



4/17/2014

Certified Mail

Mr. James Rudolph
RUDOLPH FOODS
PO BOX 509
LIMA, OH 45802

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: 0302000214
Permit Number: P0116553
Permit Type: Renewal
County: Allen

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, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
RUDOLPH FOODS**

Facility ID:	0302000214
Permit Number:	P0116553
Permit Type:	Renewal
Issued:	4/17/2014
Effective:	4/17/2014
Expiration:	4/17/2024



Division of Air Pollution Control
Permit-to-Install and Operate
for
RUDOLPH FOODS

Table of Contents

Authorization	1
A. Standard Terms and Conditions	5
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	6
2. Who is responsible for complying with this permit?	6
3. What records must I keep under this permit?	6
4. What are my permit fees and when do I pay them?.....	6
5. When does my PTIO expire, and when do I need to submit my renewal application?	6
6. What happens to this permit if my project is delayed or I do not install or modify my source?	7
7. What reports must I submit under this permit?	7
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?	7
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	7
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	8
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	8
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	8
13. Can I transfer this permit to a new owner or operator?.....	9
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	9
15. What happens if a portion of this permit is determined to be invalid?	9
B. Facility-Wide Terms and Conditions.....	10
C. Emissions Unit Terms and Conditions	12
1. Emissions Unit Group -Controlled Super Dryers: P020,P021,P022,P023,P024,P025,P026,P027,P028,P029,P030,P031,P032,.....	13
2. Emissions Unit Group -Small Dryers: P002,P003,P004,P005,P006,P007,P008,P009,P010,P011,P012,P013,P014,P015,P016,P017,P018,P019,.....	17
3. Emissions Unit Group -Super Dryers: P034,P035,P036,.....	21



Final Permit-to-Install and Operate
RUDOLPH FOODS
Permit Number: P0116553
Facility ID: 0302000214
Effective Date: 4/17/2014

Authorization

Facility ID: 0302000214
Application Number(s): A0050292
Permit Number: P0116553
Permit Description: PTIO renewal permit for multiple natural gas-fired raw pork dryers.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/17/2014
Effective Date: 4/17/2014
Expiration Date: 4/17/2024
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RUDOLPH FOODS
4475 BELLEFONTAINE ROAD
Lima, OH 45804

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

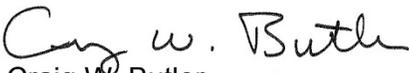
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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
Director



Authorization (continued)

Permit Number: P0116553
 Permit Description: PTIO renewal permit for multiple natural gas-fired raw pork dryers.

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

Group Name: Controlled Super Dryers

Emissions Unit ID:	P020
Company Equipment ID:	Super Dryer 19
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	Super Dryer 20
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	Super Dryer 21
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Super Dryer 22
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	Super Dryer 23
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	Super Dryer 24
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	Super Dryer 25
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	Super Dryer 26
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	Super Dryer 27
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P029
Company Equipment ID:	Super Dryer 28
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	Super Dryer 29
Superseded Permit Number:	P0104734
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031



Company Equipment ID:	Super Dryer 30
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P032
Company Equipment ID:	Super Dryer 31
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable

Group Name: Small Dryers

Emissions Unit ID:	P002
Company Equipment ID:	Small Dryer 1
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Small Dryer 2
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Small Dryer 3
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Small Dryer 4
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Small Dryer 5
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Small Dryer 6
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Small Dryer 7
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Small Dryer 8
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	Small Dryer 9
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	Small Dryer 10
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	Small Dryer 11
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	Small Dryer 12
Superseded Permit Number:	P0104734



General Permit Category andType:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	Small Dryer 13
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	Small Dryer 14
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	Small Dryer 15
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	Small Dryer 16
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Small Dryer 17
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	Small Dryer 18
Superseded Permit Number:	P0104734
General Permit Category andType:	Not Applicable

Group Name: Super Dryers

Emissions Unit ID:	P034
Company Equipment ID:	Super Dryer 32
Superseded Permit Number:	P0108550
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P035
Company Equipment ID:	Super Dryer 33
Superseded Permit Number:	P0108550
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P036
Company Equipment ID:	Super Dryer 34
Superseded Permit Number:	P0108550
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
RUDOLPH FOODS
Permit Number: P0116553
Facility ID: 0302000214
Effective Date: 4/17/2014

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
RUDOLPH FOODS
Permit Number: P0116553
Facility ID: 0302000214
Effective Date: 4/17/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

RUDOLPH FOODS

Permit Number: P0116553

Facility ID: 0302000214

Effective Date: 4/17/2014

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 reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.



Final Permit-to-Install and Operate
RUDOLPH FOODS
Permit Number: P0116553
Facility ID: 0302000214
Effective Date: 4/17/2014

C. Emissions Unit Terms and Conditions



**1. Emissions Unit Group -Controlled Super Dryers:
 P020,P021,P022,P023,P024,P025,P026,P027,P028,P029,P030,P031,P032,**

EU ID	Operations, Property and/or Equipment Description
P020	Super Dryer 19 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P021	Super Dryer 20 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P022	Super Dryer 21 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P023	Super Dryer 22 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P024	Super Dryer 23 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P025	Super Dryer 24 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P026	Super Dryer 25 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P027	Super Dryer 26 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P028	Super Dryer 27 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P029	Super Dryer 28 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P030	Super Dryer 29 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P031	Super Dryer 30 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired
P032	Super Dryer 31 - 3,300 lbs/batch - 1.8 mmBtu/hr natural gas, direct-fired

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)	0.23 lb particulate matter less than 10 microns (PM ₁₀)/hr and 1.01 tons PM ₁₀ /yr individually See b)(2)a. through b)(2)d.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		not exceed 20 percent opacity, as a six-minute average except as provided by rule.
c.	OAC rule 3745-17-11(B)	See b(2)e.

(2) Additional Terms and Conditions

- a. The hourly PM₁₀ emission limitation was established for PTI purposes to reflect the potential to emit for each emissions unit. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements to ensure compliance with this emission limitation.
- b. Emissions of organic compounds (OC) have been determined to be negligible, therefore, no emission limitations or control measures will be established for OC under OAC rule 3745-31-05(A)(3).
- c. All emissions of particulate matter are assumed to be PM₁₀.
- d. Best Available Technology (BAT) control requirements for each emissions unit has been determined to be the use of an add-on mist eliminator achieving a minimum 80 percent control efficiency for particulate matter.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The pressure drop across the mist eliminator for each emissions unit shall be maintained within 0.05-1.5 inches of water while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the mist eliminator while the emissions unit is in operation. 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 across the mist eliminator on a daily basis.
- (2) The permittee shall perform weekly checks, for each emissions unit while it is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each 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 abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - 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 eliminate the visible particulate emissions.

The above information should be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:
0.23 lb PM₁₀/hr individually

Applicable Compliance Method:

The hourly PM₁₀ emissions limitation was established by applying an 80% control efficiency for the use of a mist eliminator to a maximum uncontrolled emissions rate of 1.15 pounds PM₁₀ per hour, as established by the results of emissions testing (October 2004) on a similar unit. If required, the permittee shall demonstrate compliance with the hourly PM₁₀ emission limitation above in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR Part 51, Appendix M.

- b. Emission Limitation:
1.01 tons PM₁₀/yr individually

Applicable Compliance Method:

The annual emission limitation was calculated by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000



lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitations shall also be demonstrated.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group -Small Dryers:
 P002,P003,P004,P005,P006,P007,P008,P009,P010,P011,P012,P013,P014,P015,P016,P017,P018,P019,

EU ID	Operations, Property and/or Equipment Description
P002	Small Dryer 1 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P003	Small Dryer 2 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P004	Small Dryer 3 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P005	Small Dryer 4 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P006	Small Dryer 5 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P007	Small Dryer 6 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P008	Small Dryer 7 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P009	Small Dryer 8 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P010	Small Dryer 9 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P011	Small Dryer 10 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P012	Small Dryer 11 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P013	Small Dryer 12 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P014	Small Dryer 13 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P015	Small Dryer 14 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P016	Small Dryer 15 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P017	Small Dryer 16 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P018	Small Dryer 17 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired
P019	Small Dryer 18 - 1,100 lbs/batch - 400,000 Btu/hr natural gas, direct-fired

- 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)	0.35 lb particulate matter less than 10 microns (PM10/hr) and 1.54 tons PM10/yr individually See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average except as provided by rule.
c.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The hourly PM₁₀ emission limitation was established for PTI purposes to reflect the potential to emit for each emissions unit. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements to ensure compliance with this emission limitation.
- b. The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
- c. All emissions of particulate matter are assumed to be PM10.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, for each emissions unit while it is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each 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 abnormal 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.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - 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 eliminate the visible particulate emissions.

The above information should be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:
0.35lb PM₁₀/hr individually

Applicable Compliance Method:
The hourly PM₁₀ emissions limitation was established in accordance with the results of emissions testing (October 2004) on a similar unit. If required, the permittee shall demonstrate compliance with the hourly PM₁₀ emission limitation above in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR Part 51, Appendix M.
 - b. Emission Limitation:
1.54 tons PM₁₀/yr individually



Applicable Compliance Method:

The annual emission limitation was calculated by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitations shall also be demonstrated.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -Super Dryers: P034,P035,P036,

EU ID	Operations, Property and/or Equipment Description
P034	Natural Gas-Fired Super Dryer - 3,300 lbs/batch
P035	Natural Gas-Fired Super Dryer - 3,300 lbs/batch
P036	Natural Gas-Fired Super Dryer - 3,300 lbs/batch

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), as effective 11/30/01	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/1/06	See b)(2)b.
c.	OAC rule 3745-31-05(F)	0.23 lb particulate matter less than 10 microns in size (PM10)/hr and 1.01 tons PM10/yr individually See b)(2)c. and c)(1)
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average except as provided by rule.
e.	OAC rule 3745-17-11(B)	See b)(2)d.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3), effective 11/30/01 has been determined to the following:
- i. use of an add-on mist eliminator with a design control efficiency of at least 80% control of particulate matter.

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- 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 3745-31-05(A)(3) do not apply to emissions of PM₁₀ because the potential to emit (PTE) for PM₁₀ is less than 10 tons per year taking into consideration the voluntary restriction(s) established under OAC rule 3745-31-05(F).

The potential to emit PM₁₀ for each emissions unit is 1.01 tons PM₁₀/yr and was determined by applying an 80% control efficiency for the use of a mist eliminator to a maximum uncontrolled emissions rate of 1.15 lbs PM₁₀/hr, as established by the results of emissions testing (October 2004,), multiplying by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton.

- c. This permit establishes the following legally and practically enforceable emission limitations. The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restriction contained in c)(1).
- i. 0.23 lb PM₁₀/hr from each emissions unit individually; and
- ii. 1.01 tons PM₁₀/year from each emissions unit individually.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).



c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements [see b)(2)c.):
 - a. use of an add-on mist eliminator with a design control efficiency of at least 80% control of particulate matter.
- (2) The pressure drop across the mist eliminator for each emissions unit shall be maintained with 0.05-1.5 inches of water while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the mist eliminator while the emissions unit is in operation. 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 across the mist eliminator on a daily basis.
- (2) The permittee shall perform weekly checks, for each emissions unit while it is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each 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 abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - 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 eliminate the visible particulate emissions.

The above information should be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:
0.23 lb PM₁₀/hr individually

Applicable Compliance Method:

The hourly PM₁₀ emissions limitation was established by applying an 80% control efficiency for the use of a mist eliminator to a maximum uncontrolled emissions rate of 1.15 pounds PM₁₀ per hour, as established by the results of emissions testing (October 2004) on a similar unit. If required, the permittee shall demonstrate compliance with the hourly PM₁₀ emission limitation above in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR Part 51, Appendix M.

- b. Emission Limitation:
1.01 tons PM₁₀/yr individually

Applicable Compliance Method:

The annual emission limitation was calculated by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitations shall also be demonstrated.

- c. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.