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Facility Name: **ADM/Countrymark**

Application Number: **14-4652**

Date: **November 4, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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The air contaminant emissions units listed below comprise the Permit to Install for **ADM/Countrymark** located in **Hamilton** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
F002	Truck receiving with baghouse	Use of a baghouse to control PM emissions	3745-31-05 (BAT)	See Additional Special Term and Condition A.1. and A.2. for BAT determinations and emission limitations.
			3745-17-07 (A)and (B)	See Additional Special Term and Condition A.3. and A.4.
			3745-17-08 (B)	See Additional Special Term and Condition A.5.
			3745-17-11*	Less stringent than BAT
			3745-15-07	See General Terms
F008	Transfer and conveying of grain with baghouse	Use of a baghouse to control PM emissions	3745-31-05 (BAT)	See Additional Special Term and Condition A.1. and A.2. for BAT determinations and emission limitations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
F008 Cont'd			3745-17-07 (A)and (B)	See Additional Special Term and Condition A.3. and A.4.
			3745-17-08 (B)	See Additional Special Term and Condition A.5.
			3745-17-11*	Less stringent than BAT
			3745-15-07	See General Terms
F009	Grain drying	Plate hole diameter less than 0.094 inch	3745-31-05 (BAT)	See Additional Special Term and Condition A.1. and A.2. for BAT determinations and emission limitations.
			3745-17-07 (B)	See Additional Special Term and Condition A.4.
			3745-17-08 (B)	See Additional Special Term and Condition A.5.
			3745-15-07	See General Terms
F010	Truck loading with telescopic chute	Use of telescopic chute	3745-31-05 (BAT)	See Additional Special Term and Condition A.1. and A.2. for BAT determinations and emission limitations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
F010 Cont'd			3745-17-07 (B)	See Additional Special Term and Condition A.4.
			3745-17-08 (B)	See Additional Special Term and Condition A.5.
			3745-15-07	See General Terms

* The emission limitation established by this rule is less stringent than OAC rule 3745-31-05(BAT).

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	.99
PM	88.48
SO ₂	.11
NO _x	17.94
CO	15.07
PM ₁₀	23.47

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport

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and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. Best available technology (BAT) for emissions units covered under permit to install (PTI) 14-4652 shall be defined as follows:

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- a. BAT for the Truck Receiving, emissions unit F002, is the venting of the PM emissions to a baghouse;
 - b. BAT for the Transfer and Conveying of Grain, emissions unit F008, is the venting of the PM emissions to a baghouse;
 - c. BAT for Grain Drying, emissions unit F009, is a plate hole diameter of less than 0.094 inch; and,
 - d. BAT for Truck Loading, emissions unit F010, is the use of a telescopic chute.
2. The following emissions limitations shall not be exceeded:

F002* 47.09 lbs PM/Hr
 15.43 lbs PM₁₀/Hr
 6.43 TPY of PM
 2.11 TPY of PM₁₀

F008* 9.16 lbs PM/Hr
 5.10 lbs PM₁₀/Hr
 2.75 TPY of PM
 1.53 TPY of PM₁₀

F009* 26.4 lbs PM/Hr
 6.60 lbs PM₁₀/Hr
 79.28 TPY of PM
 19.82 TPY of PM₁₀
 0.23 lb OC/Hr
 0.99 TPY of OC
 0.02 lb SO₂/Hr
 0.11 TPY of SO₂
 4.1 lbs NO_x/Hr
 17.94 TPY of NO_x
 3.44 lbs CO/Hr
 15.07 TPY of CO

F010* 3.87 lbs PM/Hr
 1.31 lbs PM₁₀/Hr
 0.015 TPY of PM
 0.005 TPY of PM₁₀

The hourly emission limitation(s) outlined are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

3. Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provide by rule.
4. Fugitive visible particulate emissions shall not exceed 20 percent opacity as a three-minute average, except as provided by rule.
5. The permittee shall utilize reasonable available control measures (RACM) to control fugitive dust emissions.

B. Operational Restrictions

1. The pressure drop across the baghouses for emissions units F002 and F008 shall be maintained within a range of 1-7 inches of water while the emissions units are in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouses while emissions units F002 and F008 are in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis for all days that the emissions units are in operation.
2. The permittee shall maintain monthly records of the following (in pounds or tons):
 - a. the amount of grain unloaded in emissions unit F002;
 - b. the amount of grain transferred and conveyed in emissions unit F008;
 - c. the amount of grain dried in emissions unit F009; and,
 - d. the amount of grain loaded in emissions unit F010.
3. All records required by this permit to install shall be retained on file for a period of not less than five years unless otherwise indicated by the Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Additional Special Term and Condition B.1.
2. The permittee shall submit annual reports which specify the total particulate emissions from emissions unit F009.
3. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Department of Environmental Services; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.

E. Testing Requirements

1. Compliance with the particulate emission limitations for emission units F002, F008, F009, and F010 shall be determined by multiplying the applicable emission factor from AP-42, Fifth Edition, Table 9.9.1-1, by the throughput of grain and by the overall control efficiency of any control device present.

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Should stack testing be required to demonstrate compliance with the particulate emission limitation, Method 5 of 40 CFR Part 60 Appendix A shall be used.

2. The TPY emission limitations for the combustion of natural gas in the Grain Dryer, emissions unit F004, were taken out at the maximum operating rating and 8760 hours per year. Therefore, no compliance methods need to be spelled out.
3. Compliance with OAC rule 3745-17-07(A)(1) shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(1).
4. Compliance with OAC rule 3745-17-07(B)(1) shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(3).