



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

5/6/2013

Certified Mail

Gerald Lowe  
MARS Horsecare Inc.  
PO BOX 505  
330 E Schultz Ave  
DALTON, OH 44618

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285000002  
Permit Number: P0112452  
Permit Type: Renewal  
County: Wayne

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-NEDO; Canada



PUBLIC NOTICE

5/6/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

MARS Horsecare Inc.  
330 E SCHULTZ AVE,  
DALTON, OH 44618

Wayne County

FACILITY DESC.: Other Animal Food Manufacturing

PERMIT #: P0112452

PERMIT TYPE: Renewal

PERMIT DESC: Renewal permit for a facility that produces animal feed. The facility will be permitted as a FEPTIO for the renewal as the facility was recently reassessed for it's emissions for emission units F001-F005 and P008-P010. The facility has a PTE greater than 100 TPY for PE, thus the federal restrictions.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: John Polak, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (FEPTIO to avoid Title V)

Netting Determination

2. Source Description:

There are thirteen emission units at this facility, F001-F008 and P008-P012, used to unload, load, transfer, mill, mix and bag pet food. Emission units F001, F002, F006, and F008 are fugitive emission units that use enclosures to control emissions. All other emission units are controlled by a cyclone or baghouse.

This permit is for emission units F001-F005, and P008-P010.

Emission units F006-F008 and P011-P012 will be permitted under P0112993 as an initial FEPTIO. These emission units were previously unpermitted and therefore need to be permitted separately at this time.

3. Facility Emissions and Attainment Status:

MARS Horsecare Inc. currently has the potential to emit (PTE) greater than 100 tons of PE/year before controls. In order to restrict the potential to emit below the major source threshold of 100 tons/year, the particulate emissions shall not exceed 0.01 gr/dscf for each baghouse and each cyclone shall not exceed 0.02 gr/dscf operating at the maximum air flow rate (dscf/min) and operating 8760 hours/year. This facility is not one of the source categories listed in OAC rule 3745-77-01(X)(2); therefore, fugitive emissions do not need to be included towards determining the potential to emit. Wayne County is currently in full attainment.

4. Source Emissions:

In order to ensure the requirements of Title V will not apply, the facility has requested to include restrictions on particulate emissions to stay below the major source threshold of 100 tons/year. The facility has requested that each baghouse be restricted to 0.01 grain/dscf of exhaust gases and that each cyclone be restricted to 0.02 grain/dscf of exhaust gases. The potential to emit based on the gr/dscf numbers using the maximum air flow rate for each control device and multiplying by 8760 hours per year results in annual particulate emission of 68.20 tons/year for the entire facility (not just the permitted units in the renewal, P0112452). Stack testing is being required to demonstrate compliance with the new limit. Method 9 readings will also be required during the stack test to demonstrate compliance with the opacity limits for both stack and fugitive emissions for all of the emissions units at this facility. In addition, the permit contains record keeping requirements to track the pressure drop across each baghouse. Quarterly deviation reports are required if deviations occur for the pressure drop.

5. Conclusion:

The potential to emit particulate emissions from F001-F008 and P008-P012 is greater than 100 TPY based on the PTE before controls. In order to restrict the potential to emit below the major source threshold of 100 tons/year, the particulate emissions shall not exceed 0.01 gr/dscf for each baghouse



and each cyclone shall not exceed 0.02 gr/dscf operating at the maximum air flow rate (dscf/min) and operating 8760 hours/year.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u> | <u>Tons Per Year</u>  |
|------------------|-----------------------|
| PE               | 68.20 (Facility-Wide) |



**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
MARS Horsecare Inc.**

|                |                                   |
|----------------|-----------------------------------|
| Facility ID:   | 0285000002                        |
| Permit Number: | P0112452                          |
| Permit Type:   | Renewal                           |
| Issued:        | 5/6/2013                          |
| Effective:     | To be entered upon final issuance |
| Expiration:    | To be entered upon final issuance |





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
MARS Horsecare Inc.

**Table of Contents**

|   |    |
|---|----|
| Authorization .....   | 1  |
| A. Standard Terms and Conditions .....  | 3  |
| 1. What does this permit-to-install and operate ("PTIO") allow me to do?.....   | 4  |
| 2. Who is responsible for complying with this permit? .....   | 4  |
| 3. What records must I keep under this permit? .....  | 4  |
| 4. What are my permit fees and when do I pay them?.....   | 4  |
| 5. When does my PTIO expire, and when do I need to submit my renewal application? .....   | 4  |
| 6. What happens to this permit if my project is delayed or I do not install or modify my source? .....  | 5  |
| 7. What reports must I submit under this permit? .....  | 5  |
| 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? ..... | 5  |
| 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...   | 5  |
| 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....                                   | 6  |
| 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....   | 6  |
| 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....  | 6  |
| 13. Can I transfer this permit to a new owner or operator?.....   | 7  |
| 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....  | 7  |
| 15. What happens if a portion of this permit is determined to be invalid? .....   | 7  |
| B. Facility-Wide Terms and Conditions.....  | 8  |
| C. Emissions Unit Terms and Conditions .....  | 10 |
| 1. Emissions Unit Group -MARS Horsecare Facility: F001,F002,F003,F004,F005,P008,P009,P010 .....   | 11 |





**Draft Permit-to-Install and Operate**

MARS Horsecare Inc.

**Permit Number:** P0112452

**Facility ID:** 0285000002

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0285000002  
Application Number(s): A0045912  
Permit Number: P0112452  
Permit Description: Renewal permit for a facility that produces animal feed. The facility will be permitted as a FEPTIO for the renewal as the facility was recently reassessed for its emissions for emission units F001-F005 and P008-P010. The facility has a PTE greater than 100 TPY for PE, thus the federal restrictions.  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 5/6/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

MARS Horsecare Inc.  
330 E SCHULTZ AVE  
DALTON, OH 44618

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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: P0112452  
 Permit Description: Renewal permit for a facility that produces animal feed. The facility will be permitted as a FEPTIO for the renewal as the facility was recently reassessed for its emissions for emission units F001-F005 and P008-P010. The facility has a PTE greater than 100 TPY for PE, thus the federal restrictions.

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

### Group Name: MARS Horsecare Facility

|                                   |                                      |
|-----------------------------------|--------------------------------------|
| <b>Emissions Unit ID:</b>         | <b>F001</b>                          |
| Company Equipment ID:             | Raw Material Receiving and Transfer  |
| Superseded Permit Number:         | P0086334                             |
| General Permit Category and Type: | Not Applicable                       |
| <b>Emissions Unit ID:</b>         | <b>F002</b>                          |
| Company Equipment ID:             | Grain Receiving and Transfer         |
| Superseded Permit Number:         | P0019840                             |
| General Permit Category and Type: | Not Applicable                       |
| <b>Emissions Unit ID:</b>         | <b>F003</b>                          |
| Company Equipment ID:             | Pellet Line #1                       |
| Superseded Permit Number:         | P0086335                             |
| General Permit Category and Type: | Not Applicable                       |
| <b>Emissions Unit ID:</b>         | <b>F004</b>                          |
| Company Equipment ID:             | Mineral Transfer, Mixing and Bagging |
| Superseded Permit Number:         | P0019842                             |
| General Permit Category and Type: | Not Applicable                       |
| <b>Emissions Unit ID:</b>         | <b>F005</b>                          |
| Company Equipment ID:             | Pet Food Line                        |
| Superseded Permit Number:         | P0086336                             |
| General Permit Category and Type: | Not Applicable                       |
| <b>Emissions Unit ID:</b>         | <b>P008</b>                          |
| Company Equipment ID:             | Jet Pro Process                      |
| Superseded Permit Number:         | P0086337                             |
| General Permit Category and Type: | Not Applicable                       |
| <b>Emissions Unit ID:</b>         | <b>P009</b>                          |
| Company Equipment ID:             | Bird Feed Line/Horse Line            |
| Superseded Permit Number:         | P0086338                             |
| General Permit Category and Type: | Not Applicable                       |
| <b>Emissions Unit ID:</b>         | <b>P010</b>                          |
| Company Equipment ID:             | Pellet Line #2                       |
| Superseded Permit Number:         | P0086339                             |
| General Permit Category and Type: | Not Applicable                       |



**Draft Permit-to-Install and Operate**

MARS Horsecare Inc.

**Permit Number:** P0112452

**Facility ID:** 0285000002

**Effective Date:** To be entered upon final issuance

## **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, Northeast 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.

---

<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.



**Draft Permit-to-Install and Operate**

MARS Horsecare Inc.

**Permit Number:** P0112452

**Facility ID:** 0285000002

**Effective Date:** To be entered upon final issuance

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



**Draft Permit-to-Install and Operate**

MARS Horsecare Inc.

**Permit Number:** P0112452

**Facility ID:** 0285000002

**Effective Date:** To be entered upon final issuance

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.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart DDDDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Prepared Feed Manufacturing Area Sources. Although Ohio EPA has determined that this Generally Available Control TechnologyNESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Draft Permit-to-Install and Operate**

MARS Horsecare Inc.

**Permit Number:** P0112452

**Facility ID:** 0285000002

**Effective Date:** To be entered upon final issuance

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



**1. Emissions Unit Group -MARS Horsecare Facility: F001,F002,F003,F004,F005,P008,P009,P010**

| <b>EU ID</b> | <b>Operations, Property and/or Equipment Description</b>                              |
|--------------|---|
| F001         | Main receiving and transfer   |
| F002         | Grain receiving and distribution  |
| F003         | Pellet Mill #1, Conditioner, Cooler and Bagging                                       |
| F004         | Mineral Receiving, Transfer, Mixing and Associated Bagger                             |
| F005         | Positive air transport system with cyclone. Hammermill, Extruding, Drying and Bagging |
| P008         | heat steam flaked grains and crimped seeds  |
| P009         | Bird feed line/Horse line   |
| P010         | Pellet Mill No. 2 - cooler, screener to bagger  |

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.

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. b)(1)e., d)(1), d)(2), e)(3), f)(1)c., f)(1)d., and f)(1)e.

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 3745-17-07(A)(1)     | See b)(2)a. below.   |
| b. | OAC rule 3745-17-07(B)(1)     | See b)(2)b. below.   |
| c. | OAC rule 3745-17-08(B)        | See b)(2)c. below.   |
| d. | OAC rule 3745-17-08(B)(3)(b)  | The particulate emission limit required by this rule is less stringent than the particulate emission limit established under OAC rule 3745-31-05(D)(1)(b). |



|    | Applicable Rules/Requirements                           | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
| e. | OAC rule 3745-31-05(A)(3), as effective 11/30/01        | The particulate emission limit required by this rule is less stringent than the particulate emission limit established under OAC rule 3745-31-05(D)(1)(b).  |
| f. | OAC rule 3745-31-05(D)(1)(b)<br>FEPTIO to avoid Title V | Particulate emissions shall not exceed 68.20 tons per rolling 12-month period facility-wide, 0.010 gr/dscf from each baghouse for each emissions unit employing a baghouse, and 0.020 gr/dscf from each cyclone for each emissions unit employing a cyclone.<br><br>See b)(2)d. |

(2) Additional Terms and Conditions

- a. Visible particulate emissions from each baghouse or cyclone stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
- b. Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
- c. The permittee shall employ reasonably available control measures (RACM) that shall include the use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit and shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design;
  - ii. at F001:
    - (a) all main unloading operations shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust during the rail car and truck unloading operations;
    - (b) any main loading operation shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust during the drag to trucks and carts loading operations; and
    - (c) all main transfer points shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of



fugitive dust from the grain elevator, gravity feed, and feed to drag operations.

iii. at F002:

- (a) all grain unloading operations shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust during the rail car and truck unloading operations; and
- (b) all grain transfer points shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust from the grain elevator, gravity feed, and feed to drag operations.

iv. at F003:

- (a) all grain and dried feed raw ingredients loading operations shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust during the drag to carts operations;
- (b) all grain and dried feed raw ingredients transfer points shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust from the grain elevators, gravity feed, and feed to drag operations; and
- (c) the pellet cooler shall be equipped with a cyclone.

v. at F004:

- (a) all mineral unloading/loading operations shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust during the truck unloading operations and loading minerals from bins to carts;
- (b) all mineral transfer points shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust from the grain elevators, gravity feed, and feed to drag operations; and
- (c) the mineral mixing operation shall be controlled by a dust collector at all times.

vi. at F005:

- (a) all transfer points on the pet food line shall be adequately enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust from the grain elevators, gravity feed, and feed to drag operations;



- (b) the pet food hammermill shall be controlled by a baghouse;
        - (c) the pet food extruder and dryer shall be controlled by a cyclone at all times; and
        - (d) the Geelen cooler and pet food transfer, shall be controlled by a cyclone at all times.
    - vii. at P008:
      - (a) all transfer points within the Jet Pro cooler and screener process line shall be enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust from the process line; and
      - (b) the Jet Pro, Cooler, and flaked corn bin screener shall be controlled with a cyclone/baghouse at all times.
    - viii. at P009:
      - (a) all transfer points within the bird feed line/horse feed line shall be enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust from the process line;
      - (b) the Scourer shall be controlled with a cyclone/baghouse at all times; and
      - (c) the Rotex/Sifter shall be controlled with a cyclone at all times.
    - ix. at P010:
      - (a) all transfer points within pellet line #2 shall be enclosed so as to minimize or eliminate the generation of visible emissions of fugitive dust from the pellet mill, conditioner, rotex, surge bin, and crumbler; and
      - (b) the Cooler shall be controlled with a cyclone at all times.
  - d. The facility-wide emission limitation of 68.20 tons/year of particulate emissions also includes the following emissions units not listed in this permit: F006, F007, F008, P010, and P012.
- c) Operational Restrictions
    - (1) None.
  - d) Monitoring and/or Recordkeeping Requirements
    - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse/cyclone shall be based upon the manufacturer's specifications, until such time



as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.

- (2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse/cyclone when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse/cyclone on a weekly basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. 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 range specified in this permit, 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:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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



This range or limit on the pressure drop across the baghouse/cyclone is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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 identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving emissions units F001 – F005, and P008 – P010; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse/cyclone was outside of the acceptable range;
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

a. Emission Limitation:

Visible particulate emissions from each baghouse or cyclone stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)(a). Testing shall be performed in accordance with f)(2) below.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). Testing shall be performed in accordance with f)(2) below.

c. Emission Limitation:

The particulate emissions from each baghouse for each emissions unit shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with U.S. EPA Reference Methods 1-5. Testing shall be performed in accordance with f)(2) below.

d. Emission Limitation:

The particulate emissions from each cyclone for each emissions unit shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance shall be determined by stack testing in accordance with U.S. EPA Reference Methods 1-5. Testing shall be performed in accordance with f)(2) below.



e. Emission Limitation:

68.20 tons/year of particulate emissions

Applicable Compliance Method:

Compliance shall be established by combing the following calculations:

For Emission units with a baghouse:

The ton/year limit was established by multiplying the allowable limit of 0.01 gr/dscf by the combined total maximum air flow rate for all of the baghouses (sum the maximum dscf/min for each baghouse) and multiply by 60 minutes/hour, and divide by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.01 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

For emission units with a cyclone:

The ton/year limit was established by multiplying the allowable limit of 0.02 gr/dscf by the combined total maximum air flow rate for all of the baghouses (sum the maximum dscf/min for each baghouse) and multiply by 60 minutes/hour, and divide by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.02 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

(2) The permittee shall conduct emission testing for the largest baghouse/cyclone at this facility in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation (0.01 gr/dscf) for particulates from emissions units with a baghouse and the allowable mass emission limitation (0.02 gr/dscf) for particulates from emissions units with a cyclone.

The emission testing shall also be conducted to demonstrate compliance with both the stack and fugitive opacity limits. The emission testing shall be performed on the largest cyclone and baghouse at the facility (Dryer Cyclone #2/#3 20,000 acfm and Crimped Corn Baghouse 2,124 acfm).

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1 through 5 of 40 CFR Part 60, Appendix A.

Method 9 of 40 CFR Part 60, Appendix A.



The Method 9 readings shall be performed for all of the baghouse stacks at this facility as well as for all of the fugitive egress points (i.e., building windows, doors, roof monitors, etc. for indoor sources and points of capture for outdoor sources) for all of the emissions units at this facility.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirement, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. 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 Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on 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 Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) None.