activity Description:** Pellet mills and pellet cooler multiclone (NOTE: Source controlled pollutant emissions rate is 1.04 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78, 1.04 lbs/hr X 8760 hrs/yr / 2000 lbs/ton =4.56 tons/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>
pellet mills and pellet cooler multiclone	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	8.8 lbs PE/hr

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

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

## V. Testing Requirements

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

1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

1.b Emission limitation:  
8.8 lbs PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.2 of this permit.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

b. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1-5 of 40 CFR Part 60, Appendix A.

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

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

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

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

## 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>
pellet mills and pellet cooler multiclone	none	none

**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:** Boiler Ash System (P002)

**Activity Description:** 8" Steamatic exhauster, w/cyclone and settling chamber ash blowing system (NOTE: Source emissions rate is 2.8 lbs/hr but the exhaust for P002 is vent to a venturi scrubber which is 80% efficient for particulate, therefor the actual emissions is  $(2.8 \text{ lbs/hr} \times 0.2 = 0.56 \text{ lbs/hr})$  and  $0.56 \text{ lbs/hr} \times 8760 \text{ hrs/yr} / 2000 \text{ lbs/ton} = 2.45 \text{ tons/year}$ )

#### 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>
boiler ash system, with cyclone, settling chamber, and venturi scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	See A.I.2.a.

##### 2. Additional Terms and Conditions

- 2.a PE from this emissions unit shall be less than 10 lbs/hr\*.

\*The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. Therefore, to ensure that Figure II will not be applicable, the permittee has agreed to accept a PE limitation of less than 10 lbs/hr.

##### II. Operational Restrictions

- The pressure drop across the scrubber shall be continuously maintained at a value of not less than 7 inches of water at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of not less than 960 gallons per minute at all times while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day while the emissions unit is in operation:

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber water flow rate, in gallons per minute.
- c. The downtimes for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate.

### V. Testing Requirements

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

- 1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:  
less than 10.0 lbs PE/hr

Applicable Compliance Method:

Compliance with the emission limitation above shall be determined by multiplying the uncontrolled rate PE of 2.8 lbs/hr\* by a control factor of 0.2.\*\*

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

\* This estimate is based on the permittee's best engineering judgement.

\*\* Control efficiency of the venturi scrubber is 80%.

### 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>
boiler ash system, with cyclone, settling chamber and venturi scrubber	none	none

**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:** Pulp Drier (P003)

**Activity Description:** Direct fired rotary pulp drier, natural gas or # 6 fuel oil, w/multiclone collector and multiclone aspiration

#### 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>
natural gas and #6 fuel oil-fired rotary drum dryer, w/ multiclone	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	44.27 lbs PE/hr
	OAC rule 3745-18-06(E)	140.3 lbs sulfur dioxide (SO <sub>2</sub> )/hr

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable SO<sub>2</sub> emission limitation specified above.

##### III. Monitoring and/or Record Keeping Requirements

- For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

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

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit when burning #6 fuel oil. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit semi-annual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall notify the NWDO in writing of any record which shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1 based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the NWDO within 45 days after the deviation occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
44.27 lbs PE/hr  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.2 of this permit.
  - 1.b Emission Limitation:  
20% opacity, as a 6-minute average, except as provided by rule  
  
Applicable Compliance Method:  
Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - 1.c Emission Limitation:  
140.3 lbs SO<sub>2</sub>/hr  
  
Applicable Compliance Method:  
Compliance with the SO<sub>2</sub> emission limitation above shall be demonstrated based upon the recordkeeping requirements in Section A.III of this permit and the applicable equation in OAC rule 3745-18-04(F).  
  
If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation in accordance with Method 6 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - b. The emission testing shall be conducted within 6 months prior to permit renewal.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1-5 of 40 CFR Part 60, Appendix A.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

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

## VI. Miscellaneous Requirements

**None**

**B. State 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>
natural gas and #6 fuel oil-fired rotary drum dryer, w/ multiclone	none	none

**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:** Pulp/Pellet Conveying Equipment (P004)

**Activity Description:** Scrolls, elevators, and conveying equipment w/multiclone collector for dried pulp and pellets (NOTE:Source controlled pollutant emissions rate is 1.83 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. The equipment operates less than 225 days/yr due to the fact that sugar beets are only available during this time, 1.83 lbs/hr X 24 hrs/day X 225

**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>
pellet mills and pellet cooler multiclone	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	14 lbs PE/hr

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

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

**IV. Reporting Requirements**

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

## V. Testing Requirements

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

1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

1.b Emission limitation:  
14 lbs PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.2 of this permit.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

b. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1-5 of 40 CFR Part 60, Appendix A.

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

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

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

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

## VI. Miscellaneous Requirements

**None**

**B. State 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>
pellet mills and pellet cooler multiclone	none	none

**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:** Lime Crusher, Hopper, and Elevator (P007)

**Activity Description:** Lime crusher, hopper, and elevator w/multiclone collector (NOTE:Source controlled pollutant emissions rate is 1.9 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. The equipment operates less than 219 days/yr due to the fact that sugar beets are only available during this time. 1.9 lbs/hr X 24 hrs/day X 219 days / 2000 lbs/ton = 4.99 tons/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>
lime crusher, hopper, and elevator w/multiclone collector	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	See A.I.2.a.

**2. Additional Terms and Conditions**

- 2.a PE from this emissions unit shall be less than 10 lbs/hr\*.

\*The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. Therefore, to ensure that Figure II will not be applicable, the permittee has agreed to accept a PE limitation of less than 10 lbs/hr.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

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

#### **IV. Reporting Requirements**

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:  
10.0 lbs PE/hr

Applicable compliance method:

The permittee shall demonstrate compliance with the above emission limitation by multiplying an emission factor of 0.238 lb PE/ton\* of product by the maximum process weight rate (8 tons/hr).

\* This emission factor was derived based on the results of emission testing conducted on this emissions unit.

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

#### **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>
lime crusher, hopper, and elevator w/multiclone collector	none	none

**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:** Top Granulator (P008)

**Activity Description:** Top granulator rotary sugar dryer w/wet collector (NOTE:Source controlled pollutant emissions rate is 0.27 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. 0.27 lbs/ hr X 8760 hrs/yr / 2000 lbs/ton = 1.18 tons/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>
top granulator rotary sugar dryer w/ scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule. See A.I.2.a.
	OAC rule 3745-17-11(B)	

**2. Additional Terms and Conditions**

- 2.a PE from this emissions unit shall be less than 10 lbs/hr\*.

\*The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. Therefore, to ensure that Figure II will not be applicable, the permittee has agreed to accept a PE limitation of less than 10 lbs/hr.

**II. Operational Restrictions**

1. The pH of the scrubber liquor shall be maintained at 7.2 at all times while the emissions unit is in operation.
2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.
3. The scrubber water flow rate shall be continuously maintained at a value of not less than 66 gallons per minute at all times while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day while the emissions unit is in operation:

- a. The pH of the scrubber liquor, on a once/shift basis.
  - b. A log or record of downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information when the emissions unit is in operation:

- a. The pressure drop across the scrubber, in inches of water, on a once/shift basis.
- b. The scrubber water flow rate, in gallons per minute, on a once/shift basis.
- c. The downtimes for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified in Section A.III.1 of this permit.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
10.0 lbs PE/hr

Applicable compliance method:

The permittee shall demonstrate compliance with the above emission limitation by multiplying an emission factor of 0.00047 lb PE/cwt\* of product by the maximum process weight rate (575 cwt/hr).

\* This emission factor was derived based on the results of emission testing conducted on this emissions unit.

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

**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>
top granulator rotary sugar dryer w/ scrubber	none	none

**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:** Bottom Granulator (P009)

**Activity Description:** Bottom granulator rotary sugar dryer w/wet collector (NOTE:Source controlled pollutant emissions rate is 0.27 lbs/hr based on stack test dated 11/24/78 and submitted to Ohio-EPA on 12/15/78. 0.27 lbs/ hr X 8760 hrs/yr / 2000 lbs/ton = 1.18 tons/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>
bottom granulator rotary sugar dryer w/ scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule. See A.I.2.a.
	OAC rule 3745-17-11(B)	

**2. Additional Terms and Conditions**

- 2.a PE from this emissions unit shall be less than 10 lbs/hr\*.

\*The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. Therefore, to ensure that Figure II will not be applicable, the permittee has agreed to accept a PE limitation of less than 10 lbs/hr.

**II. Operational Restrictions**

1. The pH of the scrubber liquor shall be maintained at 7.2 at all times while the emissions unit is in operation.
2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.
3. The scrubber water flow rate shall be continuously maintained at a value of not less than 66 gallons per minute at all times while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day while the emissions unit is in operation:

- a. The pH of the scrubber liquor, on a once/shift basis.
  - b. A log or record of downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information when the emissions unit is in operation:

- a. The pressure drop across the scrubber, in inches of water, on a once/shift basis.
- b. The scrubber water flow rate, in gallons per minute, on a once/shift basis.
- c. The downtimes for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified in Section A.III.1 of this permit.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Facility Name: **Great Lakes Sugar Company**

Facility ID: **03-72-03-0103**

Emissions Unit: **Bottom Granulator (P009)**

## **V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
10.0 lbs PE/hr

Applicable compliance method:

The permittee shall demonstrate compliance with the above emission limitation by multiplying an emission factor of 0.00047 lb PE/cwt\* of product by the maximum process weight rate (575 cwt/hr).

\* This emission factor was derived based on the results of emission testing conducted on this emissions unit.

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

## **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>
bottom granulator rotary sugar dryer w/ scrubber	none	none

**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:** # 1 Sodium Carbonate Tank (P010)

**Activity Description:** # 1 bulk sodium carbonate tank 50 tons capacity with vent filter system (NOTE:Uncontrolled emissions are 1.7 lbs/hr. The filter system is 99.9 % efficient, so 1.7 lbs/hr X 0.001 X 8760 hrs/yr / 2000 lbs/ton = 0.01 tons/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>
# 1 bulk sodium carbonate tank, with vent filter system	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule. See A.I.2.a.
	OAC rule 3745-17-11(B)	

##### 2. Additional Terms and Conditions

- 2.a PE from this emissions unit shall be less than 10 lbs/hr\*.

\*The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. Therefore, to ensure that Figure II will not be applicable, the permittee has agreed to accept a PE limitation of less than 10 lbs/hr.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

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

#### **IV. Reporting Requirements**

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:  
10.0 lbs PE/hr

Compliance with the emission limitation above shall be determined by multiplying the uncontrolled PE rate of 1.7 lbs/hr\* by a control factor of 0.001\*\*.

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

\* This is based on the permittee's best engineering judgement.

\*\* Control efficiency of the baghouse is 99.9%.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
# 1 bulk sodium carbonate tank with vent filter system	none	none

**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:** # 2 Sodium Carbonate Tank (P011)

**Activity Description:** # 2 bulk sodium carbonate tank 160 tons capacity with vent filter system(NOTE: Uncontrolled emissions are 1.7 lbs/hr. The filter system is 99.9 % efficient, so 1.7 lbs/hr X 0.001 X 8760 hrs/yr / 2000 lbs/ton = 0.01 tons/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>
# 2 bulk sodium carbonate tank, with vent filter system	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule. See A.I.2.a.
	OAC rule 3745-17-11(B)	

##### 2. Additional Terms and Conditions

- 2.a PE from this emissions unit shall be less than 10 lbs/hr\*.

\*The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. Therefore, to ensure that Figure II will not be applicable, the permittee has agreed to accept a PE limitation of less than 10 lbs/hr.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

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

#### **IV. Reporting Requirements**

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:  
20 percent opacity, as a 6-minute average, except as otherwise provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:  
10.0 lbs PE/hr

Compliance with the emission limitation above shall be determined by multiplying the uncontrolled PE rate of 1.7 lbs/hr\* by a control factor of 0.001\*\*.

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

\* This is based on the permittee's best engineering judgement.

\*\* Control efficiency of the baghouse is 99.9%.

#### **VI. Miscellaneous Requirements**

**None**

**B. State 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>
# 2 bulk sodium carbonate tank with vent filter system	none	none

**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

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