



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

6/27/2011

Mr. Mark Borer  
POET Biorefining - Leipsic  
3875 State Route 65  
Leipsic, OH 45856

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0369000051  
Permit Number: P0107812  
Permit Type: OAC Chapter 3745-31 Modification  
County: Putnam

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
POET Biorefining - Leipsic**

Facility ID:	0369000051
Permit Number:	P0107812
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	6/27/2011
Effective:	6/27/2011
Expiration:	6/22/2014



**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
POET Biorefining - Leipsic

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## Authorization

Facility ID: 0369000051

Application Number(s): A0040957, A0041866, A0041868

Permit Number: P0107812

Permit Description: Modification to allow for an increase in production of a fuel ethanol production facility. Ethanol production would increase from 69 to 79 million gallons per year through changes associated with a process optimization project. The use of a flare, scrubber, regenerative thermal oxidizer, baghouses, and internal floating roofs will be employed for control of air contaminant emissions.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$11,000.00

Issue Date: 6/27/2011

Effective Date: 6/27/2011

Expiration Date: 6/22/2014

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

POET Biorefining - Leipsic  
3875 State Route 65  
Leipsic, OH 45856

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

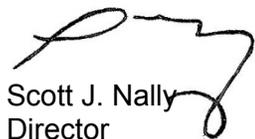
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0107812

Permit Description: Modification to allow for an increase in production of a fuel ethanol production facility. Ethanol production would increase from 69 to 79 million gallons per year through changes associated with a process optimization project. The use of a flare, scrubber, regenerative thermal oxidizer, baghouses, and internal floating roofs will be employed for control of air contaminant emissions.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	Paved roadways
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	ethanol loading
Superseded Permit Number:	P0105657
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	ethanol production
Superseded Permit Number:	P0105657
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	dryer no. 1
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	dryer no. 2
Superseded Permit Number:	P0105657
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	DDGS storage
Superseded Permit Number:	P0105657
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	grain receiving
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P902</b>
Company Equipment ID:	DDCS loadout
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T001</b>
Company Equipment ID:	190 ethanol tank
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b>	<b>T002</b>
Company Equipment ID:	denaturant tank
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T003</b>
Company Equipment ID:	200 ethanol tank
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T004</b>
Company Equipment ID:	200 ethanol tank
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T005</b>
Company Equipment ID:	denaturant tank
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable

**Group Name: Hammermills P002-P006**

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	hammermill no. 1
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	hammermill no. 2
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	hammermill no. 3
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	hammermill no. 4
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	hammermill no. 5
Superseded Permit Number:	P0106634
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**

**Final Permit-to-Install and Operate**

POET Biorefining - Leipsic

**Permit Number:** P0107812

**Facility ID:** 0369000051

**Effective Date:** 6/27/2011

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

## **C. Emissions Unit Terms and Conditions**

**1. F001, Paved roadways**

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

Paved roadways and parking areas

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)b.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	0.73 tons of fugitive particulate matter of 10 microns or less in size (PM10)/yr  No visible particulate (PE) except for a period of time not to exceed one minute during any 60-minute observation period  Best available control measures that are sufficient enough to minimize or eliminate visible emissions of fugitive dust [See b)(2)b. through b)(2)d.]  See b)(2)a.
b.	OAC rule 3745-31-05 (A)(3)(a)(ii), as effective 12/1/06	See b)(2)e.
	OAC rule 3745-17-07(B)	See b)(2)f.
	OAC rule 3745-17-08(B)	See B)(2)g.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until a SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

Paved Roadways and Parking Areas

all paved roadways and parking areas

- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to sweeping paved roadways and parking areas. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for the day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM10 emissions from this air contaminant source since the calculated potential to emit (PTE) is less than 10 tons per year

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as

total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- g. This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>Paved Roadways and Parking Areas</u>	<u>Minimum Inspection Frequency</u>
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all paved roadways and parking areas    once during each day of operation

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (3) The permittee shall maintain records of the following information:
  - a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation.
  - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures.
  - c. The dates the control measures were implemented.
  - d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The

permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(3) above:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

The above information shall be provided as an attachment to the PER. If there were no days and/or instances to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency, and control measures were properly implemented.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
0.73 tons of fugitive PM10/yr

Applicable Compliance Method:

The PM10 limitation was determined by multiplying an AP-42 emission factor for paved roadways of 0.03 lb of PM10/VMT [Section 13.2.1 (1/11)] by a maximum of 48,999 vehicle miles traveled per year and dividing by 2000 lbs/ton.

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PM10 limitation will be demonstrated.

- b. Emission Limitation:  
No visible PE except for a period of time not to exceed one minute during any 60-minute observation period

Applicable Compliance Method:

Compliance with the visible emissions limitation for fugitive dust from the paved roadways and/or parking areas identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.

**2. J001, ethanol loading**

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

ethanol and gasoline loading operations

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)c., b)(1)e., and d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	4.44 tons volatile organic compounds (VOC)/yr  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	1.35 tons nitrogen oxides (NOx)/yr  3.39 tons carbon monoxide (CO)/yr  See b)(2)b.
c.	OAC rule 3745-31-05 (A)(3)(a)(ii), as effective 12/1/06	See b)(2)c.
d.	OAC rule 3745-21-07(M)(2)	See b)(2)d.
e.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(3).

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:

i. 4.44 tons VOC/year

b. The following requirements contained in this permit satisfy the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:

i. compliance with the following limitations:

(a) 1.35 tons NOX/yr

(b) 3.39 tons CO/yr

ii. compliance with the following regulations:

(a) OAC rule 3745-31-05(F)

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the NOx and CO emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO is less than 10 tons per year.

d. This emissions unit is exempt from the requirements specified in OAC rule 3745-27-07(M)(2) pursuant to OAC rule 3745-21-07(M)(3)(c)(iii).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE: [See b)(2)a.):
  - a. a flare system shall be used whenever this air contaminant source is in operation with a minimum control efficiency of 98%, by weight for VOC.
- (2) The permittee shall comply with the following restrictions on the flare controlling this emissions unit:
  - a. the closed vent system shall be operated at all times when emissions may be vented to it;
  - b. the flare shall be operated with a pilot flame . The pilot flame shall be present at all times the ethanol loading system is in operation and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame;
  - c. the net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be 300 Btu/scf or greater;
  - d. the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than 60 feet per second; and,
  - e. the permittee shall ensure the flare is operated and maintained in conformance with its design.
- (3) The maximum annual ethanol throughput rate for this emissions unit shall not exceed 79 million gallons (includes up to 10,000,000 gallons of E85).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall comply with the following monitoring and record keeping requirements on the flare controlling this emissions unit:

- a. the flare shall be monitored with a thermocouple or any other equivalent device to detect the presence of a pilot flame;
- b. the permittee shall maintain and operate a pressure switch which activates the vapor line valve, which controls flow to the flare;
- c. the permittee shall maintain records of the following:



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If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of any of the following requirements for the flare:
- a. all monitored parameters (i.e., thermocouple or equivalent device and vent stream flow indicator);
  - b. periods of time when the closed vent system stream is diverted from system control devices;
  - c. all periods of time when the flare was not operational, including all periods of time during which the pilot flame on the flare is not functioning properly; and
  - d. all periods of time when required monitoring data was not collected.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation : 4.44 tons VOC/year

Applicable Compliance Method: The annual limitation represents the potential to emit for this emissions unit. The PTE for VOC for this emissions unit was determined by combining the calculated emissions from loading denatured ethanol and E85. The emissions were calculated by multiplying an emission factor of 5.47 lbs VOC/1000 gallons of denatured ethanol and 5.71 lbs VOC/1000 gallons of E85 [as determined through the methodology in AP-42, section 5.2.2 (1/95) in conjunction with the information submitted by the permittee in the PTIO application by the maximum annual throughput of 79 million gallons of denatured ethanol, including up to 10 million gallons of E85, and by a control factor of (1-0.98\*), and then dividing by 2000 pounds/ton.

\* the control efficiency for the flare is assumed to be a minimum of 98%.

- b. Emission Limitation : CO emissions shall not exceed 3.39 tpy.

Applicable Compliance Method: The annual limitation represents the potential to emit for this emissions unit. The PTE was calculated by multiplying the manufacturer's guaranteed emission rate of 0.084 lb CO per 1000 gallons by the maximum annual throughput of 79 million gallons and then dividing by 2000 pounds/ton.

- c. Emission Limitation :NOx emissions shall not exceed 1.35 tpy.

Applicable Compliance Method: The annual limitation represents the potential to emit for this emissions unit. The PTE was calculated by multiplying the manufacturer's guaranteed emission rate of 0.0334 lbNOx per 1000 gallons by the maximum annual throughput of 79 million gallons and then dividing by 2000 pounds/ton.

g) Miscellaneous Requirements

- (1) If required, compliance with the net heating value of the gas being combusted in the flare (shall be 300 BTU/SCF or greater) shall be determined by the method specified in Paragraph (P)(2) of OAC rule 3745-21-10.
- (2) If required, compliance with the designed and operated actual exit velocity of the flare (shall be less than 60 feet per second) shall be determined by the method specified in Paragraph (P)(3) of OAC rule 3745-21-10.

**3. P007, ethanol production**

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

ethanol production operations (mash and slurry tanks, fermenters, beer well, distillation column, stripper, rectifier and evaporator)

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)h., and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	<p><b><u>Emission limits during normal operation:</u></b></p> <p>Carbon monoxide (CO) emissions from P007, P008, P009 and P010 combined, shall not exceed 10.5 lbs/hr and 45.9 TPY [see b)(2)a and c)(1)].</p> <p>Particulate matter equal to or less than 10 microns in size (PM10), from emissions units P007, P008, P009 and P010 combined, shall not exceed 10.0 lbs/hr and 43.8 TPY [see b)(2)a., b)(2)c. and C)(1)]</p> <p>Volatile organic compound (VOC) emissions from P007, P008, P009 and P010 combined, shall not exceed 10.3</p>

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		<p>lbs/hr and 45.3 TPY. [see b)(2)a and c)(1)]</p> <p><b><u>Emission limits during downtime of the RTO</u></b></p> <p>During downtime of the RTO, emissions unit P007 shall be the only emissions unit exhausted to the fermentation scrubber.</p> <p>VOC emissions shall not exceed 20.0 lbs/hr and 5.0 TPY [see b)(2)a., b)(2)d. and c)(1)].</p> <p>Visible particulate emissions (PE) from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average during normal and RTO downtime operations.</p>
b.	ORC rule 3704.03(T)	<p>Nitrogen oxides (NOx) emissions from emissions units P007, P008, P009 and P010 combined shall not exceed 11.0 pounds per hour (lbs/hr).</p> <p>See b)(2)e.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)f.
d.	OAC rule 21-09(DD)	See the requirements for emissions unit P801
e.	40 CFR Part 60, Subpart VV	See the requirements for emissions unit P801
f.	OAC rule 3745-17-07(A)	See b)(2)g.
g.	OAC rule 3745-17-11(B)	See b)(2)g.
h.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(5).

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for CO, PM<sub>10</sub> and VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:

i. 10.5 lbs/hr and 45.9 tpy CO (for P007, P008 and P009 combined);

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- ii. 10.0 lbs/hr PM10 and 43.8 tpy PM10(for P007, P008 and P009 combined);
  - iii. visible PE shall not exceed 5% opacity, as a six-minute average (during normal operations and downtime of the RTO);
  - iv. 10.3 lbs/hr and 45.3 tpy VOC (during normal operations) (for P007, P008 and P009 combined); and
  - v. 20.0 lbs/hr and 5.0 tpy VOC (during downtime of the RTO)
- b. The annual allowable emission rate is based on the annual production of 79,000,000 gallons of denatured ethanol (including up to 10,000,000 gallons E85). Since the facility annual production rate is equivalent to the maximum facility capacity, no operational restrictions, monitoring, record keeping or reporting requirements are necessary to ensure that this emissions unit does not exceed its annual allowable emission rates. The requirement to record the amount of ethanol/E85 produced is in the terms and conditions of emissions unit J001.
- c. All emissions of particulate matter are PM10.
- d. When the RTO is shutdown for unscheduled maintenance\* or other operational reasons, while this emissions unit is in operation, this emissions unit shall be controlled by the fermentation scrubber. Down time of the RTO, while this emissions unit continues to operate, shall not exceed 500 hours per year and the permittee must also shut down emissions units P008 and P009 during the unscheduled downtime of the RTO.
- \*RTO shutdown for unscheduled maintenance is considered any maintenance, malfunction, etc. which the permittee does not address under the provisions of OAC rule 3745-15-06.
- e. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be a NOx emission limitation not to exceed 11.0 lbs/hr (for P007, P008 and P009 combined) and compliance with the lb/hr limitations established under OAC rule 3745-31-05(F).
- The emission rates above represent the potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design). Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.
- The emissions of sulfur dioxide (SO<sub>2</sub>) from this emissions unit have been determined to be negligible and therefore emission limitations under OAC rule 3745-31-05(A)(3), as effective 11-30-01, have not been established in this permit.
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE: [See b)(2)a.):
  - a. the use of a wet scrubber meeting a minimum control efficiency of 95% for VOC emissions;
  - b. the use of a regenerative thermal oxidizer (RTO) following the wet scrubber meeting a minimum control efficiency of 90% for CO and particulate matter\* and 98% for VOC emissions; and
  - c. firing only natural gas in the RTO.

\*The control of particulate matter includes a multiclone/cyclone for removal of PE (as dried product) prior to entering the RTO. The control system shall result in a PM10 emission rate not to exceed 10.0 lbs/hr from the RTO.
- (2) The unscheduled down time of the RTO, while this emissions unit continues to operate, shall not exceed 500 hours per calendar year.
- (3) The permittee shall shut down emissions units P008 and P009 when the RTO experiences an unscheduled shutdown.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the

personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber, in inches of water, and the scrubber water flow rate, in gallons per minute during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the scrubber and the scrubber water flow rate, in gallons per minute, on a once per shift basis.

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

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

The pressure drop across the scrubber shall be maintained in accordance with the manufacturer's specifications. The scrubber water flow rate shall be no less the value established during the most recent emission testing that demonstrated the emissions unit was in compliance (until such time that such value is established, the scrubber water flow rate shall be maintained in accordance with the manufacturer's specifications).

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

- (3) For each time period during which emissions units P008 and/or P009 were in operation when the RTO was shut down [see b)(2)d. and c)(2)], the permittee shall maintain a record of the number of hours emissions unit P008 and/or P009 were in operation during that time period. Also, the permittee shall maintain a record of all instances when emissions unit P008 and/or P009 were in operation when the RTO was shut down.
- (4) The permittee shall maintain monthly records of the number of hours the RTO was shutdown while this emissions unit remained in operation [see b)(2)d. and c)(2)] (in hours per month and total hours, to date for the calendar year).
- (5) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the proposed combined increase for each toxic air contaminant (as defined in OAC rule 3745-114-01) from emission units J001, P007, P008, P009, and P010 will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit deviation reports that identify all instances when emissions units P008 and/or P009 were in operation [see b)(2)d. and c)(3)] when the RTO was shut down. These reports shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. For the thermal incinerator:
    - i. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was

in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

- ii. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- iii. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken;
- iv. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action; and
- v. any exceedance of the annual hours of operation when the emissions units was operating during unscheduled downtime of the RTO.

b. For the scrubber:

- i. each period of time when the pressure drop across the scrubber was outside of the acceptable range;
- ii. each period of time when the scrubber water flow rate deviated from the acceptable value;
- iii. an identification of each incident of deviation described in (a) and/or (b) where prompt corrective action, that would bring the pressure drop and/or water flow rate into compliance with the acceptable range/value, was determined to be necessary and was not taken; and
- iv. an identification of each incident of deviation described in (a) and/or (b) where proper records were not maintained for the investigation and/or the corrective action.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 180 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than one year after issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the NO<sub>x</sub>, CO, VOC, and PM<sub>10</sub> mass emission limitations from the regenerative thermal oxidizer controlling this emissions unit. Emission testing shall also be conducted to demonstrate compliance with the control efficiency limitation for VOCs from the scrubber controlling this emissions unit, and for the control efficiency limitation for VOCs from the regenerative thermal oxidizer controlling this emissions unit. Emission testing shall also be conducted to verify the expected emissions for single and combined HAPs.
  - c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
    - i. for PM<sub>10</sub>, Methods 201/201A and 202 of 40 CFR Part 51, Appendix M;
    - ii. for NO<sub>x</sub>, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
    - iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and
    - iv. for total VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A for determining total VOC mass emissions; and
    - v. for HAPs (acetaldehyde, hexane, formaldehyde, acrolein, toluene, xylenes), Methods 18 or 320 from 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.
  - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A for VOC emissions .
  - e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
  - f. The test(s) shall be conducted while emissions units P007, P008 and P009 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, NWDO.

- g. During emission testing, the permittee shall also record the following information:
  - i. the pressure drop across the scrubber, in inches of water;
  - ii. the scrubber water flow rate, in gallons/minute; and
  - iii. the average combustion temperature within the thermal incinerator, in degrees Fahrenheit.
- h. 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, NWDO. 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, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO 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, NWDO.

Future testing requirements shall be conducted in accordance with applicable rules, policies, etc. (i.e. Engineering Guide #16, OAC rule 3745-15-04, etc.) Testing time frames may be amended or waived for cause upon prior request of and written approval of, the Ohio EPA Northwest District Office.

- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

10.34 lb VOC/hr, 45.3 tpy VOC (for emissions units P007, P008 and P009 combined)

11.0 lbsNOx/hr (for emissions units P007, P008 and P009 combined)

10.5 lbs CO/hr, 45.9 tpy CO (for emissions units P007, P008 and P009 combined)

10.0 lbs PM10/hr, 43.8 tpy PM10 (for emissions units P007, P008 and P009 combined)

Applicable Compliance Method:

Compliance with the hourly allowable emission limitations above shall be demonstrated based on the results of emission testing conducted in accordance with the following:

- i. for PM10, Methods 201/201(A) and 202 of 40 CFR Part 51, Appendix M;
- ii. for NOx, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
- iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and
- iv. for total VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A.

The annual emission limitations were developed by multiplying the respective hourly emission limitations by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitations, compliance with the annual limitations shall also be demonstrated.

b. Emission Limitation:

Visible PE from the RTO stack shall not exceed 5% opacity, as a six-minute average (during normal operations and RTO downtime).

Appliance Compliance Method:

If required compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

c. Emission Limitation:

The scrubber shall meet a minimum control efficiency of 95% for VOC emissions.

The regenerative thermal oxidizer shall meet a minimum control efficiency of 98% for VOC emissions, and a minimum control efficiency of 90% for CO and PM10\*.

\*The control of particulate matter includes a multiclone/cyclone for removal of particulate matter (as dried product) prior to entering the RTO. The control system shall result in a PM10 emission rate not to exceed 10.0 lbs/hr from the RTO.

Applicable Compliance Method:

Compliance with the control efficiency requirements above shall be demonstrated based on the results of emission testing conducted in accordance with the methods outlined in Section f)(1) of this permit. Compliance with the CO destruction efficiency shall be assumed as long as compliance with the hourly CO mass emission limitation is maintained. [Due to the creation of CO in the

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RTO, it is not possible to perform testing to demonstrate compliance directly associated with the destruction of CO entering the RTO.

g) Miscellaneous Requirements

(1) None.

**4. P008, dryer no. 1**

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

dryer no. 1 (60 mmBtu/hr natural gas fired) controlled with a regenerative thermal oxidizer

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)f. and d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	Carbon monoxide (CO) emissions from P007, P008 and P009 combined, shall not exceed 10.5 lbs/hr and 45.9 TPY [see b)(2)a and c)(1)].  Particulate matter equal to or less than 10 microns in size (PM10), from emissions units P007, P008 and P009 combined, shall not exceed 10.0 lbs/hr and 43.8 TPY [see b)(2)a., b)(2)b. and C)(1)]  Volatile organic compound (VOC) emissions from P007, P008 and P009 combined, shall not exceed 10.34 lbs/hr and 45.3 TPY. [see b)(2)a and c)(1)]  Visible particulate emissions (PE) from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		minute average during normal and RTO downtime operations.
b.	ORC rule 3704.03(T)	Nitrogen oxides (NOx) emissions from emissions units P007, P008 and P009 combined shall not exceed 11.0 pounds per hour (lbs/hr).  See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)e.
f.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(4).

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for CO, PM<sub>10</sub> and VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:
- i. 10.5 lbs/hr and 45.9 tpy CO (for P007, P008 and P009 combined);
  - ii. 10.0 lbs/hr PM<sub>10</sub> and 43.8 tpy PM<sub>10</sub>(for P007, P008 and P009 combined);
  - iii. visible PE shall not exceed 5% opacity, as a six-minute average (during normal operations and downtime of the RTO);
  - iv. 10.3 lbs/hr and 45.3 tpy VOC (for P007, P008 and P009 combined).
- b. All emissions of particulate matter are PM<sub>10</sub>.
- c. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be a NOx emission limitation not to exceed 11.0 lbs/hr (for P007, P008 and P009 combined) and compliance with the lb/hr limitations established under OAC rule 3745-31-05(F).

The emission rates above represent the potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design). Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

- d. The emissions of sulfur dioxide (SO<sub>2</sub>) from this emissions unit have been determined to be negligible and therefore emission limitations under OAC rule 3745-31-05(A)(3), as effective 11-30-01, have not been established in this permit.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE: [See b)(2)a.):

- a. the use of a regenerative thermal oxidizer (RTO) following a wet scrubber meeting a minimum control efficiency of 90% for CO and particulate matter\* and 98% for VOC emissions; and
- b. firing only natural gas in the RTO.

\*The control of particulate matter includes a multiclone/cyclone for removal of particulate matter (as dried product) prior to entering the RTO. The control system shall result in a PM<sub>10</sub> emission rate not to exceed 10.0 lbs/hr (for P007, P008, P009 and P010 combined) from the RTO.

- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall shut down this emissions unit when the RTO experiences an unscheduled shutdown.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination

and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

- (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (3) The permittee shall maintain a record of all instances when this emissions unit was in operation when the RTO was shutdown.
- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the proposed combined increase for each toxic air contaminant (as defined in OAC rule 3745-114-01) from emission units J001, P007, P008, P009, and P010 will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit deviation reports that identify all instances when emissions units P008 and/or P009 were in operation [see b)(2)d. and c)(3)] when the RTO was shut down. These reports shall be submitted within 30 days after the deviation occurs.

- (3) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment (thermal incinerator) during the operation of this emissions unit:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) **Testing Requirements**

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 180 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than one year after issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the NO<sub>x</sub>, CO, VOC, and PM<sub>10</sub> mass emission limitations from the regenerative thermal oxidizer controlling this emissions unit. Emission testing shall also be conducted to demonstrate compliance with the control efficiency limitation for VOCs from the scrubber controlling this emissions unit, and for the control efficiency limitation for VOCs from the regenerative thermal oxidizer controlling this emissions unit. Emission testing shall also be conducted to verify the expected emissions for single and combined HAPs.

- c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
- i. for PM<sub>10</sub>, Methods 201/201A and 202 of 40 CFR Part 51, Appendix M;
  - ii. for NO<sub>x</sub>, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
  - iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and
  - iv. for total VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A for determining total VOC mass emissions; and
  - v. for HAPs (acetaldehyde, hexane, formaldehyde, acrolein, toluene, xylenes), Methods 18 or 320 from 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.

- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A for VOC emissions .
- e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
- f. The test(s) shall be conducted while emissions units P007, P008 and P009 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, NWDO.
- g. During emission testing, the permittee shall also record the following information:
- i. the average combustion temperature within the thermal incinerator, in degrees Fahrenheit.
- h. 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, NWDO. 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, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO 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, NWDO.

Future testing requirements shall be conducted in accordance with applicable rules, policies, etc. (i.e. Engineering Guide #16, OAC rule 3745-15-04, etc.) Testing time frames may be amended or waived for cause upon prior request of and written approval of, the Ohio EPA Northwest District Office.

- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

10.34 lb VOC/hr, 45.3 tpy VOC (for emissions units P007, P008 and P009 combined)

11.0 lbsNOx/hr (for emissions units P007, P008 and P009 combined)

10.5 lbs CO/hr, 45.9 tpy CO (for emissions units P007, P008 and P009 combined)

10.0 lbs PM10/hr, 43.8 tpy PM10 (for emissions units P007, P008 and P009 combined)

Applicable Compliance Method:

Compliance with the hourly allowable emission limitations above shall be demonstrated based on the results of emission testing conducted in accordance with the following:

- i. for PM10, Methods 201/201A and 202 of 40 CFR Part 51, Appendix M;
- ii. for NOx, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
- iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and
- iv. for total VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A.

The annual emission limitations were developed by multiplying the respective hourly emission limitations by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitations, compliance with the annual limitations shall also be demonstrated.

b. Emission Limitation:

Visible PE from the RTO stack shall not exceed 5% opacity, as a six-minute average (during normal operations and RTO downtime).

Appliance Compliance Method:

If required compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

c. Emission Limitation:

The regenerative thermal oxidizer shall meet a minimum control efficiency of 98% for VOC emissions, and a minimum control efficiency of 90% for CO and PM10\*.

\*The control of particulate matter includes a multiclone/cyclone for removal of particulate matter (as dried product) prior to entering the RTO. The control system shall result in a PM10 emission rate not to exceed 10.0 lbs/hr from the RTO.

Applicable Compliance Method:

Compliance with the control efficiency requirements above shall be demonstrated based on the results of emission testing conducted in accordance with the methods outlined in Section f)(1) of this permit. Compliance with the CO destruction efficiency shall be assumed as long as compliance with the hourly CO mass emission limitation is maintained. [Due to the creation of CO in the RTO, it is not possible to perform testing to demonstrate compliance directly associated with the destruction of CO entering the RTO.]

g) Miscellaneous Requirements

(1) None.

**5. P009, dryer no. 2**

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

dryer no. 2 (60 mmBtu/hr natural gas fired) controlled with a regenerative thermal oxidizer

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)f., and d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	Carbon monoxide (CO) emissions from P007, P008 and P009 combined, shall not exceed 10.5 lbs/hr and 45.9 TPY [see b)(2)a and c)(1)].  Particulate matter equal to or less than 10 microns in size (PM10), from emissions units P007, P008 and P009 combined, shall not exceed 10.0 lbs/hr and 43.8 TPY [see b)(2)a., b)(2)b. and C)(1)]  Volatile organic compound (VOC) emissions from P007, P008 and P009 combined, shall not exceed 10.34 lbs/hr and 45.3 TPY. [see b)(2)a and c)(1)]  Visible particulate emissions (PE) from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		minute average during normal and RTO downtime operations.
b.	ORC rule 3704.03(T)	Nitrogen oxides (NOx) emissions from emissions units P007, P008 and P009 combined shall not exceed 11.0 pounds per hour (lbs/hr).  See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)e.
f.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(4).

## (2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for CO, PM<sub>10</sub> and VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:
- i. 10.5 lbs/hr and 45.9 tpy CO (for P007, P008 and P009 combined);
  - ii. 10.0 lbs/hr PM<sub>10</sub> and 43.8 tpy PM<sub>10</sub>(for P007, P008 and P009 combined);
  - iii. visible PE shall not exceed 5% opacity, as a six-minute average (during normal operations and RTO downtime);
  - iv. 10.3 lbs/hr and 45.3 tpy VOC (for P007, P008 and P009 combined).
- b. All emissions of particulate matter are PM<sub>10</sub>.
- c. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be a NOx emission limitation not to exceed 11.0 lbs/hr (for P007, P008 and P009 combined) and compliance with the lb/hr emission limitations established under OAC rule 3745-31-05(F).

The emission rates above represent the potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design). Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

- d. The emissions of sulfur dioxide (SO<sub>2</sub>) from this emissions unit have been determined to be negligible and therefore emission limitations under OAC rule 3745-31-05(A)(3), as effective 11-30-01, have not been established in this permit.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) **Operational Restrictions**

(1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE: [See b)(2)a.):

- a. the use of a regenerative thermal oxidizer (RTO) following a wet scrubber meeting a minimum control efficiency of 90% for CO and particulate matter\* and 98% for VOC emissions; and
- b. firing only natural gas in the RTO.

\*The control of particulate matter includes a multiclone/cyclone for removal of particulate matter (as dried product) prior to entering the RTO. The control system shall result in a PM<sub>10</sub> emission rate not to exceed 10.0 lbs/hr (for P007, P008, P009 and P010 combined) from the RTO.

- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall shut down this emissions unit when the RTO experiences an unscheduled shutdown.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination

and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

- (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (3) The permittee shall maintain a record of all instances when this emissions unit was in operation when the RTO was shutdown.
- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the proposed combined increase for each toxic air contaminant (as defined in OAC rule 3745-114-01) from emission units J001, P007, P008, P009, and P010 will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit deviation reports that identify all instances when emissions units P008 and/or P009 were in operation [see b)(2)d. and c)(3)] when the RTO was shut down. These reports shall be submitted within 30 days after the deviation occurs.

- (3) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment (thermal incinerator) during the operation of this emissions unit:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 180 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than one year after issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the NO<sub>x</sub>, CO, VOC, and PM<sub>10</sub> mass emission limitations from the regenerative thermal oxidizer controlling this emissions unit. Emission testing shall also be conducted to demonstrate compliance with the control efficiency limitation for VOCs from the scrubber controlling this emissions unit, and for the control efficiency limitation for VOCs from the regenerative thermal oxidizer controlling this emissions unit. Emission testing shall also be conducted to verify the expected emissions for single and combined HAPs.

- c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
- i. for PM<sub>10</sub>, Methods 201/201A and 202 of 40 CFR Part 51, Appendix M;
  - ii. for NO<sub>x</sub>, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
  - iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and
  - iv. for total VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A for determining total VOC mass emissions; and
  - v. for HAPs (acetaldehyde, hexane, formaldehyde, acrolein, toluene, xylenes), Methods 18 or 320 from 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.

- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A for VOC emissions .
- e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
- f. The test(s) shall be conducted while emissions units P007, P008 and P009 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, NWDO.
- g. During emission testing, the permittee shall also record the following information:
- i. the average combustion temperature within the thermal incinerator, in degrees Fahrenheit.
- h. 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, NWDO. 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, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO 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, NWDO.

Future testing requirements shall be conducted in accordance with applicable rules, policies, etc. (i.e. Engineering Guide #16, OAC rule 3745-15-04, etc.) Testing time frames may be amended or waived for cause upon prior request of and written approval of, the Ohio EPA Northwest District Office.

- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

10.34 lb VOC/hr, 45.3 tpy VOC (for emissions units P007, P008 and P009 combined)

11.0 lbsNOx/hr (for emissions units P007, P008 and P009 combined)

10.5 lbs CO/hr, 45.9 tpy CO (for emissions units P007, P008 and P009 combined)

10.0 lbs PM10/hr, 43.8 tpy PM10 (for emissions units P007, P008 and P009 combined)

Applicable Compliance Method:

Compliance with the hourly allowable emission limitations above shall be demonstrated based on the results of emission testing conducted in accordance with the following:

- i. for PM10, Methods 201/201A and 202 of 40 CFR Part 51, Appendix M;
- ii. for NOx, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
- iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and
- iv. for total VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A.

The annual emission limitations were developed by multiplying the respective hourly emission limitations by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitations, compliance with the annual limitations shall also be demonstrated.

b. Emission Limitation:

Visible PE from the RTO stack shall not exceed 5% opacity, as a six-minute average (during normal operation and RTO downtime).

Appliance Compliance Method:

If required compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

c. Emission Limitation:

The regenerative thermal oxidizer shall meet a minimum control efficiency of 98% for VOC emissions, and , a minimum control efficiency of 90% for CO and PM10\*.

\*The control of particulate matter includes a multiclone/cyclone for removal of particulate matter (as dried product) prior to entering the RTO. The control system shall result in a PM10 emission rate not to exceed 10.0 lbs/hr from the RTO.

Applicable Compliance Method:

Compliance with the control efficiency requirements above shall be demonstrated based on the results of emission testing conducted in accordance with the methods outlined in Section f)(1) of this permit. Compliance with the CO destruction efficiency shall be assumed as long as compliance with the hourly CO mass emission limitation is maintained. [Due to the creation of CO in the RTO, it is not possible to perform testing to demonstrate compliance directly associated with the destruction of CO entering the RTO.]

g) Miscellaneous Requirements

(1) None.

**6. P010, DDGS storage**

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

cooling and storage of DDGS

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)f. and d)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	<p><u>From Stack SV010 (fluid bed cooler stack):</u></p> <p>0.003 grain PM10 per dry standard cubic foot (gr/dscf)</p> <p>Visible particulate emissions (PE), shall not exceed 0% opacity, as a six-minute average.</p> <p><u>From Stacks SV011 and SV012 (Storage silo and Flat storage)</u></p> <p>0.004 grain PM10/dscf</p> <p>Visible particulate emissions (PE), from the stack(s) serving this portion of the emissions unit, shall not exceed 0% opacity, as a six-minute average.</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions from stacks SV010, SV011 and SV012 shall not exceed 3.88 tons PM10 per year  See b)(2)a., b)(2)b. and c)(1)
b.	ORC rule 3704.03(T)	0.22lb VOC per ton DDGS cooled from the fluid bed cooler stack (SV010)  See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
d.	OAC rule 3745-17-11(B)	See b)(2)e.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
F	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(2).

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for PM<sub>10</sub>. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:
- i. 3.88 tons PM10/year  
From Stack SV010 (fluid bed cooler stack):
  - ii. 0.003 gr PM10/dscf; and
  - iii. visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average.  
From Stacks SV011 and SV012 (Storage silo and Flat storage)
  - iv. 0.004 gr PM10/dscf; and
  - v. visible particulate emissions (PE), from the stack(s) serving this portion of the emissions unit, shall not exceed 0% opacity, as a six-minute average.
- b. All emissions of particulate matter are PM10.
- c. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be the following:

- i. a VOC emission limitation not to exceed 0.22 lb/ton DDGS cooled from stack SV010.

The VOC emission rate above represents the potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design) during each operating scenario. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- d. The following requirements contained in this permit satisfy the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:

- i. compliance with the following regulations:

- (a) OAC rule 3745-31-05(F)

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

c) **Operational Restrictions**

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE: [See b)(2)a.):

- a. the use of a baghouse serving the fluid bed cooler (stack SV010), achieving a maximum outlet concentration of 0.003 gr/dscf for PM10; and
- b. the use of a baghouse system serving the storage silo and flat storage (stacks Sv011 and SV012), achieving a maximum outlet concentration of 0.004 gr/dscf for PM10.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s)

serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the proposed combined increase for each toxic air contaminant (as defined in OAC rule 3745-114-01) from emission units J001, P007, P008, P009, and P010 will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(3) above:
  - a. a summary of the total annual grain throughput, in tons, for this emissions unit covering the time period from April 1<sup>st</sup> to March 31<sup>st</sup> of the previous calendar year.

The above information shall be provided within the "Additional Information and Corrections" section of the PER.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
0.003 grain PM10/dscf from stack SV010; 0.004 grain PM10/dscf from stacks SV011 & SV012 and 3.88 tons PM10/year from stacks SV010, SV011 and SV102

Applicable Compliance Method:

Compliance with the grain loadings of 0.003 gr/dscf and 0.004 gr/dscf was demonstrated through stack testing conducted on June 3-5 and 9-10, 2008. If required, compliance shall be demonstrated through emission testing conducted in accordance with Methods 201/201(A) and 202 of 40 CFR Part 51, Appendix M.

Compliance with the annual allowable PM10 emission limitation shall be demonstrated based on the baghouse outlet grain loading and the maximum volumetric flow rate as follows:

PM10 (tons/yr) = fluid bed cooler baghouse grain loading (0.003 gr/dscf) x 1 lb/7000 gr x maximum volumetric flow rate of the baghouse (23,800 cfm) x 60 min/hour x 8760 hours/yr x ton/2000 lbs + storage silo and flat storage baghouse grain loading (0.004 gr/dscf) x 1 lb/7000 gr x maximum volumetric flow rate of the baghouses (8,000 cfm\*) x 60 min/hour x 8760 hours/yr x ton/2000 lbs.

Therefore, as long as compliance with the 0.003 gr/dscf and 0.004 gr/dscf is maintained, compliance with the annual PM10 limitation shall also be demonstrated.

\*Combined flow from stacks SV011 and SV012 (both 4000 dscfm).

g) Miscellaneous Requirements

- (1) None.

**7. P901, grain receiving**

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

grain receiving, transferring, conveying and storage

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	<p><u>Stack Emissions:</u>            The baghouse controlling this emissions unit shall achieve an outlet emission rate of not greater than 0.004 grain of particulate matter equal to or less than 10 microns in size (PM10) per dry standard cubic foot of exhaust gases (gr/dscf).</p> <p>3.52 tons PM10/year from P901 and P902 combined</p> <p>Visible particulate emissions (PE) from the baghouse stack shall not exceed 0% opacity.</p> <p><u>Fugitive Emissions:</u>            1.65 tons fugitive PM10/year</p> <p>Visible fugitive PE shall not exceed 5%</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		opacity, as a 3-minute average, from any truck or rail unloading.  Visible fugitive PE shall not exceed 0% opacity, as a 3-minute average, from any grain handling operations.  See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)c.
d.	OAC rule 3745-17-07 (B)	See b)(2)d.
e.	OAC rule 3745-17-08 (B)	See b)(2)e.
f.	40 CFR Part 60, Subpart DD	See b)(2)f.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for PM<sub>10</sub>. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:

- i. 0.004 grPM<sub>10</sub>/dscf and 3.52 tpy PM<sub>10</sub>\* for stack emissions;
- ii. Visible particulate PE from the baghouse stack shall not exceed 0% opacity.
- iii. 1.65 tons fugitive PM<sub>10</sub>/year
- iv. Visible fugitive PE shall not exceed 5% opacity, as a 3-minute average, from any truck or rail unloading.
- v. Visible fugitive PE shall not exceed 0% opacity, as a 3-minute average, from any grain handling operations.

\*All stack emissions of particulate matter are PM<sub>10</sub>.

b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

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- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
- ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM10 emissions from this air contaminant source since the potential to emit for PM10 emissions is less than 10 tons per year.

- d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- e. This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- f. 40 CFR Part 60, Subpart DD (Standards of Performance for Grain Elevators), is applicable to grain storage elevators at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant with a permanent grain storage capacity greater than 1.0 million U.S. bushels. The permanent grain storage capacity of this facility is 1.34 bushels, but the facility is classified as a dry corn chemical manufacturing (not for human consumption). Therefore, 40 CFR Part 60, Subpart DD, is not applicable.

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable limitation requirements which limit PTE [see b)(2)a.]:
  - a. the use of a partial enclosure for grain receiving;
  - b. the use of a total enclosure for transferring/conveying and storage; and
  - c. the use of a baghouse for grain receiving, transferring/conveying and storage achieving a maximum outlet concentration of 0.004 gr/dscf for PM10.
- (2) The permittee shall not exceed an annual material throughput rate of 787,041 tons of grain received.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible fugitive 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.

- (3) The permittee shall maintain monthly records of the amount (tons of grain per month and total tons of grain, to date for the calendar year) material throughput for this emissions unit.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(3) above:

- a. a summary of the total annual grain throughput, in tons, for this emissions unit covering the time period from Jan 1<sup>st</sup> to Dec 31<sup>st</sup> of the previous calendar year.

The above information shall be provided within the "Additional Information and Corrections" section of the PER.

- (3) The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit (b) identify all days during which any visible fugitive particulate emissions were observed from the egress points serving this emissions unit (c) describe any corrective actions taken to eliminate the visible particulate emissions from the baghouse stack and (d) describe any corrective actions taken to eliminate the visible fugitive particulate emissions from the egress points serving this emissions unit. These reports shall be submitted to the Ohio EPA, NWDO by January 31 and July 31 of each year and shall cover the previous 6-month period.

All quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:  
0.004 gr PM10/dscf of exhaust gas and 3.52 TPY PM10.

Applicable Compliance Method:

Compliance with the outlet concentration of 0.004 gr/dscf of filterable PM10 was demonstrated through emission testing conducted on June 3-5 and 9-10, 2008. If required, compliance shall be demonstrated through emissions testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, Methods 1-4 (volumetric air flow rate). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

Compliance with the annual allowable PM10 emission limitation shall be demonstrated based on the baghouse outlet grain loading and the maximum volumetric flow rate as follows:

$PM10 \text{ (tons/yr)} = \text{baghouse grain loading (0.004 gr/dscf)} \times 1 \text{ lb/7000 gr} \times \text{maximum volumetric flow rate of the baghouse (23,450 cfm)} \times 60 \text{ min/hour} \times 8760 \text{ hours/yr} \times \text{ton/2000lbs}$

Therefore, as long as compliance with the 0.004 gr/dscf is maintained and the volumetric air flow rate is verified through testing, compliance with the annual PM10 limitation shall also be demonstrated.

- b. Emission Limitation:  
Fugitive PM10 shall not exceed 1.65 tons/yr.

Applicable Compliance Method:

Compliance with the annual emission limitations above may be demonstrated by the following calculations using the AP-42 emission factors (Section 9.9.1, April 2003) and the maximum grain throughput.

$= 787,041 \text{ ton/yr} \times 0.021 \text{ lb PM10/ton} \times 0.0005 \text{ ton/lb} \times 0.2 \text{ (80\% capture efficiency)} = 1.65 \text{ tons PM10/year}$

- c. Emission Limitation:  
Visible PE from the baghouse stack shall not exceed 0% opacity

Applicable Compliance Method:

If required compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

- d. Emission Limitation:  
Visible fugitive PE shall not exceed 5% opacity, from any truck or rail unloading.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

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e. Emission Limitation:

Visible fugitive PE shall not exceed 0% opacity, from any grain handling operations.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

**8. P902, DDCS loadout**

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

DDGS loadout

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	<p><u>Stack Emissions:</u>            The baghouse controlling this emissions unit shall achieve an outlet emission rate of not greater than 0.004 grain of particulate matter equal to or less than 10 microns in size (PM10) per dry standard cubic foot of exhaust gases (gr/dscf).</p> <p>3.52 tons PM10/year from P901 and P902 combined</p> <p>Visible particulate emissions (PE) from the baghouse stack shall not exceed 0% opacity, as a 6-minute average.</p> <p><u>Fugitive Emissions:</u>            1.59 tons fugitive PM10/year</p> <p>Visible fugitive emissions shall not</p>

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POET Biorefining - Leipsic

**Permit Number:** P0107812

**Facility ID:** 0369000051

**Effective Date:** 6/27/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 5% opacity, as a 3-minute average, from the dried distiller's grains with soluble (DDGS) loadout.  See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)c.
d.	OAC rule 3745-17-07 (B)	See b)(2)d.
e.	OAC rule 3745-17-08 (B)	See b)(2)e.
f.	OAC rule 3745-17-07(A)	See b)(2)f.
g.	OAC rule 3745-17-11(B)	See b)(2)f.

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for PM<sub>10</sub>. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:
- i. 0.004 gr PM<sub>10</sub>/dscf and 3.52 tpy PM<sub>10</sub>\* for stack emissions;
  - ii. Visible particulate PE from the baghouse stack shall not exceed 0% opacity.
  - iii. 1.59 tons fugitive PM<sub>10</sub>/year
  - iv. Visible fugitive emissions shall not exceed 5% opacity, as a 3-minute average, from the dried distiller's grains with soluble (DDGS) loadout.
- \*All stack emissions of particulate matter are PM<sub>10</sub>.
- b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:
- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
  - ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM<sub>10</sub> emissions from this air contaminant source since the potential to emit for PM<sub>10</sub> emissions is less than 10 tons per year.

- d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- e. This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) **Operational Restrictions**

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable limitation requirements which limit PTE [see b)(2)a.):
  - a. for DDGS rail loadout, the use of partial enclosure with aspiration to a baghouse achieving a maximum outlet concentration of 0.004 gr PM<sub>10</sub>/dscf; and
  - b. for truck loadout, the use of partial enclosure

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the

baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible fugitive 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.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit (b) identify all days during which any visible fugitive particulate emissions were observed from the egress points serving this emissions unit (c) describe any corrective actions taken to eliminate the visible particulate emissions from the baghouse stack and (d) describe any corrective actions taken to eliminate the visible fugitive particulate emissions from the egress points serving this emissions unit. All quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an

alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.004 gr PM10/dscf of exhaust gas and 3.52 TPY PM10

Applicable Compliance Method:

Compliance with the outlet concentration of 0.004 gr/dscf of PM10 was demonstrated through emission testing conducted on June 3-5 and 9-10, 2008. If required, compliance shall be demonstrated through emissions testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, Methods 1-4 (volumetric air flow rate). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

Compliance with the annual allowable filterable PM10 emission limitation shall be demonstrated based on the baghouse outlet grain loading and the maximum volumetric flow rate as follows:

Filterable PM10 (tons/yr) = baghouse grain loading (0.004 gr/dscf) x 1 lb/7000 gr x maximum volumetric flow rate of the baghouse (23,450 cfm) x 60 min/hour x 8760 hours/yr x ton/2000lbs

Therefore, as long as compliance with the 0.004 gr/dscf is maintained and the volumetric air flow rate is verified through testing, compliance with the annual PM10 limitation shall be ensured.

b. Emission Limitation:

Fugitive PM10 shall not exceed 1.59 tons/yr.

Applicable Compliance Method:

Compliance with the annual emission limitations above may be demonstrated by the following calculations using the AP-42 emission factors (Section 9.9.1, April 2003) and the maximum grain throughput.

= 218,797 tons/yr x 0.029 lb PM10/ton x 0.0005 ton/lb x 0.5 (50% capture efficiency) = 1.59 tons PM10/year

c. Emission Limitation:

Visible PE from the baghouse stack shall not exceed 0% opacity

**Final Permit-to-Install and Operate**

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Applicable Compliance Method:

If required compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

d. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity, as a 3-minute average from DDGS loadout

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

**9. T001, 190 ethanol tank**

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

250,000 gallon storage tank (190 proof ethanol tank)

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)e.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	0.38 ton volatile organic compounds (VOC)/year  See b)(2)a. and c)(1)
b.	40 CFR Part 60, Subpart Kb	See b)(2)b. through b)(2)m.
c.	OAC rule 3745-21-09(L)	See b)(2)n.
d.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)o.
e.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)p.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the

operational restrictions contained in c)(1) which require control equipment and process control:

- i. 0.34 ton VOC/year;
- b. The fixed roof storage tank shall be equipped with an internal floating roof.
- c. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- d. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- e. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- f. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- g. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- h. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and

stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

- i. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- j. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- k. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- l. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- m. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- n. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01 (E)(13).
- o. The following requirements contained in this permit satisfy the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:
  - i. compliance with the following regulations:
    - (a) OAC rule 3745-31-05(F)
    - (b) 40 CFR Part 60, Subpart Kb

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- p. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):

- a. use of an internal floating roof
- b. a maximum annual throughput not to exceed 98,463,768 gallons

- (2) The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 0.516 pound per square inch.

d) Monitoring and/or Recordkeeping Requirements

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

- a. The types of petroleum liquids stored in the tank.
- b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 0.516 pound per square inch absolute. Available data on the storage temperature may be used to determine the maximum true vapor pressure as in the following:
  - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  - ii. For refined petroleum products the vapor pressure may be obtained by the following:
    - (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from

nomographs contained in API Bulletin 2517 (incorporated by reference--see Sec. 60.17), unless the Ohio EPA, NWDO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

- (b) (The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
  - iii. For other liquids, the vapor pressure:
    - (a) May be obtained from standard reference texts, or
    - (b) Determined by ASTM Method D2879-83 (incorporated by reference--see Sec. 60.17); or
    - (c) Measured by an appropriate method approved by the Ohio EPA, NWDO; or
    - (d) Calculated by an appropriate method approved by the Ohio EPA, NWDO.
- (2) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (3) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA, NWDO in the inspection report required in D.3. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (4) For vessels equipped with a double-seal system as specified in b)(2)f.ii.:
  - a. The permittee shall visually inspect the vessel as specified in d)(5) at least every 5 years; or

- b. The permittee shall visually inspect the vessel as specified in d)(3).
- (5) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in d)(3) and d)(4)b. and at intervals no greater than 5 years in the case of vessels specified in d)(4)a.
- (6) The owner or operator shall keep copies of all reports and records required in e)(2), e)(3), and e)(4), for at least 2 years.
- (7) The permittee shall keep a record of each inspection performed as required by d)(2), d)(3), d)(4), and d)(5). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- (8) The owner or operator shall keep copies of all records required by d)(2) through d)(8), for at least 2 years.
- (9) The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel (shall be kept for the life of the source).
- (10) The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Ohio EPA, NWDO in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by d)(2) and d)(5) to afford the Ohio EPA, NWDO the opportunity to have an observer present. If the inspection required by d)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Ohio EPA, NWDO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written

documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, NWDO at least 7 days prior to the refilling.

- (3) If any of the conditions described in d)(3) are detected during the annual visual inspection required by d)(3), a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
- (4) After each inspection required by d)(4) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in d)(4)b., a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of b)(2)e. through b)(2)m. or d)(4) and list each repair made.
- (5) If the permittee placed, stored, or held in this emissions unit any petroleum liquid with a true vapor pressure which was greater than 0.516 pounds per square inch absolute, the permittee shall notify the Ohio EPA, NWDO within 30 days of becoming aware of the occurrence.
- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.38 TPY of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation by rim seal loss, withdraw loss and deck fitting loss calculations as determined by U.S. EPA Tanks 4.0 program with a maximum annual material throughput of 98,463,768gallons.

g) Miscellaneous Requirements

- (1) None.

**10. T002, denaturant tank**

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

250,000 gallon storage tank (denaturant)

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	1.02 ton volatile organic compounds (VOC)/year  See b)(2)a. and c)(1)
b.	40 CFR Part 60, Subpart Kb	See b)(2)b. through b)(2)m.
c.	OAC rule 3745-21-09(L)	See b)(2)n.
d.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)o.
e.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)p.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the

operational restrictions contained in c)(1) which require control equipment and process control:

- i. 1.02 ton VOC/year;
- b. The fixed roof storage tank shall be equipped with an internal floating roof.
- c. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- d. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- e. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- f. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- g. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- h. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and

stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

- i. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- j. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- k. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- l. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- m. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- n. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01 (E)(13).
- o. The following requirements contained in this permit satisfy the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:
  - i. compliance with the following regulations:
    - (a) OAC rule 3745-31-05(F)
    - (b) 40 CFR Part 60, Subpart Kb

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- p. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):
  - a. use of an internal floating roof
  - b. a maximum annual throughput not to exceed 2,811,375gallons

- (2) The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 7.16 pound per square inch.

d) Monitoring and/or Recordkeeping Requirements

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

- a. The types of petroleum liquids stored in the tank.
- b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 7.16 pound per square inch absolute. Available data on the storage temperature may be used to determine the maximum true vapor pressure as in the following:
  - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  - ii. For refined petroleum products the vapor pressure may be obtained by the following:
    - (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from

nomographs contained in API Bulletin 2517 (incorporated by reference--see Sec. 60.17), unless the Ohio EPA, NWDO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

- (b) (The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
  - iii. For other liquids, the vapor pressure:
    - (a) May be obtained from standard reference texts, or
    - (b) Determined by ASTM Method D2879-83 (incorporated by reference--see Sec. 60.17); or
    - (c) Measured by an appropriate method approved by the Ohio EPA, NWDO; or
    - (d) Calculated by an appropriate method approved by the Ohio EPA, NWDO.
- (2) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (3) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA, NWDO in the inspection report required in D.3. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (4) For vessels equipped with a double-seal system as specified in b)(2)f.ii.:
  - a. The permittee shall visually inspect the vessel as specified in d)(5) at least every 5 years; or

- b. The permittee shall visually inspect the vessel as specified in d)(3).
- (5) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in d)(3) and d)(4)b. and at intervals no greater than 5 years in the case of vessels specified in d)(4)a.
- (6) The owner or operator shall keep copies of all reports and records required in e)(2), e)(3), and e)(4), for at least 2 years.
- (7) The permittee shall keep a record of each inspection performed as required by d)(2), d)(3), d)(4), and d)(5). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- (8) The owner or operator shall keep copies of all records required by d)(2) through d)(8), for at least 2 years.
- (9) The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel (shall be kept for the life of the source).
- (10) The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Ohio EPA, NWDO in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by d)(2) and d)(5) to afford the Ohio EPA, NWDO the opportunity to have an observer present. If the inspection required by d)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Ohio EPA, NWDO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written

documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, NWDO at least 7 days prior to the refilling.

- (3) If any of the conditions described in d)(3) are detected during the annual visual inspection required by d)(3), a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
- (4) After each inspection required by d)(4) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in d)(4)b., a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of b)(2)e. through b)(2)m. or d)(4) and list each repair made.
- (5) If the permittee placed, stored, or held in this emissions unit any petroleum liquid with a true vapor pressure which was greater than 7.16 pounds per square inch absolute, the permittee shall notify the Ohio EPA, NWDO within 30 days of becoming aware of the occurrence.
- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.02 TPY of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation by rim seal loss, withdraw loss and deck fitting loss calculations as determined by U.S. EPA Tanks 4.0 program with a maximum annual material throughput of 2,811,375 gallons.

g) Miscellaneous Requirements

- (1) None.

**11. T003, 200 ethanol tank**

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

2 million gallon storage tank (200 proof ethanol)

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)e.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	0.20 ton volatile organic compounds (VOC)/year  See b)(2)a. and c)(1)
b.	40 CFR Part 60, Subpart Kb	See b)(2)b. through b)(2)m.
c.	OAC rule 3745-21-09(L)	See b)(2)n.
d.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)o.
e.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)p.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the

operational restrictions contained in c)(1) which require control equipment and process control:

- i. 0.20 ton VOC/year;
- b. The fixed roof storage tank shall be equipped with an internal floating roof.
- c. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- d. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- e. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- f. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- g. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- h. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and

stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

- i. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- j. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- k. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- l. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- m. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- n. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01 (E)(13).
- o. The following requirements contained in this permit satisfy the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:
  - i. compliance with the following regulations:
    - (a) OAC rule 3745-31-05(F)
    - (b) 40 CFR Part 60, Subpart Kb

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- p. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):
  - a. use of an internal floating roof
  - b. a maximum annual throughput not to exceed 39,561,375 gallons

- (2) The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 0.69 pound per square inch.

d) Monitoring and/or Recordkeeping Requirements

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

- a. The types of petroleum liquids stored in the tank.

- b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 0.69 pound per square inch absolute. Available data on the storage temperature may be used to determine the maximum true vapor pressure as in the following:

- i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

- ii. For refined petroleum products the vapor pressure may be obtained by the following:

- (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from

nomographs contained in API Bulletin 2517 (incorporated by reference--see Sec. 60.17), unless the Ohio EPA, NWDO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

- (b) (The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
  - iii. For other liquids, the vapor pressure:
    - (a) May be obtained from standard reference texts, or
    - (b) Determined by ASTM Method D2879-83 (incorporated by reference--see Sec. 60.17); or
    - (c) Measured by an appropriate method approved by the Ohio EPA, NWDO; or
    - (d) Calculated by an appropriate method approved by the Ohio EPA, NWDO.
- (2) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (3) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA, NWDO in the inspection report required in D.3. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (4) For vessels equipped with a double-seal system as specified in b)(2)f.ii.:
  - a. The permittee shall visually inspect the vessel as specified in d)(5) at least every 5 years; or

- b. The permittee shall visually inspect the vessel as specified in d)(3).
- (5) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in d)(3) and d)(4)b. and at intervals no greater than 5 years in the case of vessels specified in d)(4)a.
  - (6) The owner or operator shall keep copies of all reports and records required in e)(2), e)(3), and e)(4), for at least 2 years.
  - (7) The permittee shall keep a record of each inspection performed as required by d)(2), d)(3), d)(4), and d)(5). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
  - (8) The owner or operator shall keep copies of all records required by d)(2) through d)(8), for at least 2 years.
  - (9) The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel (shall be kept for the life of the source).
  - (10) The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall notify the Ohio EPA, NWDO in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by d)(2) and d)(5) to afford the Ohio EPA, NWDO the opportunity to have an observer present. If the inspection required by d)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Ohio EPA, NWDO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written

documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, NWDO at least 7 days prior to the refilling.

- (3) If any of the conditions described in d)(3) are detected during the annual visual inspection required by d)(3), a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
- (4) After each inspection required by d)(4) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in d)(4)b., a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of b)(2)e. through b)(2)m. or d)(4) and list each repair made.
- (5) If the permittee placed, stored, or held in this emissions unit any petroleum liquid with a true vapor pressure which was greater than 0.69 pounds per square inch absolute, the permittee shall notify the Ohio EPA, NWDO within 30 days of becoming aware of the occurrence.
- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.20 TPY of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation by rim seal loss, withdraw loss and deck fitting loss calculations as determined by U.S. EPA Tanks 4.0 program with a maximum annual material throughput of 39,561,375 gallons.

g) Miscellaneous Requirements

- (1) None.

**12. T004, 200 ethanol tank**

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

2 million gallon storage tank (200 proof ethanol)

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)e.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	0.20 ton volatile organic compounds (VOC)/year  See b)(2)a. and c)(1)
b.	40 CFR Part 60, Subpart Kb	See b)(2)b. through b)(2)m.
c.	OAC rule 3745-21-09(L)	See b)(2)n.
d.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)o.
e.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)p.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the

operational restrictions contained in c)(1) which require control equipment and process control:

- i. 0.20 ton VOC/year;
- b. The fixed roof storage tank shall be equipped with an internal floating roof.
- c. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- d. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- e. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- f. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- g. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- h. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and

stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

- i. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- j. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- k. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- l. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- m. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- n. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01 (E)(13).
- o. The following requirements contained in this permit satisfy the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:
  - i. compliance with the following regulations:
    - (a) OAC rule 3745-31-05(F)
    - (b) 40 CFR Part 60, Subpart Kb

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- p. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):
  - a. use of an internal floating roof
  - b. a maximum annual throughput not to exceed 39,561,375 gallons

- (2) The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 0.69 pound per square inch.

d) Monitoring and/or Recordkeeping Requirements

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

- a. The types of petroleum liquids stored in the tank.
- b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 0.69 pound per square inch absolute. Available data on the storage temperature may be used to determine the maximum true vapor pressure as in the following:
  - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  - ii. For refined petroleum products the vapor pressure may be obtained by the following:
    - (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from

nomographs contained in API Bulletin 2517 (incorporated by reference--see Sec. 60.17), unless the Ohio EPA, NWDO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

- (b) (The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
  - iii. For other liquids, the vapor pressure:
    - (a) May be obtained from standard reference texts, or
    - (b) Determined by ASTM Method D2879-83 (incorporated by reference--see Sec. 60.17); or
    - (c) Measured by an appropriate method approved by the Ohio EPA, NWDO; or
    - (d) Calculated by an appropriate method approved by the Ohio EPA, NWDO.
- (2) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (3) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA, NWDO in the inspection report required in D.3. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (4) For vessels equipped with a double-seal system as specified in b)(2)f.ii.:
  - a. The permittee shall visually inspect the vessel as specified in d)(5) at least every 5 years; or

- b. The permittee shall visually inspect the vessel as specified in d)(3).
- (5) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in d)(3) and d)(4)b. and at intervals no greater than 5 years in the case of vessels specified in d)(4)a.
  - (6) The owner or operator shall keep copies of all reports and records required in e)(2), e)(3), and e)(4), for at least 2 years.
  - (7) The permittee shall keep a record of each inspection performed as required by d)(2), d)(3), d)(4), and d)(5). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
  - (8) The owner or operator shall keep copies of all records required by d)(2) through d)(8), for at least 2 years.
  - (9) The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel (shall be kept for the life of the source).
  - (10) The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall notify the Ohio EPA, NWDO in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by d)(2) and d)(5) to afford the Ohio EPA, NWDO the opportunity to have an observer present. If the inspection required by d)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Ohio EPA, NWDO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written

documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, NWDO at least 7 days prior to the refilling.

- (3) If any of the conditions described in d)(3) are detected during the annual visual inspection required by d)(3), a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
  - (4) After each inspection required by d)(4) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in d)(4)b., a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of b)(2)e. through b)(2)m. or d)(4) and list each repair made.
  - (5) If the permittee placed, stored, or held in this emissions unit any petroleum liquid with a true vapor pressure which was greater than 0.69 pounds per square inch absolute, the permittee shall notify the Ohio EPA, NWDO within 30 days of becoming aware of the occurrence.
  - (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
0.20 TPY of VOC  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation by rim seal loss, withdraw loss and deck fitting loss calculations as determined by U.S. EPA Tanks 4.0 program with a maximum annual material throughput of 39,561,375gallons.
- g) Miscellaneous Requirements
- (1) None.

**13. T005, denaturant tank**

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

126,900 gallon storage tank (denaturant)

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)e.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	0.99 ton volatile organic compounds (VOC)/year  See b)(2)a. and c)(1)
b.	40 CFR Part 60, Subpart Kb	See b)(2)b. through b)(2)m.
c.	OAC rule 3745-21-09(L)	See b)(2)n.
d.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)o.
e.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)p.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for VOC. The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the

operational restrictions contained in c)(1) which require control equipment and process control:

- i. 0.99 ton VOC/year;
- b. The fixed roof storage tank shall be equipped with an internal floating roof.
- c. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports, and the rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports or is at the manufacturer's recommended setting.
- d. All openings, except stub drains, shall be equipped with a cover, seal or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
- e. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- f. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- g. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- h. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and

stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

- i. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- j. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- k. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- l. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- m. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- n. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01 (E)(13).
- o. The following requirements contained in this permit satisfy the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:
  - i. compliance with the following regulations:
    - (a) OAC rule 3745-31-05(F)
    - (b) 40 CFR Part 60, Subpart Kb

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- p. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):

- a. use of an internal floating roof
- b. a maximum annual throughput not to exceed 2,811,375 gallons

- (2) The maximum true vapor pressure of organic liquid stored in this storage tank shall not exceed 7.16 pound per square inch.

d) Monitoring and/or Recordkeeping Requirements

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

- a. The types of petroleum liquids stored in the tank.
- b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid that has a maximum true vapor pressure greater than 7.16 pound per square inch absolute. Available data on the storage temperature may be used to determine the maximum true vapor pressure as in the following:

- i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

- ii. For refined petroleum products the vapor pressure may be obtained by the following:

- (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from

nomographs contained in API Bulletin 2517 (incorporated by reference--see Sec. 60.17), unless the Ohio EPA, NWDO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

- (b) (The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
  - iii. For other liquids, the vapor pressure:
    - (a) May be obtained from standard reference texts, or
    - (b) Determined by ASTM Method D2879-83 (incorporated by reference--see Sec. 60.17); or
    - (c) Measured by an appropriate method approved by the Ohio EPA, NWDO; or
    - (d) Calculated by an appropriate method approved by the Ohio EPA, NWDO.
- (2) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (3) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Ohio EPA, NWDO in the inspection report required in D.3. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (4) For vessels equipped with a double-seal system as specified in b)(2)f.ii.:
  - a. The permittee shall visually inspect the vessel as specified in d)(5) at least every 5 years; or

- b. The permittee shall visually inspect the vessel as specified in d)(3).
- (5) The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in d)(3) and d)(4)b. and at intervals no greater than 5 years in the case of vessels specified in d)(4)a.
  - (6) The owner or operator shall keep copies of all reports and records required in e)(2), e)(3), and e)(4), for at least 2 years.
  - (7) The permittee shall keep a record of each inspection performed as required by d)(2), d)(3), d)(4), and d)(5). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
  - (8) The owner or operator shall keep copies of all records required by d)(2) through d)(8), for at least 2 years.
  - (9) The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel (shall be kept for the life of the source).
  - (10) The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall notify the Ohio EPA, NWDO in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by d)(2) and d)(5) to afford the Ohio EPA, NWDO the opportunity to have an observer present. If the inspection required by d)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Ohio EPA, NWDO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written

documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA, NWDO at least 7 days prior to the refilling.

- (3) If any of the conditions described in d)(3) are detected during the annual visual inspection required by d)(3), a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
  - (4) After each inspection required by d)(4) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in d)(4)b., a report shall be furnished to the Ohio EPA, NWDO within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of b)(2)e. through b)(2)m. or d)(4) and list each repair made.
  - (5) If the permittee placed, stored, or held in this emissions unit any petroleum liquid with a true vapor pressure which was greater than 7.16 pounds per square inch absolute, the permittee shall notify the Ohio EPA, NWDO within 30 days of becoming aware of the occurrence.
  - (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
0.99 TPY of VOC  
  
Applicable Compliance Method:
  - (3) The permittee shall demonstrate compliance with the annual allowable VOC emission limitation by rim seal loss, withdraw loss and deck fitting loss calculations as determined by U.S. EPA Tanks 4.0 program with a maximum annual material throughput of Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.20 TPY of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation by rim seal loss, withdraw loss and deck fitting loss calculations as determined by U.S. EPA Tanks 4.0 program with a maximum annual material throughput of 2,811,375gallons.

g) Miscellaneous Requirements

(1) None.

**14. Emissions Unit Group -Hammermills P002-P006**

EU ID	Operations, Property and/or Equipment Description
P002	hammermill no. 1
P003	hammermill no. 2
P004	hammermill no. 3
P005	hammermill no. 4
P006	hammermill no. 5

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

b)(1)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	Particulate matter equal to or less than 10 microns in size (PM10) from emissions units P002, P003, P004, P005 and P006 combined, shall not exceed 0.003 grain per dry standard cubic foot (gr/dscf)  6.76 tons PM10/year  Visible particulate emissions (PE) from the baghouse stack shall not exceed 0% opacity, as a six-minute average.  See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05 (A)(3)(a)(ii), as effective 12/1/06	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The following legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment and process control:

- i. 0.003 gr PM10/dscf and 6.76 tpy PM10\*;
- ii. Visible particulate PE from the baghouse stack shall not exceed 0% opacity, as a 6-minute average.

\*All stack emissions of particulate matter are PM10.

b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(F); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective on November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM10 emissions from this air contaminant source since the controlled potential to emit (PTE) is

less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

- d. The emission limitation established by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE: [See b)(2)a.):

- a. use of a baghouse control system achieving a maximum outlet concentration of 0.003 gr PM10/dscf

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. All quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.003 gr PM10/dscf of exhaust gas and 6.76 TPY PM10.

Applicable Compliance Method:

Compliance with the outlet concentration of 0.003 gr PM10/dscf was demonstrated through emission testing conducted on March 24-26, 2009. If required, compliance shall be demonstrated through emissions testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, Methods 1-4 (volumetric air flow rate). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

Compliance with the annual allowable PM10 emission limitation shall be demonstrated based on the baghouse outlet grain loading and the maximum volumetric flow rate as follows:

$$\text{PM10 (tons/yr)} = \text{baghouse grain loading (0.003 gr/dscf)} \times 1 \text{ lb/7000 gr} \times \text{maximum volumetric flow rate of the baghouse (60,000 cfm)} \times 60 \text{ min/hour} \times 8760 \text{ hours/yr} \times \text{ton/2000lbs}$$

Therefore, as long as compliance with the 0.003 gr/dscf is maintained and the volumetric air flow rate is verified through testing, compliance with the annual PM10 limitation shall also be demonstrated.

b. Emission Limitation:

Visible PE from the baghouse stack shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

g) Miscellaneous Requirements

(1) None.