



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

8/22/2013

Certified Mail

Mr. Ted Slavik
General Mills Cereals Properties, LLC
704 West Washington St.
Chicago, IL 60185

Facility ID: 1431400175
Permit Number: P0111038
County: Hamilton

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 7/2/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Southwest Ohio Air Quality Agency



Response to Comments

Facility ID:	1431400175
Facility Name:	General Mills Cereals Properties, LLC
Facility Description:	Manufacturer of breakfast cereals and snack foods.
Facility Address:	11301 Mosteller Road Cincinnati, OH 45241 Hamilton County
Permit:	P0111038, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 07/05/2013. The comment period ended on 08/04/2013.	
Hearing date (if held)	NA
Hearing Public Notice Date (if different from draft public notice)	NA

The following comments were received during the comment period specified. 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. PDF copies of the original comments in the format submitted are available upon request.

Comments from General Mills, dated 7/29/2013, 8/8/2013, and 8/20/2013:

1. Topic: Section B. Facility-Wide Terms and Conditions

- a. Comment: Insignificant emissions unit P001 should include citation of underlying Permit to Install (PTI) #14-746.

Response: Ohio EPA will agree to make this reference in the permit.

2. Topic: Section C. Terms and Conditions for Emissions Unit P002

- a. Comment: Request that clarifying language be added to term b)(2)b. to reference equipment information contained in PTI application.

Response: Ohio EPA will agree to make changes to the term for clarification and reference to the underlying process information submitted with the PTI applications for P0105832 and P0106380 for this emissions unit.

- b. Comment: Under term d)(1), the second paragraph should refer to the “weekly” check instead of daily. Replace the word “stack” with “control device stack(s)”.



Response: Ohio EPA will agree to correct this wording in the term.

- c. Comment: Under term d)(2), request that the non-integral baghouse ID number “671” be removed from the term to be consistent with baghouse terms for the other emission units in the permit. Request that the wording “non-integral” be added to baghouse description in the 3rd sentence in this term.

Response: Ohio EPA will agree to remove the ID number and correct the wording in the term.

- d. Comment: Under term e)(1)a., request that the wording “non-integral” be added to baghouse description in this term.

Response: Ohio EPA will agree to correct this wording in the term.

- e. Comment: Under term f)(1)a.i., request that PM2.5 be removed from this term to be consistent with terms for emissions unit P029.

Response: Ohio EPA cannot agree to remove PM2.5 since this term, as written, is found in the underlying PTI P0106380 for emissions unit P002 and must be carried over without exclusions into the Title V permit. The underlying PTI language for emissions unit P002 does vary slightly from the underlying PTI language for emissions unit P029.

3. Topic:Section C.Terms and Conditions for Emissions Unit P029

- a. Comment: Request that clarifying language be added to term b)(2)b. to reference equipment information contained in PTI application.

Response: Ohio EPA will agree to make changes to the term for clarification and reference to the underlying process information submitted with the PTI applications for P0105832 and P0106380 for this emissions unit.

- b. Comment: Under term d)(1), the second paragraph should refer to the “weekly” check instead of daily. Replace the word “stack” with “control device stack(s)”.

Response: Ohio EPA will agree to correct this wording in the term.

4. Topic:Section C.Terms and Conditions for Emissions Unit P034

- a. Comment: Request that clarifying language be added to term b)(2)c. to reference equipment information contained in PTI application.

Response: Ohio EPA will agree to make changes to the term for clarification.

- b. Comment: Request that operational flexibility language be added to term b)(2)c. to allow for operation of the emissions unit in certain cases without one or more of the baghouses.

Response: The current underlying PTI P0108118 for emissions unit P034 does not provide for operation of the emissions unit without one or more of the baghouse control devices. Approval of alternative operating scenarios without the use of baghouse controls must occur within the underlying PTI for emissions unit P034 as a request for a PTI modification. Such a request would need to be re-evaluated for compliance with Best Available Technology (BAT) to determine if any emissions increase would occur and if the alternative operating scenarios would satisfy BAT. If it can be demonstrated that the emissions unit would still be in compliance



with the requirements of BAT without one or more of the baghouses in operation, then the alternative operating scenarios would need to be incorporated into the terms and conditions of a final PTI. Therefore, Ohio EPA cannot agree to add the suggested language to this term in the Title V operating permit since it would conflict with the current PTI for emissions unit P034.

- c. Comment: Under term d)(1), the second paragraph should refer to the “weekly” check instead of daily. Replace the word “stack” with “control device stack(s)”.

Response: Ohio EPA will agree to correct this wording in the term.

- d. Comment: Under term f)(1)a.i., request that PM2.5 be removed from this term to be consistent with terms for emissions unit P029.

Response: Ohio EPA will agree to remove the reference to PM2.5 since this term in the underlying PTI P0108118 for emissions unit P034 does not cite PM2.5.

5. Topic:Section C.Terms and Conditions for Emissions Unit P044

- a. Comment: Under term b)(2)b.ii., request that the permit reference be revised to identify the Title V permit if appropriate.

Response: This term should continue to reference the underlying PTI which is the basis for the limitations in the Title V permit. Ohio EPA will add the PTI number to the term to clarify this statement.

6. Topic:Section C.Terms and Conditions for Emissions Unit P046

- a. Comment: Under term e)(2), the authority for term OAC rule citation should be changed to 3745-17-07(A)(1).

Response: Ohio EPA will agree to correct the citation.

7. Topic:Section C.Terms and Conditions for Emissions Units B002 and B003

- a. Comment: Under term f)(1)a., request that the unit of measure in the calculation for fuel oil be corrected and that the AP-42 reference for determining PM10 emissions be added to the term.

Response: Ohio EPA will agree to correct the term and add the AP-42 reference for PM10.

- b. Comment: Under term f)(1)b., request that all the Appendix A test methods for SO2 be listed (6, 6A, 6B, and 6C).

Response: Ohio EPA will agree to add the test methods to the term.

- c. Comment: Under term f)(1)e., request that the cited AP-42 reference tables for fuel oil and natural gas be corrected in this term.

Response: Ohio EPA will agree to correct the table citations.



PRELIMINARY PROPOSED

**Division of Air Pollution Control
Title V Permit
for
General Mills Cereals Properties, LLC**

Facility ID:	1431400175
Permit Number:	P0111038
Permit Type:	Renewal
Issued:	8/22/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
General Mills Cereals Properties, LLC

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Preliminary Proposed Title V Permit

General Mills Cereals Properties, LLC

Permit Number: P0111038

Facility ID: 1431400175

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431400175
Facility Description: Manufacturer of breakfast cereals and snack foods.
Application Number(s): A0044088
Permit Number: P0111038
Permit Description: Renewal Title V permit for the General Mills Cereals Properties LLC facility, a manufacturer of breakfast cereals and snack foods, which includes cereal production lines, material processing systems, a peak shaving generator, and two gas- and oil-fired boilers.
Permit Type: Renewal
Issue Date: 8/22/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0099980

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

General Mills Cereals Properties, LLC
11301 Mosteller Road
Cincinnati, OH 45241

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Southwest Ohio Air Quality Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Preliminary Proposed Title V Permit
General Mills Cereals Properties, LLC
Permit Number: P0111038
Facility ID: 1431400175
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive



measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Southwest Ohio Air Quality Agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official



that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.



- d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))



17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))



20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.



- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 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.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

- a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, 3745-31, and/or 40 CFR Part 60 or 63:

P001 Pneumatic Conveyance and Cleaning Systems [PTI 14-746, issued 5/30/1985]

P045 224 Hp Natural gas/propane-fired emergency generator IC engine (150 kW) [PBR08135]

P901 By-Product Transfer and Loadout [PTI P0107175, issued 12/22/2010]

3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS): B002 and B003. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 60)

4. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule(s) that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, 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 these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

(Authority for term: 40 CFR Part 63)

5. The following abbreviations are used throughout this permit:

NO_x = Nitrogen Oxides

CO = Carbon Monoxide

OC = Organic Compounds

VOC = Volatile Organic Compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM₁₀ = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J



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and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

PM_{2.5} = Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix L and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO₂ = Sulfur dioxide

TPY = Tons per year

mmBtu = million British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code



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C. Emissions Unit Terms and Conditions



1. P002, Cereal Production Line

Operations, Property and/or Equipment Description:

Cereal Production Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) [PTI P0106380, issued 7/14/2010] Best Available Technology (BAT)	PE, PM ₁₀ , and PM _{2.5} emissions shall not exceed 3.79 pounds per hour. The PE/PM ₁₀ /PM _{2.5} emission limitations established in PTI P0106380 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations. See b)(2)a.
b.	OAC rule 3745-31-05(D)	PE, PM ₁₀ , and PM _{2.5} emissions shall not exceed 16.59 TPY. See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to ORC 3704.03(T).

(2) Additional Terms and Conditions

a. Compliance with ORC 3704.03(T) shall be demonstrated by compliance with the emission limitation of 3.79 pounds per hour.



- b. Particulate emissions from the equipment comprising this emissions unit shall be captured and vented to a dust collector or an equivalent control device, as described in the application for PTI #P0105832 and PTI #P0106380, and the equipment shall be capable of complying with the PE/PM₁₀/PM_{2.5} emission limitations established in PTI #P0106380.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the control device stack(s) 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 visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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 under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission 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.

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1))

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the non-integral baghouse during operation of this emissions unit, including periods of startup and shutdown. The



monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the non-integral baghouse on a weekly basis.

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

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

The acceptable range for the pressure drop across the non-integral baghouse is 0.1 to 10.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(T), and OAC rule 3745-31-05(D))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0106380, issued July 14, 2010: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the non-integral baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

- (2) The permittee shall submit annual deviation (excursion) reports that identify the following:
 - a. any time the annual limitation of 16.59 tons PE/PM₁₀/PM_{2.5} per year is exceeded;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

This annual report shall be submitted (i.e., postmarked) by January 31 of each year; and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A)(1), and OAC rule 3745-31-05(D))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0106380, issued July 14, 2010: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.



f) Testing Requirements

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

a. Emission Limitations:

PE, PM₁₀, and PM_{2.5} emissions shall not exceed 3.79 pounds per hour.

PE, PM₁₀, and PM_{2.5} emissions shall not exceed 16.59 TPY.

Applicable Compliance Method:

The PE/PM₁₀/PM_{2.5} short term and annual emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTI #P0106380.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, PM₁₀, and/or PM_{2.5} in the appropriate averaging period(s).

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

Method 5 40 CFR Part 60, Appendix A

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

iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

v. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that



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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.

- vi. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(T), and OAC rule 3745-31-05(D))

- b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0106380, issued July 14, 2010: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

- g) Miscellaneous Requirements

- (1) None.



2. P029, Cereal Production Line

Operations, Property and/or Equipment Description:

Cereal Production Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) [PTI P0106380, issued 7/14/2010] Best Available Technology (BAT)	PE, PM ₁₀ , and PM _{2.5} emissions shall not exceed 3.77 pounds per hour. The PE/PM ₁₀ /PM _{2.5} emission limitations established in PTI P0106380 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations. See b)(2)a.
b.	OAC rule 3745-31-05(D)	PE, PM ₁₀ , and PM _{2.5} emissions shall not exceed 16.53 TPY. See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to ORC 3704.03(T).

(2) Additional Terms and Conditions

a. Compliance with ORC 3704.03(T) requirements shall be demonstrated by compliance with the emission limitation of 3.77 pounds per hour.



- b. Particulate emissions from the equipment comprising this emissions unit shall be captured and vented to a dust collector or an equivalent control device, as described in the application for PTI #P0105832 and PTI #P0106380, and the equipment shall be capable of complying with the PE/PM₁₀/PM_{2.5} emission limitations established in PTI #P0106380.

- c) Operational Restrictions
 - (1) None.

- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the control device stack(s) 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 visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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 under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission 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.

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1))

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the non-integral baghouses during operation of this emissions unit, including periods of startup and shutdown. The



monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the non-integral baghouses on a weekly basis.

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

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

The acceptable range for the pressure drop across the non-integral baghouses is 0.1 to 10.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(T), and OAC rule 3745-31-05(D))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0106380, issued July 14, 2010: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the non-integral baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

- (2) The permittee shall submit annual deviation (excursion) reports that identify the following:
 - a. Any time the annual limitation of 16.53 tons PM/PM₁₀/PM_{2.5} per year is exceeded;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

This annual report shall be submitted (i.e., postmarked) by January 31 of each year; and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A)(1), and OAC rule 3745-31-05(D))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0106380, issued July 14, 2010: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.



f) Testing Requirements

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

a. Emission Limitations:

PE, PM₁₀, and PM_{2.5} emissions shall not exceed 3.77 pounds per hour and 16.53 TPY.

Applicable Compliance Method:

The PE/PM₁₀/PM_{2.5} short term and annual emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTI #P0106380.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE and/or PM₁₀, in the appropriate averaging period(s).
- ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 5 40 CFR Part 60, Appendix A

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

- iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).



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v. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

vi. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and ORC 3704.03(T))

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0106380, issued July 14, 2010: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.



3. P034, Finished Product Conveyance/Packaging System

Operations, Property and/or Equipment Description:

Third Floor Roll Lines Building 5

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 [PTI P0108118, issued 6/6/2011]	PE, PM ₁₀ , and PM _{2.5} emissions shall not exceed 1.25 pounds per hour. The PE/PM ₁₀ /PM _{2.5} emission limitations established in PTI P0108118 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D)	PE, PM ₁₀ , and PM _{2.5} emissions shall not exceed 5.48 TPY. See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this emissions unit since the controlled potential to emit is less than ten tons per year.

- c. Particulate emissions from the equipment comprising this emissions unit shall be captured and vented to a dust collector or an equivalent control device, as described in the application for PTI #P0108118, and the equipment shall be capable of complying with the PE/PM₁₀/PM_{2.5} emission limitations established in PTI # P0108118.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the control device stack(s) 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 visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.



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 under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission 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.

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1))

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the non-integral baghouses during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the non-integral baghouses on a weekly basis.

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

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

The acceptable range for the pressure drop across the non-integral baghouses is 0.1 to 10.0 inches of water.



This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A), and OAC rule 3745-31-05(D))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0108118, issued June 6, 2011: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the non-integral baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A), and OAC rule 3745-31-05(D))

- (2) The permittee shall submit annual deviation (excursion) reports that identify the following:



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- a. Any time the annual limitation of 5.48 tons PE/PM₁₀/PM_{2.5} per year is exceeded;
- b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

This annual report shall be submitted (i.e., postmarked) by January 31 of each year; and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A)(1), and OAC rule 3745-31-05(D))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0108118, issued June 6, 2011: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

PE, PM₁₀, and PM_{2.5} emissions shall not exceed 1.25 pounds per hour.

PE, PM₁₀, and PM_{2.5} emissions shall not exceed 5.48 TPY.

Applicable Compliance Method:

The PE/PM₁₀/PM_{2.5} emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTI # P0108118.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE and/or PM₁₀ in the appropriate averaging period(s).
- ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 5 40 CFR Part 60, Appendix A



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

- iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
- v. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- vi. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and OAC rule 3745-31-05(A)(3))

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



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No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0108118, issued June 6, 2011: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



4. P044, Diesel Generator

Operations, Property and/or Equipment Description:

399 HP Diesel IC Engine for Peak Shaving Generator

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01. [PTI P0112088, issued 1/24/2013] Best Available Technology	NO _x emissions shall not exceed 12.31 pounds per hour. See b)(2)d. PM ₁₀ shall not exceed 0.87 pound per hour and 1.76 TPY. SO ₂ emissions shall not exceed 0.29 pound per mmBtu of actual heat input and 1.64 TPY. CO emissions shall not exceed 0.95 pound per mmBtu of actual heat input and 5.38 TPY. VOC emissions shall not exceed 0.36 pound per mmBtu of actual heat input and 2.04 TPY. See b)(2)a., b)(2)c., c)(1), and c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(C).
b.	OAC rule 3745-31-05(A)(3), as effective 12/1/06. Best Available Technology	NO _x emissions shall not exceed 12.31 pounds per hour. See b)(2)c. and d.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/06.	See b)(2)b.i.
d.	OAC rule 3745-31-05(C), as effective 12/1/06. Voluntary restriction to avoid State-required dispersion modeling (NO _x) Voluntary restriction to avoid Best Available Technology (CO)	NO _x emissions shall not exceed 24.98 TPY. See b)(2)b.ii., c)(1), and c)(2).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
f.	OAC rule 3745-17-11(B)(5)(a)	PE shall not exceed 0.310 pound per mmBtu of actual heat input.
g.	OAC rule 3745-18-06(G)	Exempt, pursuant to OAC rule 3745-18-06(B).
j.	OAC rule 3745-110-02(A) NO _x Reasonably Available Control Technology (RACT)	Exempt, pursuant to OAC rule 3745-110-03(J)(3).

(2) Additional Terms and Conditions

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



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b. These rule paragraphs apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM₁₀, SO₂, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PM₁₀, SO₂, and VOC is less than ten tons per year.

The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions (PE) emitted from this emissions unit (PE is emitted in the form of filterable PM₁₀ emissions). BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a NAAQS has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant without an established NAAQS.

ii. Permit to Install #P0112088 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3) for CO:

(a) The annual fuel usage limitation outlined in c)(1) and c)(2).

c. The short-term emission limitations (pound per hour and pound per mmBtu) outlined above are based upon the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.

d. Pursuant to the provisions of S.B. 265 and since the permittee submitted an air permit to install application before August 3, 2009, for this emissions unit, Ohio EPA evaluated BAT requirements for the pollutant NO_x based upon policies and procedures in effect before August 3, 2009.

c) Operational Restrictions

(1) The maximum annual fuel usage for this emissions unit shall not exceed 80,350 gallons.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

(2) The permittee shall burn only No. 2 fuel oil or diesel fuel in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of fuel used in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

- (2) The permittee shall maintain documentation that the fuel oil used meets the specification of No. 2 fuel oil or diesel fuel.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0112088, issued January 24, 2013: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall identify any exceedance of the annual limitation on the fuel usage for this emissions unit, in an annual report due on February 15 of each year and covering the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

- (2) The permittee shall identify any exceedances of the fuel oil restriction for this emissions unit in an annual report due on February 15 of each year and covering the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0112088, issued January 24, 2013: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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



a. Emission Limitations:

NO_x emissions shall not exceed 12.31 pounds per hour and 24.98 TPY.

Applicable Compliance Method:

Compliance with the hourly emission rate shall be determined by multiplying the emission factor of 4.41 lbs. of NO_x/mmBtu as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96), by the engine rating as follows:

$$(4.41 \text{ lbs of NO}_x/\text{mmBtu}) \times (2.79 \text{ mmBtu/hr}) = 12.31 \text{ lbs. of NO}_x/\text{hr.}$$

Compliance with the annual emission rate shall be determined by multiplying the emission factor of 4.41 lbs. of NO_x/mmBtu as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96), by the maximum heat content of the fuel and fuel usage as follows:

$$[(4.41 \text{ lbs. of NO}_x/\text{mmBtu}) \times (141,000 \text{ Btu/gal}) \times (80,350 \text{ gals/year}) \times (1 \text{ ton}/2000 \text{ lbs.})] / (1,000,000 \text{ Btu/mmBtu}) = 24.98 \text{ TPY of NO}_x.$$

If required, the permittee shall demonstrate compliance with the NO_x emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

b. Emission Limitations:

CO emissions shall not exceed 0.95 pound per mmBtu of actual heat input and 5.38 TPY.

Applicable Compliance Method:

The CO emission rate in lb/mmBtu represents the potential to emit for this emissions unit as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96).

Compliance with the annual CO emission rate shall be determined by multiplying the emission factor of 0.95 lb. of CO/mmBtu as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96), by the maximum heat content of the diesel fuel, then multiplying by the maximum annual fuel usage limitation, then multiplying by 1 ton/2000 lbs and then dividing by 1,000,000.

$$[(0.95 \text{ lb. of CO/mmBtu}) \times (141,000 \text{ Btu/gal}) \times (80,350 \text{ gals/year}) \times (1 \text{ ton}/2000 \text{ lbs.})] / (1,000,000 \text{ Btu/mmBtu}) = 5.38 \text{ TPY of CO.}$$



If required, the permittee shall demonstrate compliance with the CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(C))

c. Emission Limitations:

PM₁₀ emissions shall not exceed 0.87 pound per hour and 1.76 TPY.

Applicable Compliance Method:

The hourly PM₁₀ emission rate shall be determined by multiplying the emission factor of 0.31 lb. of PM₁₀/mmBtu as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96), assuming all PE is PM₁₀, by the engine rating.

$$(0.31 \text{ lb. of PM}_{10}/\text{mmBtu}) \times (2.79 \text{ mmBtu/hr}) = 0.87 \text{ lb. of PM}_{10}/\text{hr.}$$

Compliance with the annual PM₁₀ emission rate shall be determined by multiplying the emission factor of 0.31 lb. of PM₁₀/mmBtu as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96), assuming all PE is PM₁₀, by the maximum heat content of the diesel fuel, then multiplying by the maximum annual fuel usage limitation, then multiplying by 1 ton/2000 lbs and then dividing by 1,000,000.

$$[(0.31 \text{ lb. of PM}_{10}/\text{mmBtu}) \times (141,000 \text{ Btu/gal}) \times (80,350 \text{ gals/year}) \times (1 \text{ ton}/2000 \text{ lbs})]/(1,000,000 \text{ Btu/mmBtu}) = 1.76 \text{ TPY of PM}_{10}.$$

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitations:

SO₂ emissions shall not exceed 0.29 pound per mmBtu of actual heat input and 1.64 TPY.

Applicable Compliance Method:

The SO₂ emission rate in lb/mmBtu represents the potential to emit for this emissions unit as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96).

Compliance with the annual emission rate shall be determined by multiplying the emission factor of 0.29 lb. of SO₂/mmBtu as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96), by the maximum heat content of the diesel fuel, then multiplying by the maximum annual fuel usage limitation, then multiplying by 1 ton/2000 lbs and then dividing by 1,000,000.



$[(0.29 \text{ lb. of SO}_2/\text{mmBtu}) \times (141,000 \text{ Btu/gal}) \times (80,350 \text{ gals/year}) \times (1 \text{ ton}/2000 \text{ lbs})]/(1,000,000 \text{ Btu/mmBtu}) = 1.64 \text{ TPY of SO}_2.$

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitations:

VOC emissions shall not exceed 0.36 pound per mmBtu of actual heat input and 2.04 TPY.

Applicable Compliance Method:

The VOC emission rate in lb/mmBtu represents the potential to emit for this emissions unit as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96).

Compliance with the annual VOC emission rate shall be determined by multiplying the emission factor of 0.36 lb. of VOC/mmBtu as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96), by the maximum heat content of the diesel fuel, then multiplying by the maximum annual fuel usage limitation, then multiplying by 1 ton/2000 lbs and then dividing by 1,000,000.

$[(0.36 \text{ lbs. of VOC/mmBtu}) \times (141,000 \text{ Btu/gal}) \times (80,350 \text{ gals/year}) \times (1 \text{ ton}/2000 \text{ lbs})]/(1,000,000 \text{ Btu/mmBtu}) = 2.04 \text{ TPY of VOC.}$

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.310 pound per mmBtu of actual heat input.

Applicable Compliance Method:

The PE rate in lb/mmBtu represents the potential to emit for this emissions unit as found in AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96). If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(B)(5)(a))



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g. Emission Limitation

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0112088, issued January 24, 2013: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



5. P046, Cereal Production Line - Cereal Systems C and D

Operations, Property and/or Equipment Description:

Cereal Systems C and D

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) g)(1).

- 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.	ORC 3704.03(T) [PTI P0108581, issued 9/20/2011] Best Available Technology	OC emissions shall not exceed an input rate of 0.2 pound per 100 pounds of cereal. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D)	OC emissions shall not exceed 26.1 TPY based on a rolling, 12-month average.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to ORC 3704.03(T).

- (2) Additional Terms and Conditions

- a. PE and PM₁₀ emissions shall not exceed 0.008 grain per standard cubic foot from egress point EQ0405040, 0.004 grain per standard cubic foot from egress point EQ0405050, 0.010 grain per standard cubic foot from egress point EQ0405020, 0.008 grain per standard cubic foot from egress point FF0405210, 0.008 grain per standard cubic foot from egress point WS0404050, 0.008 grain per standard cubic foot from egress point WS0506100, 0.008 grain per standard cubic foot from egress point WS0505100 and 0.008 grain per standard cubic foot from egress point WS0505120.



- b. The OC and PE/PM₁₀ emission limitations established in PTI #P0108581 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the control device stacks 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 visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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 under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission 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.

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1))

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the non-integral baghouse (System C Cooler) during operation of cereal system C in this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated,



operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manual. The permittee shall record the pressure drop, in inches of water, across the non-integral baghouse (System C Cooler) on a weekly basis.

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

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

The acceptable range for the pressure drop across the non-integral baghouse(System C Cooler) is 0.1 to 10.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

- (3) The permittee shall calculate and maintain monthly records of the organic compound emissions and the rolling 12-month emissions of organic compounds.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0108581, issued September 20, 2011: d)(1), d)(2), and d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these



requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the non-integral baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

- (2) The permittee shall submit annual deviation (excursion) reports that identify the following:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
 - c. all exceedances of the rolling, 12-month emission limitation for organic compounds;

This annual report shall be submitted (i.e., postmarked) by January 31 of each year; and shall cover the previous calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(D))



- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0108581, issued September 20, 2011: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitation:

OC emissions shall not exceed an input rate of 0.2 pound per 100 pounds of cereal.

Applicable Compliance Method:

The OC short term emission limitation was based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTI #P0108581.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for OC emissions.
- ii. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate:

Method 2540 CFR Part 60, Appendix A

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

- iii. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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



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result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

- v. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- vi. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

b. Emission Limitation:

OC emissions shall not exceed 26.1 TPY based on a rolling, 12-month average.

Applicable Compliance Method:

Compliance with the annual OC emissions limitation shall be demonstrated by the recordkeeping requirements in d)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

c. Emission Limitations:

PE and PM₁₀ emissions shall not exceed 0.008 grain per standard cubic foot from egress point EQ0405040, 0.004 grain per standard cubic foot from egress point EQ0405050, 0.010 grain per standard cubic foot from egress point EQ0405020, 0.008 grain per standard cubic foot from egress point FF0405210, 0.008 grain per standard cubic foot from egress point WS0404050, 0.008 grain per standard cubic foot from egress point WS0506100, 0.008 grain per standard cubic foot from egress point WS0505100 and 0.008 grain per standard cubic foot from egress point WS0505120.

Applicable Compliance Method:

The PE/PM₁₀ short term emission limitation was based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTI #P0108581.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:



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- i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE and/or PM₁₀.
- ii. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate:

Method 5 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iii. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test.
- v. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- vi. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

d. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.



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Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0108581, issued September 20, 2011: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

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

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-114-01)



6. Emissions Unit Group - 73.7 mmBtu/hr Boilers: B002, B003

EU ID	Operations, Property and/or Equipment Description
B002	73.7 mmBtu/hour natural gas and fuel-oil fired boiler #1
B003	73.7 mmBtu/hour natural gas and fuel-oil fired boiler #2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	See b)(2)c. and c)(4).
b.	OAC rule 3745-31-05(A)(3) [PTI P0106715, issued 11/12/2010] Best Available Technology	See b)(2)a., b)(2)b., c)(1), c)(2), c)(3) and c)(5). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B) and 40 CFR Part 60 Subpart Dc.
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 60, Subpart Dc.
d.	OAC rule 3745-17-10(B)	PE shall not exceed 0.020 lb/mmBtu of actual heat input.
e.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 60 Subpart Dc	See b)(2)d. and b)(2)e.

(2) Additional Terms and Conditions

a. When burning No. 2 fuel oil, the following emission limitations shall not be exceeded:



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- i. CO emissions from each boiler shall not exceed 0.20 lb of CO/mmBtu of actual heat input;
- ii. NO_x emissions from each boiler shall not exceed 0.17 lb of NO_x/mmBtu of actual heat input;
- iii. PE and PM₁₀ emissions from each boiler shall not exceed 0.020 lb of PE and PM₁₀/mmBtu of actual heat input;
- iv. SO₂ emissions from each boiler shall not exceed 0.304 lb of SO₂/mmBtu of actual heat input; and
- v. OC emissions from each boiler shall not exceed 0.0146 lb of OC/mmBtu of actual heat input.

The lb/mmBtu emission limitations for CO, OC, PE/PM₁₀, and NO_x are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- b. When burning only natural gas, the following emission limitations shall not be exceeded:
 - i. CO emissions from each boiler shall not exceed 0.06 lb of CO/mmBtu of actual heat input;
 - ii. NO_x emissions from each boiler shall not exceed 0.08 lb of NO_x/mmBtu of actual heat input;
 - iii. PE and PM₁₀ emissions from each boiler shall not exceed 0.020 lb of PE and PM₁₀/mmBtu of actual heat input;
 - iv. SO₂ emissions from each boiler shall not exceed 0.0006 lb of SO₂/mmBtu of actual heat input; and
 - v. OC emissions from each boiler shall not exceed 0.0146 lb of OC/mmBtu of actual heat input.

The lb/mmBtu emission limitations for CO, OC, PE/PM₁₀, NO_x and SO₂ (for natural gas combustion only) are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- c. The total combined emissions from emissions units B002 and B003 shall not exceed the following limitations based on a rolling 12-month summation:
 - i. CO emissions shall not exceed 37.98 TPY;
 - ii. NO_x emissions shall not exceed 37.79 TPY;
 - iii. PE and PM₁₀ emissions shall not exceed 6.45 TPY;



- iv. SO₂ emissions shall not exceed 40.54 TPY; and
- v. OC emissions shall not exceed 4.71 TPY.
- d. When burning No.2 fuel oil or biodiesel, visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity and except during periods of startup, shut down, or malfunction.
- e. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) The permittee shall operate and maintain low-NO_x burners capable of meeting the NO_x emission limitations specified in b)(2)b. at all times when operating emissions units B002 and B003.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

- (2) The total heat input for emissions units B002 and B003, combined, shall not exceed 73.7 mmBtu/hr which corresponds to a steam load of 60,000 lbs of steam per hour.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

- (3) The quality of the No.2 fuel oil burned in emissions units B002 and B003 shall have a combination of sulfur content and heat content sufficient to comply with the allowable SO₂ emission limitation of 0.304 pound SO₂/mmBtu actual heat input.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

- (4) The total amount of No.2 fuel oil burned in emissions units B002 and B003, combined, shall not exceed 1,900,000 gallons per year based upon a rolling, 12-month summation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D))

- (5) The permittee shall burn only natural gas and/or No.2 fuel oil* in these emissions units.

* The permittee may burn a vegetable oil based fuel (biodiesel) in these emission units under the following conditions:

At least 30-days prior to employing biodiesel as a fuel, the permittee shall submit to the Southwest Ohio Air Quality Agency emission information that demonstrates the use of biodiesel as a fuel will result in compliance with the emission limitations established in PTI P0106715. At a minimum, this request shall detail the following information:



- a. certification that the biodiesel employed meets the specifications for B(100) ASTM D6751-07(b);
- b. a description of all operating scenarios for the fuel (i.e. any mixtures of biodiesel and No.2 fuel oil); and
- c. emissions information for all operating scenarios noted above.

The emission information noted above shall include references to all supporting stack test or fuel analysis used to generate the emission information submitted.

After reviewing the emission information required above, the Southwest Ohio Air Quality Agency will respond in writing to either approve or deny the request for the permittee to employ biodiesel as a fuel. The permittee shall not employ biodiesel as a fuel without receiving prior written approval from the Southwest Ohio Air Quality Agency.

Should the use of biodiesel as a fuel in these emission units result in any physical or operational change that triggers a modification as defined in OAC rule 3745-31-01, the permittee shall submit a Permit to Install application prior to making the modification.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

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

- (1) The permittee shall collect and record the following information on a monthly basis:
 - a. the total amount of No.2 fuel oil or biodiesel burned in emissions units B002 and B003, combined;
 - b. the rolling 12-month summation of the usage totals recorded pursuant to d)(1)a. above, i.e., the current month's total added to the previous 11-month total; and
 - c. the total amount of natural gas burned in emissions units B002 and B003, combined.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

- (2) The permittee shall maintain records of the oil or biodiesel burned in each emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. **Alternative 1:**

For each shipment of oil or biodiesel received for burning in the emissions unit, the permittee shall collect or require the oil or biodiesel supplier to collect a representative grab sample of oil or biodiesel and maintain records of the total quantity of oil or biodiesel received, the permittee's oil or biodiesel supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads



from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil or biodiesel for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil or biodiesel that is burned in the emissions unit for each day when the emissions unit is in operation. If additional fuel oil or biodiesel is added to the tank serving the emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil or biodiesel burned in the emissions unit. A representative grab sample of oil or biodiesel does not need to be collected on days when the emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil or biodiesel burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-18-04(E)(3) and OAC rule 3745-18-04(I))

- (3) For each day during which the permittee burns a fuel other than natural gas and/or No.2 oil and/or biodiesel, the permittee shall maintain a record of the type and quantity of fuel burned in each emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- (4) The permittee shall continuously monitor and record the total combined steam flow for emissions units B002 and B003.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- (5) When burning No.2 fuel oil or biodiesel, the permittee shall comply with the opacity monitoring and record keeping requirements specified in 60.47c and 60.48c.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart Dc)

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0106715, issued November



12, 2010: d)(1), d)(2), d)(3), d)(4), and d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, No.2 oil, and/or approved biodiesel was burned in each emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. No. 2 fuel oil usage limitation of 1,900,000 gallons per year based on a rolling, 12-month summation; and
 - b. Steam flow rate limitation of 60,000 pounds of steam per hour.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- (4) When burning No.2 fuel oil or biodiesel, the permittee shall comply with the opacity reporting requirements specified in 60.48c.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart Dc)

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0106715, issued on November 12, 2010: e)(1), e)(2), e)(3), and e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.



f) Testing Requirements

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

a. Emission Limitations:

PE and PM₁₀ emissions shall not exceed 0.020 lb/mmBtu of actual heat input and 6.45 TPY.

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum natural gas usage rate of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr) multiplied by the percentage of particulate emissions with a diameter less than 10 microns.

Applicable compliance method when burning No. 2 fuel oil:

For the use of fuel oil, compliance may be determined by multiplying the maximum fuel oil usage rate of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 2.0 lbs of filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr). PM₁₀ emissions may be determined by multiplying the percentage of particulate emissions with a diameter less than 10 microns as found in AP-42, Fifth Edition, Section 1.3, Table 1.3-6 (revised 5/10).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb of PE/PM₁₀ per mmBtu limitation specified in b)(1)d. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(1).

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), and OAC rule 3745-77-07(C)(1))

b. Emission Limitations:

SO₂ emissions shall not exceed 0.304 lb of SO₂/mmBtu of actual heat input when burning fuel oil.



SO₂ emissions shall not exceed 0.0006 lb of SO₂/mmBtu of actual heat input when burning natural gas.

SO₂ emissions shall not exceed 40.54 TPY.

Applicable compliance method when burning fuel oil:

Compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emissions rates for all of the shipments of oil received during the calendar month.

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb of SO₂/mm cu. ft and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitations specified in b)(2)a. and b)(2)b. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded pursuant to d)(1).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 6, 6A, 6B, and 6C.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), and OAC rule 3745-18-04(E))

c. Emission Limitations:

NO_x emissions shall not exceed 0.17 lb of NO_x/mmBtu of actual heat input when burning No. 2 fuel oil.

NO_x emissions shall not exceed 0.08 lb of NO_x/mmBtu of actual heat input when burning only natural gas.

NO_x emissions shall not exceed 37.79 TPY.

Applicable compliance method when burning No.2 fuel oil:

For the use of No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 20 lbsNO_x/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).



Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr) by the manufacturer's guaranteed emission factor of 80 lbs of NO_x/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in b)(2)a. and b)(2)b. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(1).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

d. Emission Limitations:

CO emissions shall not exceed 0.20 lb of CO/mmBtu of actual heat input when burning No. 2 fuel oil.

CO emissions shall not exceed 0.06 lb of CO/mmBtu of actual heat input when burning only natural gas.

CO emissions shall not exceed 37.98 TPY.

Applicable compliance method when burning No.2 fuel oil:

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 5 lbs of CO/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr) by the manufacturer's guaranteed emission factor of 60 lbs of CO/mm cu. ft. of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in b)(2)a. and b)(2)b. Should the actual annual emission rate need to be calculated, the annual



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emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(1).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

e. Emission Limitations:

OC emissions shall not exceed 0.0146 lb of OC/mmBtu of actual heat input and 4.71 TPY.

Applicable compliance method when burning No. 2 fuel oil:

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (revised 5/10) emission factor of 0.252 lb of OC/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 11 lbs of OC/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in b)(2)a. and b)(2)b. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(1).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

f. Emission Limitation:

When burning No. 2 fuel oil or biodiesel, visible particulate emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour



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of not more than 27% opacity and except during periods of startup, shutdown and malfunction.

Applicable Compliance Method-

Compliance with the visible particulate emissions limitation shall be determined in accordance with the requirements of 40 CFR 60.45c and 60.47c.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Subpart Dc)

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0106715, issued on November 12, 2010: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.