

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

5/6/2014

Certified Mail

TERRY RENNER  
F W RENNER & SONS INC  
PO BOX 20255  
CANTON, OH 44701

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1576000464  
Permit Number: P0100951  
Permit Type: Renewal  
County: Stark

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

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 Canton City Health Department at (330)489-3385 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: Canton



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
F W RENNER & SONS INC**

Facility ID:	1576000464
Permit Number:	P0100951
Permit Type:	Renewal
Issued:	5/6/2014
Effective:	5/6/2014
Expiration:	5/6/2024





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

for  
F W RENNER & SONS INC

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**Final Permit-to-Install and Operate**  
F W RENNER & SONS INC  
**Permit Number:** P0100951  
**Facility ID:** 1576000464  
**Effective Date:** 5/6/2014

## Authorization

Facility ID: 1576000464  
Application Number(s): A0032705, A0049278  
Permit Number: P0100951  
Permit Description: Renewal PTIO for two (2) scrap meat rendering cookers. Emissions controlled by a jet condenser.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/6/2014  
Effective Date: 5/6/2014  
Expiration Date: 5/6/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

F W RENNER & SONS INC  
1866 SHERRICK RD S E  
CANTON, OH 44707

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

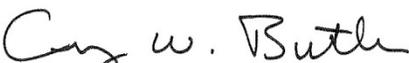
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department  
420 Market Avenue  
Canton, OH 44702-1544  
(330)489-3385

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: P0100951

Permit Description: Renewal PTIO for two (2) scrap meat rendering cookers. Emissions controlled by a jet condenser.

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

**Group Name: Scrap Meat Rendering Cookers**

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Rendering Cooker #1
Superseded Permit Number:	P0074242
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Anco Cooker no. 1 for rendering scrap meat in a batch proces
Superseded Permit Number:	15-01568
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
F W RENNER & SONS INC  
**Permit Number:** P0100951  
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**Effective Date:** 5/6/2014

## **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**  
F W RENNER & SONS INC  
**Permit Number:** P0100951  
**Facility ID:** 1576000464  
**Effective Date:** 5/6/2014

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



**Final Permit-to-Install and Operate**

F W RENNER & SONS INC

**Permit Number:** P0100951

**Facility ID:** 1576000464

**Effective Date:** 5/6/2014

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.



**Final Permit-to-Install and Operate**  
F W RENNER & SONS INC  
**Permit Number:** P0100951  
**Facility ID:** 1576000464  
**Effective Date:** 5/6/2014

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



**1. Emissions Unit Group - Scrap Meat Rendering Cookers: P002 (Dupps Cooker), P003 (Anco Cooker)**

EU ID	Operations, Property and/or Equipment Description
P002	Batch dry inedible rendering process of fresh scrap meat, fat and bones in a 5' X 12' horizontal cylindrical 100 psi steam pressure vessel, maximum process weight rate 6557 pounds of fresh scrap per hour. Exhaust from the Dupps and Anco cookers (containing steam, particulate emissions and emissions of volatile organic compounds) vented to a sequence of emissions control devices, common to both cookers, including a cyclone tank, an air condenser, a jet condenser, a hot well and finally to the fire box of the boiler that provides steam for the cookers, before exiting to the atmosphere from a stack.
P003	Batch dry inedible rendering process of fresh scrap meat, fat and bones in a 5' X 16' horizontal cylindrical 100 psi steam pressure vessel, maximum process weight rate 8100 pounds of fresh scrap per hour. Exhaust from the Dupps and Anco cookers (containing steam, particulate emissions and emissions of volatile organic compounds) vented to a sequence of emissions control devices, common to both cookers, including a cyclone tank, an air condenser, a jet condenser, a hot well and finally to the fire box of the boiler that provides steam for the cookers, before exiting to the atmosphere from a stack.

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) (PTI 15-01568 issued 8/24/2004)  [Best Available Technology, BAT]	Emissions from the stack serving these emissions units shall not exceed the following limits:  1.0 pound of volatile organic compounds



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>(VOC) per hour and 3.3 tons of VOC per year; and            10.5 pounds of particulate emissions (PE) per hour and 46.0 tons of PE per year.</p> <p>BAT requirements for these emissions units shall also include venting emissions from both emissions units, while either is operating, to a combined jet condenser/hot well system, then to the firebox of the boiler that provides steam to the cookers. The gas stream from the jet condenser/hot well system will be introduced into the firebox of the boiler in such a manner as to provide maximum destruction of VOC, within good engineering practice, while providing for inherent operational restrictions of the boiler.</p> <p>See b)(2)(a), b)(2)(c), b)(2)(d), and c)(1) through (3).</p> <p>The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-15-07(A).</p>
b.	<p>OAC rule 3745-15-07(A)</p> <p>[Air Pollution Nuisances Prohibited]</p>	<p>Except as provided in paragraph (B) of this rule, the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance.</p>
c.	<p>OAC rule 3745-17-07(A)(1)</p> <p>[Stack Visible Particulate Emissions]</p>	<p>Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)(1)	The emissions limit from this rule is less stringent than the emissions limit established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The PE emissions limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.
- b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in the process/production capacity, change in the material(s) processed/produced, change in the method of operation or any other change to this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 for any type of air contaminant not previously emitted.
- c. All of the VOC emissions from the emissions units listed above shall be vented to the jet condenser, or comparable device, that shall meet the operational, monitoring and record keeping requirements of this permit, when one or more of the emissions units are in operation.
- d. The permittee shall have installed, operate and maintain the jet condenser/hot well system in accordance with the manufacturer's recommendations and all maintenance, operational and installation documents available from the manufacturer for the control device.

c) Operational Restrictions

- (1) The permittee shall process only fresh scrap at this rendering facility. For the purposes of compliance with the terms and conditions of this permit, fresh scrap is defined as any non-rancid animal parts or byproducts that are processed within the first 24 hour period following receipt at the facility.
- (2) The permittee shall operate only one emissions unit at a time, maintaining the other emissions unit as a backup unit. The jet condenser shall be operated during the operation of and for ten (10) minutes following the shutdown of a cooker emission unit.
- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the water temperature of cooling water discharged from the jet condenser, for any 3-hour block of time, shall be greater than or equal to 120 degrees Fahrenheit, while a cooker is operating.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the date, time and quantity, in pounds, of each shipment of scrap received by the facility and date and time when the processing of each shipment is completed.
- (2) The permittee shall properly install, operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of cooling water discharged from the jet condenser when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when either cooker controlled by the jet condenser was in operation, during which the average temperature of the cooling water discharged from the jet condenser was less than 120 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system, condenser, and monitoring equipment when the associated emissions unit was in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored temperature of the cooling water discharged from the jet condenser deviates from the range/limit 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/limit 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 deviation;
- j. the temperature readings of the cooling water discharged from the jet condenser 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.

The cooling water discharged from the jet condenser temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted condenser cooling water temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the cooling water temperature range/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.

- (4) The permittee shall perform monthly checks, when the emissions unit is in operation and weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible 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 monthly 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 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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any shipment of scrap by date, time and quantity, in pounds, that was not processed within a 24-hour period following receipt at the facility.

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 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).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (4) The permittee shall identify in the annual PER the following information concerning the operations of the jet condenser during the 12-month reporting period for this/these emissions unit(s):
  - a. all 3-hour blocks of time (start time and date, and end time and date), when either cooker controlled by the jet condenser was in operation, during which the average temperature of the cooling water discharged from the jet condenser was less than 120 degrees Fahrenheit;
  - b. any period of time (start time and date, and end time and date), when either cooker controlled by the jet condenser was in operation, the process emissions were not vented to the jet condenser;
  - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the cooling water discharged from the jet condenser into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.



- (5) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(4) 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 minimize or eliminate the visible particulate emissions.

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:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitations:

Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 10.5 pounds per hour and 46.0 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated as follows using the maximum Process Weight Rate of 4.05 tons (8100 pounds) scrap/hour:

$$4.10 \times (P)^{0.67} \times 0.05 =$$

$$4.10 \times (8100/2000)^{0.67} = 10.5 \text{ pounds PE/hour.}$$

Emissions were calculated using Table 1, OAC rule 3745-17-11. Compliance with the ton per year limitation shall be assumed as long as compliance is maintained with the hourly limit (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with the requirements in 40 CFR Part 60, Appendix A, Methods 1- 5 and the procedures specified in OAC rule 3745-17-03(B)(10).



c. Emission Limitation:

Emissions of volatile organic compounds (VOC) from the stack serving this emissions unit shall not exceed 1.0 pound per hour and 3.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum total process weight rate in pounds scrap per hour by an emission factor of 0.47 pound of non-condensable VOC/1000 pounds of scrap processed and the factor of  $(1 - \text{overall control efficiency}/100) = 0.2$ , where the overall control efficiency for VOC is 80%.

The emission factor of 0.47 lbs of non-condensable VOC/1000 lbs scrap processed was derived from worst case conditions established for similar emissions units. USEPA's AP-42, Volume I, Fifth Edition, Section 9.5.3 contained no emission factor data. Information used to develop the emission factor and overall control efficiency were obtained from:

1. Calculation Methodology provided by EHS Technology Group, Holmes By-Products Co., Batch Feather Rendering Process;
2. Chapter 13, Food and Agricultural Industry, "Rendering Plants" section of the 1992 version of the "Air Pollution Control Manual", Air and Waste Management Association, Van Nostrand Reinhold Publishers; and
3. Information provided by the manufacturer of the cooker device to be installed.

Compliance with the ton per year limitation shall be assumed as long as compliance is maintained with the hourly limit (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with this emission limitation and/or verify the overall control efficiency of the control device for VOC emissions through stack testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25/25A.

g) Miscellaneous Requirements

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