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Facility Name: **General Mills, Inc.**

Application Number: **04-1125**

Date: **(Date will be entered upon final issuance)**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code

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(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 cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **General Mills, Inc.** located in **Lucas** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA
Source
No.

P035
(cont'd)

P011

P041

P014 (cont'd) P035

P042 (cont'd)

P042

P014 P032

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
<u>Source</u> <u>Identifi</u> <u>cation/</u> <u>Descript</u> <u>ion</u>	and separator with fabric filter and wet collector	finished cereal dryer and separator with fabric filter and wet collector		
System #1 finished cereal dryer and separato r with fabric filter and wet collecto r				
	System #3 pellet dryer	System #5 vitamin enrober with wet collector		
System #2 finished cereal dryer	System #4	System #5 finished cereal dryer		

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mas Emissions and/or Control/Usage Requirements
<u>BAT Determination</u>	Compliance with the Ohio EPA Air Toxics Policy.	non-photoch emically reactive flavorings. Compliance with the Ohio EPA Air Toxics Policy.	No control for PM; non-photochemically reactive flavorings. Compliance with the Ohio EPA Air Toxics Policy.	
				No control for PM
			Wet collector	
	Fabric filter for cooling section of dryer; wet collector for air separator; non-photochemic ally reactive flavorings. Fabric filter for cooling section of dryer; wet collector for air separator;			

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	BAT <u>Determination</u>	Applicable Federal & OAC Rules	Permit Allowable Mas Emissions and/or Control/Usage <u>Requirements</u>
Applicable Federal and <u>OAC Rules</u>				
3745-31-05				
			3745-17-07 3745-17-11 3745-21-07	
	3745-17-07 3745-17-11 3745-21-07		3745-31-05	
	3745-31-05			3745-17-07 3745-17-11 3745-21-07
3745-17-07 3745-17-11 3745-21-07				
3745-31-05	3745-17-07 3745-17-11		3745-17-07 3745-17-11	
	3745-31-05		3745-31-05	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mas Emissions and/or Control/Usage Requirements</u>
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* Limits established in previous Permits To Install. Listed here for historical purposes.

** This limit is less stringent than, or equivalent to, the limit established by OAC 3745-31-05.

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>POLLUTANT</u>	<u>TONS/YR</u>	<u>TONS/YR INCREASE</u>
PM	32.92	16.22
OC	90.0	90.0

CONSTRUCTION STATUS

The **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **P011, P014, P032, P035, P041 and P042.**

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

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REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.**

Except as provided by OAC Rule 3745-15-06(A) (3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C) (4) (b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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CONSTRUCTION COMPLIANCE CERTIFICATION

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.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

SYSTEM #1 FINISHED CEREAL DRYER AND SEPARATOR (P011)

A. Operational Restrictions

1. The pressure drop across the collector shall be maintained at a value of not less than 1.5 inches of water at all times while the emissions unit is in operation.
2. The collector water flow rate shall be maintained at a value of not less than 10 gallons per minute at all times while the emissions unit is in operation.
3. The pressure drop across the baghouse shall be maintained within the range of 1.5 to 6 inches of water while the emissions unit is in operation except during startup after new bag installation.
4. Only non-photochemically reactive flavorings shall be applied in this emissions unit.
5. Flavoring usage shall not result in an exceedance of the following emission limitations and/or control requirements:
 - a. The permittee shall not employ more than 90 tons of OC per rolling 12 month period based upon the summation of monthly OC usage rates* for emission units P011, P014, P035 and P042 combined (the permittee has sufficient records to demonstrate compliance over the past 12 months).

* Summation of monthly OC usage rate = (C x D)
where C = the number of pounds of each flavoring employed per month and D = the pounds of OC per pound of flavoring employed. Monthly OC usage rates are equivalent to monthly OC emission rates and are based upon 100% of the OC in the flavoring being emitted.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the

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operating hours for this emissions unit.

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2. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the collector and the collector water flow rate 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).
3. The permittee shall collect and record the following information once each week while the emissions unit is operating for production:
 - a. The pressure drop across the collector, in inches of water;
 - b. The collector water circulation rate, in gallons per minute.
4. 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).
5. The permittee shall collect and record the following information once each week while the emissions unit is operating for production:
 - a. The pressure drop across the baghouse, in inches of water or psi.
6. The permittee shall collect and record the operating times for the capture (collection) system(s), control device(s), monitoring equipment and emissions unit while the emissions unit is operating for production.
7. The permittee shall maintain formulation records of all flavorings applied in this emissions unit to ensure that they are not photochemically reactive.
8. The permittee shall collect and record the following information each month for the flavorings applied in this emissions unit:

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- a. The company identification for each flavoring employed.
- b. The number of pounds of each flavoring as employed.
- c. The organic compound content of each flavoring, in pounds OC per pound of flavoring.
- d. The monthly average summation of the OC emissions in lbs/hr as calculated in (D)(1)(c).
- e. The rolling 12-month summation of the OC emissions in tons as calculated in (D)(1)(d).

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following collector parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the collector.
 - b. The collector water flow rate.
2. 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.
3. The permittee shall submit reports that identify all periods of time during which photochemically reactive flavorings were applied in this emissions unit and/or the emissions of organic compounds exceeded 20.5 lbs/hr for P011 or 90 tons/rolling 12-month period combined for P011, P014, P035 and P042.
4. The reports for 1a, 1b, 2 and 3 above shall be submitted to the Toledo Division of Environmental Services by Jan. 31, April 30, July 31 and Oct. 31 of each year.

D. Testing Requirements

1. Compliance with the emission limitation(s) of these

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terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation - 1.63 lbs/hr PM.
Applicable Compliance Method - The permittee shall use an emission factor of 0.11 lb PM/ton of product obtained from General Mills historic records and multiply by the cereal production in tons per hour. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for determining PM emissions.
- b. Emission Limitation - 7.14 tons PM/yr.
Applicable Compliance Method - Compliance with (D)(1)(a) will be considered adequate demonstration of compliance.
- c. Emission Limitation - 20.5 lbs/hr OC as a volume-weighted average.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P011 by their appropriate OC content (lbs OC/lb flavoring). The results shall be divided by the hours of operation per month for this emissions unit. If that number is less than 20.5 lbs/hr OC, the source is in compliance with the emission limitation.
- d. Emission Limitation - 90 tons OC/rolling 12-month period combined for P011, P014, P035 & P042.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P011, P014, P035 & P042 by their appropriate OC content (lbs OC/lb flavoring). The lbs/month OC for each emissions unit shall be totaled to determine the total lbs/month OC for P011, P014, P035 & P042 combined. The lbs/month OC for each calendar month shall be added to the lbs/month for the previous 11 months and divided by 2000 lbs/ton. If this annual total is less than 90 tons/rolling 12-month period, the combined sources are in compliance with the emission limitation.

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- e. Emission Limitation - 20% opacity as a 6 minute average except as provided by rule.
Applicable Compliance Method - Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
2. The test method which must be employed to demonstrate compliance with photochemical reactivity is the definition of photochemically reactive material in OAC rule 3745-21-01.

E. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ethyl alcohol

TLV (ug/m3): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 117.3 OC total for P011, P014, P035 & P042

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,230

MAGLC (ug/m3): 44,762

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to

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be a "modification":

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- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
3. Deviations in the pressure drop across the collector, collector water flow rate or pressure drop across the baghouse specified in A.1. to A.3. is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations.

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SYSTEM #2 FINISHED CEREAL DRYER AND SEPARATOR (P014)

A. Operational Restrictions

1. The pressure drop across the collector shall be maintained at a value of not less than 1.5 inches of water at all times while the emissions unit is in operation.
2. The collector water flow rate shall be maintained at a value of not less than 10 gallons per minute at all times while the emissions unit is in operation.
3. The pressure drop across the baghouse shall be maintained within the range of 1.5 to 6 inches of water while the emissions unit is in operation except during startup after new bag installation.
4. Only non-photochemically reactive flavorings shall be applied in this emissions unit.
5. Flavoring usage shall not result in an exceedance of the following emission limitations and/or control requirements:
 - a. The permittee shall not employ more than 90 tons of OC per rolling 12 month period based upon the summation of monthly OC usage rates* for emission units P011, P014, P035 and P042 combined (the permittee has sufficient records to demonstrate compliance over the past 12 months).

* Summation of monthly OC usage rate = (C x D)
where C = the number of pounds of each flavoring employed per month and D = the pounds of OC per pound of flavoring employed. Monthly OC usage rates are equivalent to monthly OC emission rates and are based upon 100% of the OC in the flavoring being emitted.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the operating hours for this emissions unit.

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2. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the collector and the collector water flow rate 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).
3. The permittee shall collect and record the following information once each week while the emissions unit is operating for production:
 - a. The pressure drop across the collector, in inches of water;
 - b. The collector water circulation rate, in gallons per minute.
4. 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).
5. The permittee shall collect and record the following information once each week while the emissions unit is operating for production:
 - a. The pressure drop across the baghouse, in inches of water or psi.
6. The permittee shall collect and record the operating times for the capture (collection) system(s), control device(s), monitoring equipment and emissions unit while the emissions unit is operating for production.
7. The permittee shall maintain formulation records of all flavorings applied in this emissions unit to ensure that they are not photochemically reactive.
8. The permittee shall collect and record the following information each month for the flavorings applied in this emissions unit:

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- a. The company identification for each flavoring employed.
- b. The number of pounds of each flavoring as employed.
- c. The organic compound content of each flavoring, in pounds OC per pound of flavoring.
- d. The monthly average summation of the OC emissions in lbs/hr as calculated in (D) (1) (c).
- e. The rolling 12-month summation of the OC emissions in tons as calculated in (D) (1) (d).

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following collector parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the collector.
 - b. The collector water flow rate.
2. 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.
3. The permittee shall submit reports that identify all periods of time during which photochemically reactive flavorings were applied in this emissions unit and/or the emissions of organic compounds exceeded 20.5 lbs/hr for P014 or 90 tons/rolling 12-month period combined for P011, P014, P035 and P042.
4. The reports for 1a, 1b, 2 and 3 above shall be submitted to the Toledo Division of Environmental Services by Jan. 31, April 30, July 31 and Oct. 31 of each year.

D. Testing Requirements

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

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- a. Emission Limitation - 1.3 lbs/hr PM.
Applicable Compliance Method - The permittee shall use an emission factor of 0.17 lb PM/ton of product obtained from General Mills historic records and multiply by the cereal production in tons per hour. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for determining PM emissions.
- b. Emission Limitation - 5.7 tons PM/yr.
Applicable Compliance Method - Compliance with (D) (1) (a) will be considered adequate demonstration of compliance.
- c. Emission Limitation - 20.5 lbs/hr OC as a volume-weighted average.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P014 by their appropriate OC content (lbs OC/lb flavoring). The results shall be divided by the hours of operation per month for this emissions unit. If that number is less than 20.5 lbs/hr OC, the source is in compliance with the emission limitation.
- d. Emission Limitation - 90 tons OC/rolling 12-month period combined for P011, P014, P035 & P042.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P011, P014, P035 & P042 by their appropriate OC content (lbs OC/lb flavoring). The lbs/month OC for each emissions unit shall be totaled to determine the total lbs/month OC for P011, P014, P035 & P042 combined. The lbs/month OC for each calendar month shall be added to the lbs/month for the previous 11 months and divided by 2000 lbs/ton. If this annual total is less than 90 tons/rolling

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12-month period, the combined sources are in compliance with the emission limitation.

- e. Emission Limitation - 20% opacity as a 6 minute average except as provided by rule.
Applicable Compliance Method - Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
2. The test method which must be employed to demonstrate compliance with photochemical reactivity is the definition of photochemically reactive material in OAC rule 3745-21-01.

E. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ethyl alcohol

TLV (ug/m3): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 117.3 OC total for P011, P014, P035 & P042

Predicted 1-Hour Maximum Ground-Level Concentration

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(ug/m3): 12,230

MAGLC (ug/m3): 44,762

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
3. Deviations in the pressure drop across the collector, collector water flow rate or pressure drop across the baghouse specified in A.1. to A.3. is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations.

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SYSTEM #3 PELLETT DRYER (P032)

A. Operational Restrictions

There are no operational restrictions

B. Monitoring and/or Recordkeeping Requirements

There are no monitoring and/or recordkeeping requirements.

C. Reporting Requirements

There are no reporting requirements.

D. Testing Requirements

Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation - 1.5 lbs/hr PM.
Applicable Compliance Method - The permittee shall use an emission factor of 0.13 lb PM/ton of product obtained from General Mills historic records and multiply by the cereal production in tons per hour. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for determining PM emissions.
2. Emission Limitation - 6.6 tons PM/yr.
Applicable Compliance Method - Compliance with (D) (1) will be considered adequate demonstration of compliance.
3. Emission Limitation - 20% opacity as a 6 minute average except as provided by rule.
Applicable Compliance Method - Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

E. Miscellaneous Requirements

There are no miscellaneous requirements.

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SYSTEM #4 FINISHED CEREAL DRYER AND SEPARATOR (P035)

A. Operational Restrictions

1. The pressure drop across the collector shall be maintained at a value of not less than 1.5 inches of water at all times while the emissions unit is in operation.
2. The collector water flow rate shall be maintained at a value of not less than 7 gallons per minute at all times while the emissions unit is in operation.
3. The pressure drop across the baghouse shall be maintained within the range of 1.5 to 6 inches of water while the emissions unit is in operation except during startup after new bag installation.
4. Only non-photochemically reactive flavorings shall be applied in this emissions unit.
5. Flavoring usage shall not result in an exceedance of the following emission limitations and/or control requirements:
 - a. The permittee shall not employ more than 90 tons of OC per rolling 12 month period based upon the summation of monthly OC usage rates* for emission units P011, P014, P035 and P042 combined (the permittee has sufficient records to demonstrate compliance over the past 12 months).

* Summation of monthly OC usage rate = (C x D)
where C = the number of pounds of each flavoring employed per month and D = the pounds of OC per pound of flavoring employed. Monthly OC usage rates are equivalent to monthly OC emission rates and are based upon 100% of the OC in the flavoring being emitted.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the operating hours for this emissions unit.
2. The permittee shall properly install, operate and

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maintain equipment to monitor the static pressure drop across the collector and the collector water flow rate

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).

3. The permittee shall collect and record the following information once each week while the emissions unit is operating for production:
 - a. The pressure drop across the collector, in inches of water;
 - b. The collector water circulation rate, in gallons per minute.
4. 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).
5. The permittee shall collect and record the following information once each week while the emissions unit is operating for production:
 - a. The pressure drop across the baghouse, in inches of water or psi.
6. The permittee shall collect and record the operating times for the capture (collection) system(s), control device(s), monitoring equipment and emissions unit while the emissions unit is operating for production.
7. The permittee shall maintain formulation records of all flavorings applied in this emissions unit to ensure that they are not photochemically reactive.
8. The permittee shall collect and record the following information each month for the flavorings applied in this emissions unit:

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- a. The company identification for each flavoring employed.
- b. The number of pounds of each flavoring as employed.
- c. The organic compound content of each flavoring, in pounds OC per pound of flavoring.
- d. The monthly average summation of the OC emissions in lbs/hr as calculated in (D) (1) (c).
- e. The rolling 12-month summation of the OC emissions in tons as calculated in (D) (1) (d).

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following collector parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the collector.
 - b. The collector water flow rate.
2. 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.
3. The permittee shall submit reports that identify all periods of time during which photochemically reactive flavorings were applied in this emissions unit and/or the emissions of organic compounds exceeded 55.8 lbs/hr for P035 or 90 tons/rolling 12-month period combined for P011, P014, P035 and P042.
4. The reports for 1a, 1b, 2 and 3 above shall be submitted to the Toledo Division of Environmental Services by Jan. 31, April 30, July 31 and Oct. 31 of each year.

D. Testing Requirements

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

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- a. Emission Limitation - 1.25 lbs/hr PM.
Applicable Compliance Method - The permittee shall use an emission factor of 0.09 lb PM/ton of product obtained from General Mills historic records and multiply by the cereal production in tons per hour. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for determining PM emissions.
- b. Emission Limitation - 5.48 tons PM/yr.
Applicable Compliance Method - Compliance with (D) (1) (a) will be considered adequate demonstration of compliance.
- c. Emission Limitation - 55.8 lbs/hr OC as a volume-weighted average.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P035 by their appropriate OC content (lbs OC/lb flavoring). The results shall be divided by the hours of operation per month for this emissions unit. If that number is less than 55.8 lbs/hr OC, the source is in compliance with the emission limitation.
- d. Emission Limitation - 90 tons OC/rolling 12 month period combined for P011, P014, P035 & P042.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P011, P014, P035 & P042 by their appropriate OC content (lbs OC/lb flavoring). The lbs/month OC for each emissions unit shall be totaled to determine the total lbs/month OC for P011, P014, P035 & P042 combined. The lbs/month OC for each calendar month shall be added to the lbs/month for the previous 11 months and divided by 2000 lbs/ton. If this annual total is less than 90 tons/rolling 12-month period, the combined sources are in compliance with the emission limitation.
- e. Emission Limitation - 20% opacity as a 6 minute average except as provided by rule.
Applicable Compliance Method - Compliance shall be

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determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. The test method which must be employed to demonstrate compliance with photochemical reactivity is the definition of photochemically reactive material in OAC rule 3745-21-01.

E. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ethyl alcohol

TLV (ug/m3): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 117.3 OC total for P011, P014, P035 & P042

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,230

MAGLC (ug/m3): 44,762

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the

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following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

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- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
3. Deviations in the pressure drop across the collector, collector water flow rate or pressure drop across the baghouse specified in A.1. to A.3. is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations.

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SYSTEM #5 VITAMIN ENROBER (P041)

A. Operational Restrictions

1. The pressure drop across the collector shall be maintained at a value of not less than 1.5 inches of water at all times while the emissions unit is in operation.
2. The collector water flow rate shall be maintained at a value of not less than 4 gallons per minute at all times while the emissions unit is in operation.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the static pressure drop across the collector and the collector water flow rate 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).
2. The permittee shall collect and record the following information once each week while the emissions unit is operating for production:
 - a. The pressure drop across the collector, in inches of water;
 - b. The collector water circulation rate, in gallons per minute.
3. The permittee shall collect and record the operating times for the capture (collection) system, control device, monitoring equipment, and emissions unit while the emissions unit is operating for production.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following collector parameters were not maintained at or above the required levels:

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- a. The static pressure drop across the collector.
 - b. The collector water flow rate.
2. The reports for 1 above shall be submitted to the Toledo Division of Environmental Services by Jan. 31, April 30, July 31 and Oct. 31 of each year.

D. Testing Requirements

Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation - 0.32 lbs/hr PM.
Applicable Compliance Method - The permittee shall use an emission factor of 0.044 lb PM/ton of product obtained from General Mills historic records and multiply by the cereal production in tons per hour. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for determining PM emissions.
2. Emission Limitation - 1.4 tons PM/yr.
Applicable Compliance Method - Compliance with (D)(1) will be considered adequate demonstration of compliance.
3. Emission Limitation - 20% opacity as a 6 minute average except as provided by rule.
Applicable Compliance Method - Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

E. Miscellaneous Requirements

Deviations in the pressure drop across the collector and collector water flow rate specified in V.A.1. and V.A.2. is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations.

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SYSTEM #5 FINISHED CEREAL DRYER (P042)

A. Operational Restrictions

1. Only non-photochemically reactive flavorings shall be applied in this emissions unit.
2. Flavoring usage shall not result in an exceedance of the following emission limitations and/or control requirements:
 - a. The permittee shall not employ more than 90 tons of OC per rolling 12 month period based upon the summation of monthly OC usage rates* for emission units P011, P014, P035 and P042 combined (the permittee has sufficient records to demonstrate compliance over the past 12 months).

* Summation of monthly OC usage rate = (C x D) where C = the number of pounds of each flavoring employed per month and D = the pounds of OC per pound of flavoring employed. Monthly OC usage rates are equivalent to monthly OC emission rates and are based upon 100% of the OC in the flavoring being emitted.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the operating hours for this emissions unit.
2. The permittee shall maintain formulation records of all flavorings applied in this emissions unit to ensure that they are not photochemically reactive.
3. The permittee shall collect and record the following information each month for the flavorings applied in this emissions unit:
 - a. The company identification for each flavoring employed.
 - b. The number of pounds of each flavoring as employed.
 - c. The organic compound content of each flavoring, in pounds OC per pound of flavoring.
 - d. The monthly average summation of the OC emissions in lbs/hr as calculated in (D) (1) (c).
 - e. The rolling 12-month summation of the OC emissions in tons as calculated in (D) (1) (d).

C. Reporting Requirements

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1. The permittee shall submit reports that identify all periods of time during which photochemically reactive flavorings were applied in this emissions unit and/or the emissions of organic compounds exceeded 20.5 lbs/hr for P042 or 90 tons/rolling 12-month period combined for P011, P014, P035 and P042.
2. The reports for 1 above shall be submitted to the Toledo Division of Environmental Services by Jan. 31, April 30, July 31 and Oct. 31 of each year.

D. Testing Requirements

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation - 1.51 lbs/hr PM.
Applicable Compliance Method - The permittee shall use an emission factor of 0.1 lb PM/ton of product obtained from General Mills historic records and multiply by the cereal production in tons per hour. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for determining PM emissions.
 - b. Emission Limitation - 6.6 tons PM/yr.
Applicable Compliance Method - Compliance with (D) (1) (a) will be considered adequate demonstration of compliance.
 - c. Emission Limitation - 20.5 lbs/hr OC as a volume-weighted average.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P042 by their appropriate OC content (lbs OC/lb flavoring). The results shall be divided by the hours of operation per month for this emissions unit. If that number is less than 20.5 lbs/hr OC, the source is in compliance with the emission limitation.

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- d. Emission Limitation - 90 tons OC/rolling 12-month period combined for P011, P014, P035 & P042.
Applicable Compliance Method - The permittee shall multiply the pounds of each flavoring used per month in P011, P014, P035 & P042 by their appropriate OC content (lbs OC/lb flavoring). The lbs/month OC for each emissions unit shall be totaled to determine the total lbs/month OC for P011, P014, P035 & P042 combined. The lbs/month OC for each calendar month shall be added to the lbs/month for the previous 11 months and divided by 2000 lbs/ton. If this annual total is less than 90 tons/rolling 12-month period, the combined sources are in compliance with the emission limitation.
 - e. Emission Limitation - 20% opacity as a 6 minute average except as provided by rule.
Applicable Compliance Method - Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
2. The test method which must be employed to demonstrate compliance with photochemical reactivity is the definition of photochemically reactive material in OAC rule 3745-21-01.

E. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ethyl alcohol

TLV (ug/m3): 1,880,000

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Maximum Hourly Emission Rate (lbs/hr): 117.3 OC total for P011, P014, P035 & P042

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):
12,230

MAGLC (ug/m3): 44,762

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

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- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.