



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
PUTNAM COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-3280

DATE: December 15, 1999

Iams Company
Chuck Beckman
3700 State Route 65 North PO Box 87
Leipsic, OH 45856

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: December 15, 1999

FINAL PERMIT TO INSTALL 03-3280

Application Number: 03-3280
APS Premise Number: 0369000037
Permit Fee: **\$2200**
Name of Facility: Iams Company
Person to Contact: Chuck Beckman
Address: 3700 State Route 65 North PO Box 87
Leipsic, OH 45856

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3700 State Route 65 North
Leipsic, Ohio**

Description of proposed emissions unit(s):

TRUCK & RAIL GRAIN UNLOADING, HANDLING & STORAGE AREA.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

Iams CompanyPTI Application: **03-3280****December 15, 1999**Facility ID: **0369000037**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate emissions (PE)	15.4

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
grain unloading (truck and railcar), handling and storage area; unit E1 (modification, see F.1)	OAC rule 3745-31-05	control requirements (see A.2.d) <u>baghouse stack:</u> 0.01 gr/dscf, 0.21 lb particulate emissions (PE)/hr*, 0.90 TPY PE* <u>fugitive emissions:</u> 1.17 TPY PE 5% opacity from grain receiving operations 0% opacity from the baghouse 0% opacity from grain handling/storage operations
	OAC rule 3745-17-11(B)(2)	see A.2.a
	OAC rule 3745-17-07(A)	see A.2.a
	OAC rule 3745-17-08(B)	none (see A.2.b)
	OAC rule 3745-17-07(B)	none (see A.2.c)

*All PE from the baghouse are considered to be PM₁₀

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Emissions Unit ID: **P901**

2. Additional Terms and Conditions

- 2.a** The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
- 2.b** The Iams Company Facility is not located within an "appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements.
- 2.c** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e)
- 2.d** The "Best Available Technology" (BAT) control requirements for emissions unit P901 have been determined to be the following:
- i. Use of a drive-through tunnel (building) with closed overhead door for truck/railcar loading and unloading.
 - ii. Use of appropriate sized grain receiving system to facilitate choke-feed condition for truck/railcar unloading.
 - iii. Use of an aspiration system vented to a baghouse serving the transferring and conveying of grain.
 - iv. Use of telescoping chute for truck/railcar loading.

B. Operational Restrictions

1. The permittee shall keep the overhead door of the drive-through tunnel (building) closed at all times while loading/unloading grain.
2. The permittee shall perform all unloading operations in a manner to maintain a choke-feed condition.
3. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5 inches of water while the emissions unit is in operation.
4. The permittee shall not operate the aspiration system for the whole grain storage silos during grain unloading operations.

5. The maximum annual throughput for emissions unit P901 shall not exceed 58,200 tons of grain.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse 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 baghouse on a daily basis.
2. The permittee shall maintain annual records of the grain throughputs for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit annual reports which identify any exceedances of the annual grain throughput limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The limitation was determined in accordance with the manufacturers guaranteed outlet grain loading. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures in Method 5. Method 5 can be located in 40 CFR Part 60, Appendix A - Method 5.

b. Emission Limitation:

0.21 lb PE/hr, and 0.90 TPY PE from baghouse

Applicable Compliance Method:

The emission limitation was developed by using a baghouse outlet grain loading emission factor (see E.1.a) and maximum volumetric air flow rates. Compliance shall be demonstrated by the monitoring and record keeping specified in section C. If required the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR 60, Appendix A.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

1.17 TPY PE (fugitive)

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by using AP-42, chapter 9.9.1 (5/98) emission factor of 0.035 lb PE/ton handled, the annual grain throughput for this emissions source and a control efficiency of 70% obtained from the use of a 3 sided control structure and creating a choked condition during unloading operations.

d. Emission Limitation:

- i. Visible emissions shall not exceed 5% opacity from grain receiving operations.
- ii. Visible emissions shall not exceed 0% opacity from the baghouse.
- iii. Visible emissions shall not exceed 0% opacity from grain handling operations.

Applicable Compliance Method:

Method 9 of 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

1. This emissions source was previously permitted as K001. This modification was performed to account for fugitive emissions associated with this emissions unit and to correct errors in the

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Emissions Unit ID: **P901**

previous permit to install application #03-10190.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
truck meatmeals and ingredient unloading, handling and storage area; unit E2	OAC rule 3745-31-05	control requirements (see A.2.d) <u>baghouse stack:</u> 0.01 gr/dscf, 0.84 lb particulate emissions (PE)/hr* and 3.68 TPY PE* <u>fugitive emissions:</u> 0.20 TPY PE 0% opacity from unloading operations 0% opacity from baghouse 0% opacity from meatmeal/ingredient handling operations
	OAC rule 3745-17-11(B)(2)	see A.2.a
	OAC rule 3745-17-07(A)	see A.2.a
	OAC rule 3745-17-08(B)	none (see A.2.b)
	OAC rule 3745-17-07(B)	none (see A.2.c)

*All PE from the baghouse are considered to be PM₁₀

2. Additional Terms and Conditions

- 2.a** The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
- 2.b** The Iams Company Facility is not located within an "appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements.
- 2.c** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e)
- 2.d** The "Best Available Technology" (BAT) control requirements for emissions unit P902 have been determined to be the following:
 - i. Use of a drive-through tunnel (building) with closed overhead door for truck/railcar unloading.
 - ii. Use of an aspiration system vented to a baghouse serving the transferring and conveying of meatmeals and ingredients.

B. Operational Restrictions

1. The permittee shall keep the overhead door of the drive-through tunnel (building) closed at all times while unloading meatmeal/ingredients.
2. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5 inches of water while the emissions unit is in operation.
3. The permittee shall not operate the aspiration system for the meatmeal/ingredient storage bins while receiving new shipments of meatmeal/ingredient.
4. The maximum annual throughput for emissions unit P902 shall not exceed 84,850 tons of meatmeal/ingredient.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop

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Emissions Unit ID: **P902**

across the baghouse 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 baghouse on a daily basis.

2. The permittee shall maintain annual records of the meatmeal/ingredient throughputs for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit annual reports which identify any exceedances of the annual meatmeal/ingredient throughput limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The limitation was determined in accordance with the manufacturers guaranteed outlet grain loading. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures in Method 5. Method 5 can be located in 40 CFR Part 60, Appendix A - Method 5.

- b. Emission Limitation:

0.84 lb PE/hr, and 3.68 TPY PE from baghouse

Applicable Compliance Method:

The emission limitation was developed by using a baghouse outlet grain loading emission factor (see E.1.a) and maximum volumetric air flow rates. Compliance shall be demonstrated by the monitoring and record keeping specified in section C. If required the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR 60, Appendix A.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000

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lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

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Emissions Unit ID: **P902**

c. Emission Limitation:

0.20 TPY PE (fugitive)

Applicable Compliance Method:

Compliance with this limit shall be demonstrated by using a company supplied emission factor of 4.75^{-03} lb fugitive emissions per ton handled and a maximum throughput of 84,850 TPY.

d. Emission Limitation:

- i. Visible emissions shall not exceed 0% opacity from grain receiving operations.
- ii. Visible emissions shall not exceed 0% opacity from the baghouse.
- iii. Visible emissions shall not exceed 0% opacity from grain handling operations

Applicable Compliance Method:

Method 9 of 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
line #1 extruding, drying, cooling and material handling, utilizing cyclones; unit E14	OAC rule 3745-31-05	0.70 lb particulate emissions (PE)/hr, and 3.1 TPY PE
		10% opacity, as a 3-minute average
	OAC rule 3745-17-11(B)(2)	see A.2.a
	OAC rule 3745-17-07(A)	see A.2.a

2. Additional Terms and Conditions

- 2.a The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The pressure drop across the cyclones shall be maintained within the range of * inches of water while the emissions unit is in operation.
 - * Not more than 180 days following the issuance of this permit, the permittee shall notify the Ohio EPA in writing of the pressure drop across the triple cyclone. The permittee shall operate the cyclone in accordance with these reported values.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop

across the cyclones 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 cyclone on a per shift basis.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the cyclone did not comply with the allowable range specified above.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.70 lb PE/hr, and 3.1 TPY PE

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation based upon the results of the stack testing specified in section E.2 of the terms and conditions of this permit.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation:

10% opacity, as a 3 minute average

Applicable Compliance Method:

Method 9, 40 CFR Part 60, Appendix A

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in

accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months of the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate for PE: Method 5 of 40 CFR Part 60, Appendix A.
 - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
line #2 extruding, drying, cooling and material handling, utilizing cyclones, unit E14	OAC rule 3745-31-05	0.70 lb particulate emissions (PE)/hr, and 3.1 TPY PE
		10% opacity, as a 3-minute average
	OAC rule 3745-17-11(B)(2)	see A.2.a
	OAC rule 3745-17-07(A)	see A.2.a

2. **Additional Terms and Conditions**

- 2.a The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The pressure drop across the cyclones shall be maintained within the range of * inches of water while the emissions unit is in operation.
 - * Not more than 180 days following the issuance of this permit, the permittee shall notify the Ohio EPA in writing of the pressure drop across the triple cyclone. The permittee shall operate the triple cyclone in accordance with these reported values.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop

across the cyclones 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 cyclone on a per shift basis

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the cyclone did not comply with the allowable range specified above.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.70 lb PE/hr, and 3.1 TPY PE

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation based upon the results of the stack testing specified in section E.2 of the terms and conditions of this permit

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation:

10% opacity, as a 3 minute average

Applicable Compliance Method:

Method 9, 40 CFR Part 60, Appendix A

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in

accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months of the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for PE: Method 5 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
product bin storage with aeration system; unit E18 A&B	OAC rule 3745-31-05	<u>from aeration system stack:</u> 0.74 lb particulate emissions (PE) /hr, and 3.2 TPY PE 0% opacity
	OAC rule 3745-17-11(B)(2)	none (see A.2.a)
	OAC rule 3745-17-07(A)	none (see A.2.a)

2. Additional Terms and Conditions

- 2.a The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

None.

D. Reporting Requirements

None.

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E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.74 lb PE/hr, and 3.3 TPY PE

- Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation based upon a company supplied estimated average emission concentration of 0.008 gr/cfm and a flow rating of 10,800 cfm total from the eight product storage bins. If required, compliance with the particulate emission limitation shall be determined in accordance with the test method and procedures in 40 CFR 60, Appendix A, Method 5.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

F. Miscellaneous Requirements

None.