

Facility ID: 0448020004 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0448020004 Emissions Unit ID: P001 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

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.
 - (a) None.
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.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Alfalfa dryer and hammermill	OAC 3745-17-07(A)(1)	See A.2.a
	See section F.2	
	OAC 3745-17-11	38.7 lbs/hr particulate matter
	See section F.2	
	OAC 3745-18-06*	*This applicable rule is less stringent than the rule that resulted in the emission limitation in A.2.b
	See section F.2	

2. Additional Terms and Conditions

- (a) Opacity shall be less than or equal to 20% opacity, as a 6-minute average, from the stack, except as provided by rule.
 The sulfur dioxide emissions shall not exceed 25.4 pounds per hour.
 The annual particulate emissions shall not exceed 68 tons based on a rolling 12-month summation.
 The annual sulfur dioxide emissions shall not exceed 45 tons based on a rolling 12-month summation.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 3,500 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Cumulative Maximum Allowable Month(s) Cumulative Operating Hours
1 1,750
1-2 1,750
1-3 1,750
1-4 1,750
1-5 1,750
1-6 1,750
1-7 2,042
1-8 2,333
1-9 2,625
1-10 2,917
1-11 3,208
1-12 3,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

2. The coal burned in this emissions unit shall contain less than or equal to 1.0% sulfur on a dry basis.
3. The average daily feed rate of the wet chops shall not exceed 24,300 pounds per hour.
4. The maximum coal firing rate shall be 1,300 pounds per hour.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The operating hours during each month.
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative operating hours for each calendar month. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours.
2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses (dry basis) for heat content and sulfur content.
3. The permittee shall maintain daily records of the following information:
 - a. the total feed rate of wet chops to the dryer (in pounds);
 - b. the total hours of operation;
 - c. the average hourly feed rate to the dryer (a/b, in pounds per hour); and
 - d. the coal firing rate for each hour of the day (in pounds per hour).

These daily records shall be maintained in the company's files for a period of not less than five years and shall be made available to personnel from the Ohio Environmental Protection agency or Toledo Division of Environmental Services for review during normal business hours.
4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the number of operating hours exceeded the rolling 12-month limit, and the actual rolling 12-month summation;
 - b. an identification of each month during which the number of operating hours exceeded the cumulative operating hours limit;
 - c. an identification of each shipment of coal where the 1.0% sulfur limitation was exceeded;
 - d. an identification of each day during which the average daily feed rate of the wet chops exceeded 24,300 pounds per hour; and
 - e. an identification of each hour during which the coal firing rate exceeded 1,300 pounds per hour.

These reports, including the corrective actions taken to achieve compliance, shall be submitted semiannually on February 15th and August 15th of each year. If no deviations occurred during the 6-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that 6-month period.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall report annually the tons per year of particulate matter and sulfur dioxide emissions and the hours of operation. These annual reports shall be submitted by February 15 of each year.

E. Testing Requirements

1. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Toledo Division of Environmental Services or Ohio EPA.
2. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation: Less than or equal to 20% opacity, as a 6-minute average
Applicable Compliance Method: OAC 3745-17-03(B)(1)

Emission Limitation: 38.7 lbs/hr of particulate matter
Applicable Compliance Method: OAC 3745-17-03(B)(10)

Emission Limitation: 68 tons of particulate matter per year
Applicable Compliance Method: Multiply the particulate emission rate determined during the most recent stack

test, in pounds of particulate matter per hour, by the rolling 12-month summation of the operating hours, and divide by 2000 pounds per ton.

Emission Limitation: 25.4 lbs/hr of sulfur dioxide

Applicable Compliance Method: Based on stack tests conducted using one percent (or as close to one percent as possible) sulfur coal, compliance will be assumed as long as the coal burned in the emission unit is 1.0% or less of sulfur content and the coal firing rate is less than 1,300 pounds per hour.

Emission Limitation: 45 tons of sulfur dioxide per year

Applicable Compliance Method: Compliance shall be based upon the record keeping in C.1. and calculated by taking the allowable sulfur dioxide limit of 25.4 pounds per hour multiplied by the rolling 12-month rolling summation of operating hours, divided by 2000 pounds per ton to give the amount of sulfur dioxide emitted in tons per year.

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

a. Within 6 calendar months following the issuance of this permit, the permittee shall conduct or have conducted, performance testing on the air contaminant emissions unit(s) to demonstrate compliance with the allowable mass emission rate for particulates and sulfur dioxide. Additional emission tests may be required in accordance with OEPA Engineering Guide #16. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

b. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate; for particulates, Method 5 of 40 CFR Part 60 Appendix A; for sulfur dioxide, Method 6 of 40 CFR Part 60 Appendix A.

c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services or Ohio EPA. 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 Toledo Division of Environmental Services or Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Toledo Division of Environmental Services or Ohio EPA 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/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services or Ohio EPA within 30 days following completion of the test(s).

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable terms and conditions:

Sections A - F

2. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 04-263, as issued on July 16, 1997: sections A - F.

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Facility ID: 0448020004 Emissions Unit ID: P004 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

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.

(a) None.

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.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pellet Mill & Cooler	OAC 3745-17-07(A)(1)	See A.2.a

OAC 3745-17-11

12 lbs/hr of particulate matter

2. **Additional Terms and Conditions**

- (a) The opacity shall be less than or equal to 20% opacity, as a 6-minute average, from the stack, except as provided by rule.
The particulate emissions shall not exceed 21 tons per year, based on a 12-month rolling summation.

B. **Operational Restrictions**

- 1. The maximum annual operating hours for this emissions unit shall not exceed 3,500, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Maximum Allowable
Month(s) Cumulative Operating Hours

- 1 1,750
- 1-2 1,750
- 1-3 1,750
- 1-4 1,750
- 1-5 1,750
- 1-6 1,750
- 1-7 2,042
- 1-8 2,333
- 1-9 2,625
- 1-10 2,917
- 1-11 3,208
- 1-12 3,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

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

- 1. The permittee shall maintain daily records of the following information:

- a. the daily tons of alfalfa pellets produced in the pellet mill; and
- b. the operating hours for that day.

These daily records shall be maintained in the company's files for a period of not less than five years and shall be made available to personnel from the Ohio Environmental Protection agency or Toledo Division of Environmental Services for review during normal business hours

- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

- 3. The permittee shall maintain monthly records of the following information:

- a. The operating hours during each month.
- b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative operating hours for each calendar month. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours.

D. **Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which include the following information:

- a. an identification of each month during which the number of operating hours exceeded the cumulative operating hours limit; and
- b. an identification of each month during which the number of operating hours exceeded the rolling 12-month limit, and the actual rolling 12-month summation.

These reports, including the corrective actions taken to achieve compliance, shall be submitted semiannually on February 15th and August 15th of each year. If no deviations occurred during the 6-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that 6-month period.

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

- 3. The permittee shall report annually the tons per year of particulate matter emissions and the hours of operation for the preceding calendar year. These annual reports shall be submitted by February 15 of each year.

E. **Testing Requirements**

1. Emission Limitation: Less than or equal to 20% opacity, as a 6-minute average
Applicable Compliance Method: OAC 3745-17-03(B)(1)

Emission Limitation: 12 lbs/hr particulate matter
Applicable Compliance Method: Multiply the AP-42 (4/79 Section 6.1) particulate emission factor of 3 pounds of particulate emissions per ton of alfalfa pellets produced, by the daily tons of alfalfa pellets produced, and divide by the operating hours for that day. Also, if required, the permittee shall perform emission tests in accordance with OAC 3745-17-03(B)(10).

Emission Limitation: 21 tons per year particulate matter
Applicable Compliance Method: Either multiply the emission factor for particulate emissions (3 pounds of particulate emissions per ton of alfalfa pellets produced) times the total tons of alfalfa pellets produced during the year, or multiply the emissions factor from the most recent stack test that demonstrated compliance, by the rolling, 12-month summation of the operating hours, and divide by 2000 pounds per ton.
 2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
 - a. Within 6 calendar months following the issuance of this permit, the permittee shall conduct or have conducted, performance testing on the air contaminant emissions unit(s) to demonstrate compliance with the allowable mass emission rate for particulates. Additional emission tests may be required in accordance with OEPA Engineering Guide #16. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - b. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate; for particulates, Method 5 of 40 CFR Part 60 Appendix A.
 - c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services or Ohio EPA. 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 Toledo Division of Environmental Services or Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Toledo Division of Environmental Services or Ohio EPA 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/or the performance of the control equipment.
A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services or Ohio EPA within 30 days following completion of the test(s).
- F. Miscellaneous Requirements**
1. The following terms and conditions are federally enforceable: Sections A, B, C, D, E, F.