

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Interim Director

1/22/2014

Certified Mail

Dennis Koshmider  
HOLMES BY-PRODUCTS INC.  
3175 TWP RD 411  
Route 5  
MILLERSBURG, OH 44654

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238000004  
Permit Number: P0110108  
Permit Type: Renewal  
County: Holmes

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
HOLMES BY-PRODUCTS INC.**

Facility ID:	0238000004
Permit Number:	P0110108
Permit Type:	Renewal
Issued:	1/22/2014
Effective:	1/22/2014
Expiration:	1/7/2016





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
HOLMES BY-PRODUCTS INC.

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## Authorization

Facility ID: 0238000004  
Application Number(s): A0044616  
Permit Number: P0110108  
Permit Description: PTIO Renewal permit for rendering processes, sawdust handling system, and grinder/chipper  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/22/2014  
Effective Date: 1/22/2014  
Expiration Date: 1/7/2016  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

HOLMES BY-PRODUCTS INC.  
3175 TWP RD 411  
Millersburg, OH 44654

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

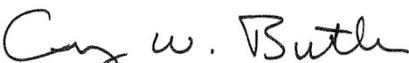
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Interim Director



## Authorization (continued)

Permit Number: P0110108

Permit Description: PTIO Renewal permit for rendering processes, sawdust handling system, and grinder/chipper

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	Grinder/Chipper
Superseded Permit Number:	P0084644
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Sawdust Handling System
Superseded Permit Number:	P0084644
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Feather Rendering
Superseded Permit Number:	P0084644
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Offal Rendering Process no. 1
Superseded Permit Number:	P0084644
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
HOLMES BY-PRODUCTS INC.  
**Permit Number:** P0110108  
**Facility ID:** 0238000004  
**Effective Date:** 1/22/2014

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
HOLMES BY-PRODUCTS INC.  
**Permit Number:** P0110108  
**Facility ID:** 0238000004  
**Effective Date:** 1/22/2014

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
HOLMES BY-PRODUCTS INC.  
**Permit Number:** P0110108  
**Facility ID:** 0238000004  
**Effective Date:** 1/22/2014

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



**1. F001, Grinder/Chipper**

**Operations, Property and/or Equipment Description:**

Grinder/chipper to process wood scraps for sawdust fired boiler.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)	See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-08	The requirements of this rule are not applicable because the emissions unit is located outside an Appendix A area.
c.	OAC rule 3745-17-07(B)(7)(e)	The requirements of this rule are not applicable because the emissions unit is located outside an Appendix A area.

(2) Additional Terms and Conditions

a. Fugitive particulate emissions shall not exceed 2.72 tons per year.

b. Visible particulate emissions shall not exceed 5% opacity from any building opening, as a three-minute average.

c) Operational Restrictions

(1) The permittee shall operate the grinder/chipper only in the building enclosure.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the emissions unit was operated outside the building enclosure.

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the emissions unit was operated outside the building enclosure. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emissions Limitation:

Fugitive particulate emissions shall not exceed 2.72 tons per year.

Applicable Compliance Method:

Compliance with the fugitive particulate emissions limitation shall be the sum of the emissions from the grinder and the chipper and be determined in accordance with the following equation:

$$EPM \text{ (yr)} = [(19,437 \text{ tons/yr}) \times (0.35 \text{ lb/ton wood waste}) \times (1 \text{ ton}/2000 \text{ lbs}) \times (1 - 0.60)] + [(19,437 \text{ tons/yr}) \times (0.35 \text{ lb/ton wood waste}) \times (1 \text{ ton}/2000 \text{ lbs}) \times (1 - 0.60)]$$

Where:

19,437 tons/yr = maximum annual throughput;

0.35 lb/ton wood waste = emission factor from RACM Chapter 2.17, Woodworking, Table 1, sawing; and



**Final Permit-to-Install and Operate**  
HOLMES BY-PRODUCTS INC.  
**Permit Number:** P0110108  
**Facility ID:** 0238000004  
**Effective Date:** 1/22/2014

0.60 = 60% control factor for a three-sided enclosure according to RACM Chapter 2.17, Woodworking, Table 3.

b. Emissions Limitation:

Visible particulate emissions shall not exceed 5% opacity from any building opening, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with U.S. EPA Method 9 (40 CFR Part 60, Appendix A).

g) Miscellaneous Requirements

(1) None.



**2. F002, Sawdust Handling System**

**Operations, Property and/or Equipment Description:**

Sawdust handling; truck unloading, sawdust storage building and sawdust storage silo.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)	See b)(2)a., b)(2)b., and b)(2)c. below.
b.	OAC rule 3745-17-08	The requirements of this rule are not applicable because the emissions unit is located outside an Appendix A area.
c.	OAC rule 3745-17-07(B)(7)(e)	The requirements of this rule are not applicable because the emissions unit is located outside an Appendix A area.

(2) Additional Terms and Conditions

a. Fugitive particulate emissions shall not exceed 14.58 tons per year.

b. There shall be no visible particulate emissions from any sawdust storage pile and the sawdust storage building except for thirteen minutes during any sixty-minute period.

c. Visible particulate emissions shall not exceed 5% opacity as a three-minute average from the sawdust silo vent.



c) Operational Restrictions

- (1) All sawdust shall be stored inside the enclosure.
- (2) The sawdust silo vent shall be controlled by a cyclone or similar device at all times the sawdust silo is loaded or unloaded.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document all time periods when the sawdust piles were stored outside the sawdust storage building.
- (2) The permittee shall maintain daily records that document all time periods when the cyclone was not in service when the emissions unit was in operation.

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the sawdust piles were stored outside the sawdust storage building. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.
- (2) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the cyclone was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

Fugitive particulate emissions shall not exceed 14.58 tons per year.



Applicable Compliance Method:

Compliance with the fugitive particulate emissions limitation shall be the sum of the emissions from the truck unloading, sawdust handling, and the sawdust storage vent silo and be determined in accordance with the following equation:

$$\text{EPM (yr)} = [(19,437 \text{ tons/yr}) \times (1.0 \text{ lb/ton sawdust}) \times (1 \text{ ton}/2000 \text{ lbs})] + [(19,427 \text{ tons/yr}) \times (1.0 \text{ lb/ton sawdust}) \times (1 - 0.60)] + [(19,437 \text{ tons/yr}) \times (1.0 \text{ lb/ton sawdust}) \times (1 \text{ ton}/2000 \text{ lbs}) \times (1 - 0.90)]$$

Where:

19,437 tons/yr = maximum annual throughput;

1.0 lb/ton sawdust = emission factor from RACM Chapter 2.17, Woodworking, Table 1, for sawdust pile loading, unloading, and storage and sawdust storage silo vent;

0.60 = 60% control factor for a three-sided enclosure according to RACM Chapter 2.17, Woodworking, Table 3; and

0.90 = 90% control factor which is the assumed control efficiency for the cyclone controlling the sawdust storage silo vent.

b. Emissions Limitation:

Visible particulate emissions shall not exceed 5% opacity as a three-minute average from the sawdust silo vent.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with U.S. EPA Method 9 (40 CFR Part 60, Appendix A).

c. Emissions Limitation:

There shall be no visible particulate emissions from any sawdust storage pile and the sawdust storage building except for thirteen minutes during any sixty-minute period.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with U.S. EPA Method 9 (40 CFR Part 60, Appendix A).

g) Miscellaneous Requirements

- (1) None.



**3. P001, Feather Rendering**

**Operations, Property and/or Equipment Description:**

Feather rendering batch cooker(s), drier & grinder where gases from the cookers & drier are vented to a condenser, which exhausts to the burner box of a boiler (e.g. B007 & eventually B006) to control odors and organic compound (OC) emissions

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-15-07	See b)(2)a., c)(1), c)(2), and c)(3) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the requirements listed in the Final Findings and Orders of the Director of the Ohio EPA as entered in the Director's Journal August 4, 1994, as modified on December 16, 2005.

c) Operational Restrictions

(1) The permittee shall vent all exhaust gases from the feather rendering process to a condenser.

(2) The permittee shall vent all non-condensable fumes from the feather plant to the boiler's firebox for combustion.



(3) The permittee shall properly operate and use the incineration system so that all fumes from the condenser will be collected, transported, and injected into the boiler firebox for incineration during cooking and drying of the product.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain a feather processing operations log and shall record the following:

- a. All times the condenser is not operating while the emissions unit is in operation;
- b. All times the non-condensable fumes are not collected, transported, and injected into the boiler firebox for incineration; and
- c. The date and results of all maintenance checks of the control devices.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the emissions from the feather rendering process were not controlled by the condenser and boiler firebox while the emissions unit was in operation.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

- a. None.

g) Miscellaneous Requirements

(1) None.



**4. P002, Offal Rendering Process no. 1**

**Operations, Property and/or Equipment Description:**

Offal rendering process no. 1: crusher, mixer, evaporator, separator, condenser and press gases are vented to a condenser, which exhausts to the burner box of a boiler (e.g. B007 or eventually B006).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-15-07	See b)(2)a., and c)(1) through c)(8) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the requirements listed in the Final Findings and Orders of the Director of the Ohio EPA as entered in the Director's Journal August 4, 1994, as modified on December 16, 2005.

c) Operational Restrictions

(1) The permittee shall vent all exhaust gases from the continuous cooker to an adequately sized stainless steel condenser, with the non-condensable fumes vented to the boiler's firebox. The condenser shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).



- (2) The permittee shall utilize localized hooding to capture fugitive fumes from the press and centrifuge and vent the fumes to the boiler's firebox for combustion.
  - (3) The permittee shall operate a fuel feed fan that will vent air from within the continuous cooker building to the boiler's firebox such that there will be approximately four "room changes" per hour in the continuous cooker building.
  - (4) The permittee shall close access doors and windows during routine operations to the extent necessary to ensure that air flow through the building does not interfere with collection of high intensity odors by the fuel feed fan.
  - (5) The permittee shall properly operate and use the incineration system so that all fumes from the condenser will be collected, transported, and injected into the boiler firebox for incineration during the offal rendering process.
  - (6) The permittee shall store all raw materials inside a building unless equipment breakdown occurs or if unusable materials are mistakenly delivered to the site. Raw materials shall be received daily in the outdoor back dock and shall be processed daily.
  - (7) The permittee shall process only fresh materials.
  - (8) The permittee shall clean all processing equipment daily with hot water and disinfectant.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain an offal processing operations log and shall record the following:
    - a. All times the fumes from the cooker and dryers are not controlled by the condenser while the emissions unit is in operation;
    - b. All times the non-condensable fumes from the condenser, press, and centrifuge are not collected, transported, and injected into the boiler firebox for incineration;
    - c. All times the offal rendering building air is not vented to the boiler firebox;
    - d. The date and results of all maintenance checks of the condenser and incineration system;
    - e. All times raw material was stored outside;
    - f. All times product was accepted and processed that was not fresh; and
    - g. All times the processing equipment was not cleaned daily with hot water and disinfectant
- e) **Reporting Requirements**
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the emissions from the offal rendering process (i.e., cooker, dryer,



press, centrifuge, building) were not controlled by the condenser and boiler firebox while the emissions unit was in operation.

- (2) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing the following:
  - a. Raw material was stored outside the building;
  - b. All times product was accepted and processed that was not fresh; and all times the processing equipment was not cleaned daily with hot water and disinfectant.

The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.

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. None.

g) Miscellaneous Requirements

- (1) None.