



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
STARK 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: 15-01568

Fac ID: 1576000464

DATE: 8/24/2004

F.W. Renner Co.
Terry Renner
1866 Sherrick Rd. SE 20255
Canton, OH 44707

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

Canton LAA



**Permit To Install
Terms and Conditions**

**Issue Date: 8/24/2004
Effective Date: 8/24/2004**

FINAL PERMIT TO INSTALL 15-01568

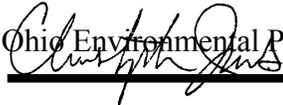
Application Number: 15-01568
Facility ID: 1576000464
Permit Fee: **\$1000**
Name of Facility: F.W. Renner Co.
Person to Contact: Terry Renner
Address: 1866 Sherrick Rd. SE 20255
Canton, OH 44707

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1866 Sherrick Rd., SE
Canton, Ohio**

Description of proposed emissions unit(s):
This permit is for the installation of a replacement cooker for rendering scrap meet. The replacement unit is larger than the original.

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

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. 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.

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>
PE	46.0
VOC	3.3

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>
P003 - This permit is for the installation of a new cooker for rendering fresh scrap meat. A second cooker(P002) will be used as a back-up. Emissions from both emission units will discharge to a jet condenser and the fire box of the boiler supplying steam to the cookers.	OAC rule 3745-31-05(A)(3)	The permittee shall maintain compliance with the following limits: 1.0 lbs VOC/hr 3.3 tons VOC/yr. 10.5 lbs PE/hr. 46.0 tons PE/yr. See section A.2.a and B.1
	OAC rule 3745-15-07(A)	See section A.2.b
	OAC rule 3745-17-07(A)(1)	Opacity shall not exceed 20 percent as a six minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The limits established by this rule are as stringent as those established pursuant to BAT.

2. Additional Terms and Conditions

- 2.a The hourly and annual imitations for PE reflect the unit's potential to emit based on the maximum potential production capability of the emission units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b The permittee shall minimize, at all times, the emission or escape into the open air from

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Issued: 8/24/2004

Emissions Unit ID: **P003**

these emission units any odors in such a manner or in such amounts that endanger the health, safety, or welfare of the public.

B. Operational Restrictions

1. BAT for these emissions units shall also consist of the venting of emissions from both emissions units, while they are operating, to a combined jet condenser/hot well system and then to the firebox of the boiler that provides steam to the cookers. The gas stream from the jet condenser/hot well system will be introduced into the firebox of the boiler in such a manner to provide the maximum destruction of VOC within good engineering practice and while providing for inherent operational restrictions of the boiler.
2. The permittee shall operate only one emissions unit at a time maintaining the other emissions unit as a backup unit. The jet condenser shall be operated during the operation of and for ten(10) minutes following the shutdown of a cooker emission unit.
3. The water temperature of cooling water discharged from the jet condenser shall be greater than or equal to 120 degree F. while a cooker is operating.
4. The permittee shall process only fresh scrap at this rendering facility. For the purposes of compliance with the terms and conditions of this permit, fresh scrap is defined as any non-rancid animal parts or byproducts that are processed within the first 24 hour period following receipt at the facility.
5. The permittee shall install, operate, and maintain the jet condenser/hot well system in accordance with manufacturer's recommendations and all maintenance, operational and installation documents available from the manufacturer for the control device.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall continuously monitor and maintain records of the cooling water temperature discharged from the jet condenser. Data shall be recorded in units of degrees Fahrenheit. The permittee shall operate and maintain a temperature monitor which measures and record(s) the temperature of the cooling water immediately downstream of the condenser when either emissions unit is in operation. The monitoring devices shall be capable of accurately measuring the desired parameter and shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations.
2. The permittee shall maintain records of the date, time, and quantity, in lbs, of each shipment of scrap received by the facility and date and time when the processing of each shipment is completed.

Emissions Unit ID: P003

3. The permittee shall maintain a log of the downtime for the control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving these emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which identify any time periods when the cooling water flow is less than 120 degree Fahrenheit while an emission unit is operating.
2. The permittee shall submit quarterly deviation reports which identify any shipment of scrap by date, time, and quantity, in lbs, that was not processed within a 24 hour period following receipt at the facility.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Canton local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:
10.5 lbs PE/hr.; 46.0 tons PE/yr.

Applicable Compliance Method:

Compliance shall be demonstrated as follows using the maximum Process Weight Rate of 4.05 tons scrap/hr.:

$$4.10 \times (P)^{0.67} \times 0.05 =$$
$$4.10 \times (8100/2000)^{0.67} = 10.5 \text{ lbs PE/hr.}$$

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

- b. Emission Limitations:
1.0 lbs VOC/hr; 3.4 tons VOC/yr.

Applicable Compliance Method:

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

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

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

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

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Emissions Unit ID: **P003**

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

- a. Emission Limitations:
Opacity shall not exceed 20 percent as a six minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.