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

2/6/2014

Certified Mail

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

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285000002
Permit Number: P0116231
Permit Type: Administrative Modification
County: Wayne

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

How to give us feedback on your permitting experience

Please complete a survey at 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 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
MARS Horsecare Inc.

Facility ID:	0285000002
Permit Number:	P0116231
Permit Type:	Administrative Modification
Issued:	2/6/2014
Effective:	2/6/2014
Expiration:	11/18/2018

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

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Authorization

Facility ID:	0285000002
Application Number(s):	M0002594
Permit Number:	P0116231
Permit Description:	This is an Admin Mod to P0112452 due to a typographical error in the final FEPTIO. Emissions unit F003 has an incorrect tpy limit listed in the permit. This is being corrected and is not an actual increase in emissions.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	2/6/2014
Effective Date:	2/6/2014
Expiration Date:	11/18/2018

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

Authorization (continued)

Permit Number: P0116231
Permit Description: This is an Admin Mod to P0112452 due to a typographical error in the final FEPTIO. Emissions unit F003 has an incorrect tpy limit listed in the permit. This is being corrected and is not an actual increase in emissions.

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

Group Name: MARS Horsecare Facility

Emissions Unit ID:	**F001**
Company Equipment ID:	Raw Material Receiving and Transfer
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F002**
Company Equipment ID:	Grain Receiving and Transfer
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F003**
Company Equipment ID:	Pellet Line #1
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F004**
Company Equipment ID:	Mineral Transfer, Mixing and Bagging
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**F005**
Company Equipment ID:	Pet Food Line
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	Jet Pro Process
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	Bird Feed Line/Horse Line
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	Pellet Line #2
Superseded Permit Number:	P0112452
General Permit Category andType:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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.

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

C. Emissions Unit Terms and Conditions

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

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

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

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	See b)(2)a.
b.	OAC rule 3745-17-07(B)(1)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The particulate emission limit required by this rule is less stringent than the particulate emission limit established under OAC rule 3745-31-05(D)(1)(b).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Facility-wide particulate emissions (PE) shall not exceed 68.26 tons per rolling, 12-month period. Control device specific efficiencies must be attained as specified in section b)(2) of this permit. To ensure compliance with the facility-wide PE limitation on a rolling, 12-month basis, the following emissions units contained in this permit shall not exceed the following PE limitations: F003 shall not exceed 9.38 ton per year; F005 shall not exceed 29.02 tons per year; P008 shall not exceed 21.04 tons per year; P009 shall not exceed 2.34 tons per year; and P010 shall not exceed 4.34 tons per year. See b)(2)d and f)(1)e.

(2) Additional Terms and Conditions

a. Visible particulate emissions from each baghouse stack or cyclone stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

b. Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

c. Emissions units shall meet the following specific requirements:

i. for emissions unit F003:

(a) the pellet cooler shall be equipped with a cyclone with a grain loading less than or equal to 0.02 grain per dry standard cubic foot;

ii. for emissions unit F004:

(a) the mineral mixing operation shall be controlled by a dust collector at all times achieving a minimum control efficiency of 99%;

iii. for emissions unit F005:

(a) the pet food hammermill shall be controlled by a baghouse with a grain loading less than or equal to 0.01 grain per dry standard cubic foot;

(b) the pet food extruder and dryer shall be controlled by a cyclone at all times, each with a grain loading less than or equal to 0.02 grain per dry standard cubic foot; and

(c) the Geelen cooler and pet food transfer shall be controlled by a cyclone at all times, each with a grain loading less than or equal to 0.02 grain per dry standard cubic foot;

iv. for emissions unit P008:

(a) the Jet Pro, Cooler, and flaked corn bin screener shall be controlled with a cyclone/baghouse at all times; and

(b) the Jet Pro and Cooler cyclone/baghouses shall each comply with a grain loading less than or equal to 0.02 grain per dry standard cubic foot and the flaked corn bin screener cyclone/baghouse shall comply with a grain loading less than or equal to 0.01 grain per dry standard cubic foot;

v. for emissions unit P009:

(a) the Scourer shall be controlled with a cyclone/baghouse at all times and shall comply with a grain loading less than or equal to 0.01 grain per dry standard cubic foot; and

(b) the Rotex/Sifter shall be controlled with a cyclone at all times achieving a minimum control efficiency of 70%;

vi. for emissions unit P010:

(a) the Cooler shall be controlled with a cyclone at all times with a grain loading less than or equal to 0.02 grain per dry standard cubic foot.

d. The facility-wide PE limitation of 68.26 tons per rolling, 12-month period also includes the following emissions units not listed in this permit: F006, F007, F008, P011 and P012.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse/cyclone shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

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

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in d)(3):

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;

b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving emissions units F001 – F005 and P008 – P010; and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse/cyclone was outside of the acceptable range;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from each baghouse stack or cyclone stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emission limitation from each baghouse stack and cyclone stack shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1)(a).

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

The particulate emissions from each baghouse/cyclone serving the F005 hammermill, the P008 flaked corn bin screener, and the P009 Scourer shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation:

The particulate emissions from each baghouse/cyclone serving F003, the F005 pet food extruder, dryer, and the Geelen cooler and pet food transfer, the P008 Jet Pro and cooler, and P010 shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

e. Emission Limitation:

Facility-wide PE shall not exceed 68.26 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be established by combining the following calculations for each emissions unit with stack emissions:

i. For emissions unit F003:

PE shall not exceed 9.38 tons per year.

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

ii. For emissions unit F004:

PE shall not exceed 0.03 ton per year.

PE (ton/yr) = (maximum annual process weight ton/yr) x (EF lb/ton) x (1/2000 lbs) x (control efficiency)
= (17,520 tons/yr) x (0.12 lb/ton) x (1/2,000 lbs) x (1 - .99)
= 0.01 ton/yr x 3 processes within F004
= 0.03 ton/yr

where:

Maximum annual process weight = 17,520 tons/year;
Low-moisture mineral handling and transfer EF = 0.12 lb/ton (emission factor from AP-42 Table 11.24-2); and
Control efficiency of baghouse = 99%.

iii. For emissions unit F005:

PE shall not exceed 29.02 tons per year.

The ton/year limit was established by multiplying the allowable limit of 0.01 gr/dscf by the maximum air flow rate for the baghouse serving the

hammermill and multiplying by 60 minutes/hour, and then dividing by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour emission rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.01 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

Combined with the above calculation, the ton/year limit includes multiplying the allowable limit of 0.02 gr/dscf by maximum air flow rate for the baghouse serving the pet food extruder and dryer, and the Geelen cooler and pet food transfer and multiply by 60 minutes/hour, and divide by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour emission rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.01 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

iv. For emissions unit P008:

PE shall not exceed 21.04 tons per year.

The ton/year limit was established by multiplying the allowable limit of 0.01 gr/dscf by the maximum air flow rate for the baghouse serving the flaked corn bin screener and multiplying by 60 minutes/hour, and then dividing by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour emission rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.01 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

Combined with the above calculation, the ton/year limit includes multiplying the allowable limit of 0.02 gr/dscf by the maximum air flow rate for the baghouse serving the Jet Pro and cooler and multiplying by 60 minutes/hour, and then dividing by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour emission rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.01 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

v. For emissions unit P009:

PE shall not exceed 2.34 tons per year.

The ton/year limit was established by multiplying the allowable limit of 0.01 gr/dscf by the maximum air flow rate for the baghouse serving the Scourer and multiplying by 60 minutes/hour, and then dividing by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour emission rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is

maintained with the 0.01 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

The above calculation shall be combined with the following for the total PE emissions at P009:

PE from the Rotex/Sifter
PE (ton/yr) = (maximum annual process weight ton/yr) x (EF lb/ton) x (1/2000 lbs) x (control efficiency)
= (43,800 tons/yr) x (0.061 lb/ton) x (1/2000 lbs) x (1 -.70)
= 0.40 ton/yr

where:

Maximum annual process weight = 43,800 tons/yr;
Uncontrolled grain receiving material transfers EF = 0.061 lb/ton (emission factor from AP-42 Table 9.9.1 – 1; and
Control efficiency of baghouse = 99%.

vi. For emissions unit P010:

PE shall not exceed 4.34 tons per year.

The ton/year limit was established by multiplying the allowable limit of 0.02 gr/dscf by the maximum air flow rate for the cyclone and multiplying by 60 minutes/hour, and then dividing by 7000 gr/lb to determine the maximum pound per hour emission rate. The pound per hour emission rate is then multiplied by 8760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is maintained with the 0.02 gr/dscf limit, compliance with the ton/year limit shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.