



## Response to Comments

**Project: Buckeye Ethanol, LLC; Air Permit-to-Install  
Ohio EPA ID #: PTI 07-00579**

### Agency Contacts for this Project

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Ohio EPA held a public hearing on May 29, 2007 regarding a draft air permit-to-install (PTI) for Buckeye Ethanol, LLC. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on May 31, 2007.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

### Comments Received at the Public Hearing

**Comment 1: All comments received at the public hearing on May 29 were in support of the facility and of the draft air PTI.**

**Response 1:** No response is necessary.

### Comments Received in writing from U.S.E.P.A.

**Comment 2: The cover page lists NSPS Db as a facility requirement, but the boilers show NSPS Dc as the NSPS that applies. Is it the Db or the Dc NSPS that applies to the boilers?? Because, if it's the Db NSPS, then the boilers should have CEMS.**

**Response 2:** 40 CFR Part 60, Subpart Dc is the correct rule citation. Subpart Db was added as part of a cover letter by our permit

management unit. The cover letter will be corrected prior to final permit issuance.

**Comment 3:** **There does not seem to be any required emissions testing for NO<sub>x</sub>, CO, and VOC's for the four gas boilers. Seeing that this is a PM<sub>2.5</sub> non-attainment area and NO<sub>x</sub> is a PM<sub>2.5</sub> precursor, this testing should be considered on at least one of the boilers for NO<sub>x</sub> and CO.**

**Response 3:** Prior to final PTI issuance, emission testing language will be added to the four gas boilers, (emissions units B001 - B004.) This language will require testing to be performed on at least one of the boilers to verify the NO<sub>x</sub> and CO emission factors used.

**Comment 4:** **Regarding the "Method 25 or 25A" VOC testing requirements for unit J001- Denatured Ethanol Loading Rack to truck and rail, unit P005 - Mash & Yeast Operations, unit P006 - Fermentation & Beerwell, unit P906 - DDGS Handling & Cooling, and for all other such requirements for "Method 25 or 25A" for other emission units at this facility, it may be best to remove the following language from the permit: "as specified by the Midwest Scaling Protocol". Someone reading the permit may confuse the word "specified" as to mean that the Midwest Scaling Protocol is a requirement of the permit. The Midwest Scaling Protocol is only guidance on how to use existing test methods to derive an accurate VOC number, and is not a EPA-required test method. So, I recommend removing that language from the permit.**

**Response 4:** The phrase "as specified by the Midwest Scaling Protocol" will be revised to "following guidance provided in the Midwest Scaling Protocol".

**Comment 5:** **Regarding the VOC testing requirements mentioned in comment #3, the VOC emissions should be calculated and tested on a total VOC mass basis. One common way of doing this is by using Method 18 and Method 25/25A. This comment also applies to VOC testing on similar emission units at this facility.**

**Response 5:** The reference test methods for VOC for the emissions units listed in comment 4 will be revised as follows:

Method 18, 25 or 25A of 40 CFR Part 60, Appendix A for VOC (following guidance provided in the Midwest Scaling Protocol). 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.

**Comment 6:** **Under the Monitoring and/or Recordkeeping Requirements for unit P001 - Grain Hammermill No. 1, for daily visible emission (VE) checks for the baghouse., the permit currently specifies that the person conducting the check record the date/time/results/corrective action taken for each VE check. This recommendation applies to all of the emission units that require visible emission (VE) checks. It is recommended that the following language be added. "The date and time of the visible emissions check and the presence or absence of any visible emissions shall be noted in an operations log".**

**Response 6:** The VE check language will be revised as follows: "The date and time of the visible emissions check and the presence or absence of any visible emissions shall be noted in an operations log".

**Comment 7:** **Regarding the daily VE check for the hammermill and other emission units, the permit states: "If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident" ,,, etc. In addition, the permittee should record the general time of day of the incident to help determine if there is a pattern of incidents during that general time period on other days.**

**Response 7:** The paragraph cited above was added to the original VE check language to better explain the information to be recorded during a VE check. As such, the revised sentence in Comment 6 above will establish the time of any VE incident observed during a VE check.

**Comment 8:** **If there are several VE incidents, when does the source need to do a Method 9 test?? Because under the Testing Requirements, it says "If required visible particulate emissions from any stack shall not exceed**

**20% opacity",,, etc.". So, when is a Method 9 test required in relation to a VE incident?**

**Response 8:** Ohio EPA has the authority per the Ohio Revised Code to require a Method 9 test whenever we feel a problem exists. This decision is usually made by a field office and is based on observed visible emissions, citizen complaints, company records, company history and any available information we feel is accurate. We would require a Method 9 test to be performed when we believed ongoing problems existed, not just a one-time incident.

**Comment 9:** **Regarding unit P010 - Cooling Towers, the percent drift is stated to be 0.001% loss, however, we believe that the latest drift eliminators now allow 0.0005% loss?**

**Response 9:** The drift eliminators to be employed by Buckeye Ethanol have a percent drift loss of 0.001%, which is more stringent than what we currently consider to be Best Available Technology (0.005%). This is voluntary on the part of the facility to keep particulate emissions below 10 tpy to avoid BAT for emissions unit P010. Therefore, we can not employ Best Available Technology for this emissions unit in accordance with Ohio Revised Code 3704.03(T).

**Comment 10:** **Regarding units P901, P902, and P903 Grain Receiving and Handling: PM testing should be done so that the emission factors can be verified, especially seeing that this is a PM2.5 non-attainment area. Also, it is recommended that bag leak detectors be used to ensure proper use and operation of the baghouses.**

**Response 10:** Language requiring emission testing will be added to emission units P901, P902 and P903.

Concerning the comment on baghouse leak detectors:

Emissions units P901, P902 and P903 include baghouses for control of particulate emissions that keep emissions below 10 tpy. As such, Best Available Technology is not applicable in accordance with Ohio Revised Code 3704.03(T). We cannot require the use of baghouse leak detectors without an applicable rule that gives us the authority.

**Comment 11:**        **Regarding units P904 and P905 - DDGS Loadout: The same general VE comment applies to the baghouses for these emission units, that the daily VE checks should note the presence or absence of visible emissions and also the time of day of the VE check because one can then see if there's a pattern of approximately what time of day the VE incidents occurred.**

**Response 11:**        See the response to Comment 6.

**Comment 12:**        **Also regarding units P904 & P905: It is recommended that bag leak detectors be used to ensure proper use and operation of the baghouses.**

**Response 12:**        See the last paragraph in the response to Comment 10.

**Comment 13:**        **Regarding unit P906 - DDGS Handling & Cooling:**

**As stated previously in comment #3, for the VOC testing, it is recommended to remove the reference to the Midwest Scaling Protocol, and also to ensure that the permit calculate and test for VOC emissions a total VOC mass basis. One common way of doing this, is by using Method 18 and Method 25/25A.**

**It is recommended that bag leak detectors be used to ensure proper use and operation of the baghouses.**

**The general comment regarding the VE checks applies to this emission unit.**

**Response 13:**        See the responses to Comments 4 and 5, the last paragraph in the response to Comment 10 and the response to Comment 6.

**End of Response to Comments**