



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

5/20/2016

Certified Mail

Todd Hoerig  
 ReConserve of Ohio, Inc.  
 2295 Innovation Drive  
 Marion, OH 43302

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0351012010  
 Permit Number: P0120810  
 Permit Type: Administrative Modification  
 County: Marion

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ReConserve of Ohio, Inc.**

Facility ID:	0351012010
Permit Number:	P0120810
Permit Type:	Administrative Modification
Issued:	5/20/2016
Effective:	5/20/2016
Expiration:	12/5/2024





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

for  
ReConserve of Ohio, Inc.

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**Final Permit-to-Install and Operate**  
ReConserve of Ohio, Inc.  
**Permit Number:** P0120810  
**Facility ID:** 0351012010  
**Effective Date:** 5/20/2016

## Authorization

Facility ID: 0351012010  
Application Number(s): M0003902  
Permit Number: P0120810  
Permit Description: Administrative Modification to adjust limits based on stack testing results.  
Permit Type: Administrative Modification  
Permit Fee: \$250.00  
Issue Date: 5/20/2016  
Effective Date: 5/20/2016  
Expiration Date: 12/5/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ReConserve of Ohio, Inc.  
2295 Innovation Dr  
Marion, OH 43302

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

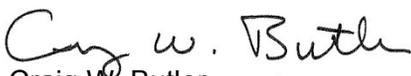
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**  
ReConserve of Ohio, Inc.  
**Permit Number:** P0120810  
**Facility ID:** 0351012010  
**Effective Date:** 5/20/2016

## Authorization (continued)

Permit Number: P0120810

Permit Description: Administrative Modification to adjust limits based on stack testing results.

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

<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	P901 Processing Operations
Superseded Permit Number:	P0117918
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
ReConserve of Ohio, Inc.  
**Permit Number:** P0120810  
**Facility ID:** 0351012010  
**Effective Date:** 5/20/2016

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
ReConserve of Ohio, Inc.  
**Permit Number:** P0120810  
**Facility ID:** 0351012010  
**Effective Date:** 5/20/2016

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



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

ReConserve of Ohio, Inc.

**Permit Number:** P0120810

**Facility ID:** 0351012010

**Effective Date:** 5/20/2016

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
ReConserve of Ohio, Inc.  
**Permit Number:** P0120810  
**Facility ID:** 0351012010  
**Effective Date:** 5/20/2016

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

**1. P901, P901 Processing Operations**

**Operations, Property and/or Equipment Description:**

Processing Operations

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	<u>Drying Operations:</u>  19.83 lbs volatile organic compounds (VOC)/hr and 86.86 tons VOC/yr;  9.05 lbs carbon monoxide (CO)/hr; 39.63 tons CO/yr;  4.90 lbs nitrogen oxides (NOx)/hr; 21.47 tons NOx/yr;  0.03 lb sulfur dioxide (SO2)/hr 0.13 ton SO2/yr;  3.42 lbs particulate matter equal to or less than 10 microns in diameter (PM10)/hr 15.00 tons PM10/yr  Visible particulate emissions (PE) (from



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>the RTO stack in conjunction with 2 cyclones controlling the dryer) shall not exceed 10% opacity as a six-minute average except as provided by rule (See b)(2)f.)</p> <p><u>Raw Material Receiving/Screening and Milling</u>            0.13 ton fugitive PM10/yr from raw material receiving, handling and storage;</p> <p>4.05 tons fugitive PM10/yr from screening and milling</p> <p>Visible fugitive PE from the building enclosure shall not exceed 20% opacity as a three-minute average from the screening and milling and raw material receiving operations</p> <p><u>Paper Removal</u>            0.86 lb PM10/hr; 3.75 tons PM10/yr</p> <p>See b)(2)a. and c)(1)</p>
b.	ORC 3704.03(T)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)d.
e.	OAC rule 3745-17-11(B)	See b)(2)e.
f.	OAC rule 3745-17-07(A)	See b)(2)e.
g.	OAC rule 3745-17-08(B)	See b)(2)g.
h.	OAC rule 3745-17-07(B)	See b)(2)h.
i.	OAC rule 3745-18-06(E)(2)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes legally and practically enforceable emission limitations in b)(1)a. for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(1).
- b. The BAT requirements under ORC 3704.03(T) have been determined to be the following:

- i. Install a regenerative thermal oxidizer (RTO) with a design destructive efficiency of at least 95% of VOC emissions;
- ii. Install an RTO that receives exhaust gases from two cyclones in parallel that control the dryer that is designed to meet a maximum outlet concentration of 0.01 gr/dscf for PM10 emissions; \*
- iii. 0.86 lb PM10/hr; 3.75 tons PM10/yr from the paper removal operations;
- iv. 0.098 lb NOx/mmBtu; and
- v. 0.23 lb CO/per ton of dried food product\*

\*Based on Stack Test performed on 11/24/2015.

- c. The Best Available Technology (BAT) requirement for SO<sub>2</sub> emissions under OAC rule 3745-31-05(A)(3), as effective 11/30/2001 has been determined to be a burner that is designed to meet 0.00058 lb SO<sub>2</sub>/mmBtu.

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective, November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO<sub>2</sub> emissions since the potential to emit is less than ten tons per year taking into account the legally and practically enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

- f. PM10 is generated by and emitted from 2 single specific processes as identified below:

- i. a single stack from the paper removal operations;

- ii. a single stack serving the RTO that receives exhaust gas from two cyclones in parallel controlling the NG fired dryer.
- g. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- h. This emissions unit is exempt from the visible PE limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

c) **Operational Restrictions**

- (1) The following operational restrictions are being established for purposes of establishing legally and practically enforceable requirements which limit PTE [See b)(2)a].
  - a. All exhaust gas from the dryer shall be controlled by an RTO with a design destruction efficiency of at least 95% for VOC;
  - b. Install an RTO that receives exhaust gas from two cyclone in parallel that control the dryer that is designed to meet a maximum outlet concentration of 0.01 gr/dscf for PM10;
  - c. The maximum annual throughput for truck unloading and material handling operations for emissions unit P901 shall not exceed 350,400 tons of food by-products per year;
  - d. The maximum annual throughput for screening and milling operations for emissions unit P901 shall not exceed 350,400 tons of food by-products per year.

During periods of start-up\* of the dryer burner, only natural gas/propane fuel shall be fired in the burner.

\*Start-up shall be defined as that period of time beginning when the natural gas/propane fuel is first ignited in the burner until such a time as the dryer ID fan is turned on. Shutdown shall be defined as that period of time beginning when the dryer ID fan is turned off and all combustible fuels charged into the burner have been consumed.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information on a monthly basis:
  - a. the amount of food by-products processed in the screening and milling operation;
  - b. the amount of food by-products processed in the truck unloading and material handling operation;

- c. the cumulative year-to-date throughput of the screening and milling operation and the truck unloading and material handling operations., in tons.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below 1597 degrees Fahrenheit for Bed 1 and 1592 degrees Fahrenheit for Bed 2 of the RTO as tested on 11/24/2015.
  - (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
    - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
    - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.These records shall be maintained at the facility for a period of three years.
  - (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
    - a. the date and time the deviation began;
    - b. the magnitude of the deviation at that time;
    - c. the date the investigation was conducted;
    - d. the name(s) of the personnel who conducted the investigation; and

- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (5) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving the RTO and paper removal operations. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(5)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the building egress points (i.e., building windows, doors, roof monitors, etc.) serving this process. 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 location and 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 eliminate the abnormal 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)(6)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.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(5) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
  
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(6) above:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions.
  
- (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in e)(4)a. or e)(4)b. where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(4)a. or e)(4)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in e)(4)a. or e)(4)b. where proper records were not maintained for the investigation and/or the corrective action(s).
  
- f) **Testing Requirements**
  - (1) The permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:
    - a. The emission testing shall be conducted no later than December 5, 2019.

- b. Testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
- c. The emission testing shall be conducted to demonstrate compliance with the following:
- i. the RTO shall achieve a minimum destruction efficiency of 95% for VOC;
  - ii. the RTO/cyclones shall achieve a maximum outlet concentration of 0.01 gr/dscf for PM10;
  - iii. an emission rate of 19.83 pounds VOC per hour from the RTO;
  - iv. an emission rate of 4.90 pounds NO<sub>x</sub> per hour from the RTO;
  - v. an emission rate of 9.05 pounds of CO per hour from the RTO; and
  - vi. an emission rate of 3.42 lbs PM10 per hour from the RTO
- d. The following test method(s) shall be employed to meet the testing requirements above:
- PM10 – Methods 1-4 of 40, Part 60, Appendix A and 201/201A and 202 of 40 CFR Part 51, Appendix M;
- NO<sub>x</sub> - Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;
- CO -Methods 1-4 and 10 of 40 CFR Part 60, Appendix A;
- VOC - Methods 1-4 and 18, 25, or 25A, as applicable of 40 CFR Part 60, Appendix A.
- Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- The test method(s) which must be employed to demonstrate compliance with the destruction and capture efficiency requirements for VOC are specified below
- e. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions

unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

- g. 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).
  - h. 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.
  - i. 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
19.83 lbs VOC/hour and 86.86 tons VOC/year

Applicable Compliance Method:

The VOC emissions factor is based on similar source stack test data and is an engineering estimate. Compliance with the pound per hour emission limitation shall be determined based on the results of emission testing conducted in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25 or 25A as applicable [See Testing Requirements in f)(1)].

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly allowable emission limitation, compliance with the annual emission limitation shall also be demonstrated.

- b. Emission Limitation:  
RTO shall achieve a minimum destruction efficiency of 95% for VOC

Applicable Compliance Method:

Compliance with the destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined based on the results of emission testing conducted in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. [See Testing Requirements in f)(1)].

c. Emission Limitation:

RTO stack shall achieve a maximum outlet concentration of 0.01 gr/dscf for PM10.

Applicable Compliance Method:

Compliance with the maximum outlet concentration limitation shall be determined based on the results of emission testing conducted in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M [See Testing Requirements in f)(1)].

d. Emission Limitation:

4.90 lbs NOx/hour and 21.47 tons NOx/year.

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying an AP-42 emission factor of 100 pounds NOx per mmBtu [Table 1.4-1 (7/98)] by a maximum heat input of 50 mmBtu per hour. Compliance with the lb/hr limitation shall be determined based on the results of emission testing conducted in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 7 [See Testing Requirements in f)(1)].

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly allowable emission limitation, compliance with the annual emission limitation will be assumed.

e. Emission Limitation

9.05 lbs CO/hour and 39.64 tons CO/year

Applicable Compliance Method

The potential to emit is based on actual emissions derived from a stack test conducted on 11/24/2015. The actual emission rate during testing was 7.86 lbs CO/hr which is multiplied by a safety factor of 15% to determine the maximum hourly rate. Compliance with the lb/hr limitation shall be determined based on the results of emission testing conducted in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 10 [see Testing Requirements in f)(1)].

The annual limitation represents the potential to emit and was developed by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation will be assumed.

- f. Emission Limitation  
0.03 lb SO<sub>2</sub>/hour and 0.13 ton SO<sub>2</sub>/year

Applicable Compliance Method

The potential to emit is based on an AP-42 emission factor of 0.6 pounds SO<sub>2</sub> per mmBtu [Table 1.4-1 (7/98)] and a maximum heat input of 50 mmBtu per hour. If required compliance with the hourly limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation will be assumed.

- g. Emission Limitation:  
3.42 lb PM<sub>10</sub>/hr and 15.00 tons PM<sub>10</sub>/yr from the RTO

Applicable Compliance Method:

The potential to emit is based on actual emissions derived from a stack test conducted on 11/24/2015. The actual emission rate during testing was 2.98 lbs PM<sub>10</sub>/hr which is multiplied by a safety factor of 15% to determine the maximum hourly rate. Compliance with the lb/hr limitation shall be determined based on the results of emission testing conducted in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 201/201A and 202 of 40 CFR Part 51 Appendix M [see Testing Requirements in f)(1)].

The annual limitation represents the potential to emit and was developed by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation will be assumed.

Note: PM<sub>10</sub> emission limits are conservatively based on a particle size multiplier listed in AP-42 Chapter 9.9.1

- h. Emission Limitation:  
0.86 lb PM<sub>10</sub>/hour and 3.75 tons PM<sub>10</sub>/year from paper removal operation

Applicable Compliance Method:

The hourly limitation is based on a grain loading efficiency of 0.02 gr/dscf multiplied by 20,000 acfm and 60 min/hr and then dividing by 7000 grains/lb.

The annual limitation represents the potential to emit and was developed by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation will be assumed.

Note: PM10 emission limits are conservatively based on a particle size multiplier listed in AP-42 Chapter 9.9.1

- i. Emission Limitation:  
0.13 ton fugitive PM10/yr from raw material receiving, material handling and storage  
  
Applicable Compliance Method:  
  
Compliance with this limitation shall be demonstrated through the recordkeeping requirements specified in section d)(1).
- j. Emission Limitation  
4.05 tons fugitive PM10/yr from screening and milling  
  
Applicable Compliance Method  
Compliance with this limitation shall be demonstrated through the recordkeeping requirements specified in section d)(1).
- k. Emission Limitation  
Visible particulate emissions from the stack serving the RTO stack in conjunction with 2 cyclones controlling the dryer shall not exceed 10 percent opacity as a six-minute average, except as specified by rule.  
  
Applicable Compliance Method  
If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.
- l. Emission Limitation  
Visible PE from the stack serving the paper removal operation shall not exceed 20% opacity as a six-minute average  
  
Applicable Compliance Method  
If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.
- m. Emission Limitation  
Visible fugitive PE from the building enclosure shall not exceed 20% opacity as a three-minute average from the screening and milling and raw material receiving operations



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

ReConserve of Ohio, Inc.

**Permit Number:** P0120810

**Facility ID:** 0351012010

**Effective Date:** 5/20/2016

Applicable Compliance Method

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.