Ohio Environmental Protection Agency

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

9/19/2016

Certified Mail

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

Kathy Rebensdorf
Koch Foods, Inc.
4100 Port Union Road
Fairfield, OH 45014

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409030900
Permit Number: P0121014
Permit Type: OAC Chapter 3745-31 Modification
County: Butler

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Koch Foods, Inc. is a manufacturer of packaged flash frozen meat products located in Butler County, Ohio. Chicken and beef products are made. The facility currently operates six (6) cook lines and several fuel-burning units for producing steam for cooking, oven heat, hot water, and char marking.

3. Facility Emissions and Attainment Status:

   This facility is currently a True Minor source of criteria pollutants and hazardous air pollutants (HAPs) located in Butler County Ohio. Southwest Ohio is nonattainment for the 8hr ozone standard and PM 2.5 and attainment for PM10, CO, NOx, and SO2.

4. Source Emissions:

   Through the Chapter 31 modifications of P0121014 (P011) and P0121015 (P003-P005), the applicant seeks to increase the facility-wide production of beef products. The cooking of beef products significantly increases the potential to emit for VOC and PE/PM10 emissions to much higher than 100 TPY each which would make Koch Foods a Title V facility. Additionally, the emission increases for PM2.5 and VOC would qualify the facility for Non-Attainment New Source Review. In order to avoid Title V and Non-Attainment New Source Review, the facility has requested a facility-wide beef production limit of 13,030 tons per year, based on a rolling 12-month summation in order to limit the PE/PM10/PM2.5 and VOC emissions from all emission units at the site to under 100 TPY. This beef limit applies to emissions units P001, P003, P004, P005 and P011 since they are the only cook lines that will be cooking beef.

5. Conclusion:

   The facility-wide beef production limitation will limit the facility-wide PE/PM10/PM2.5 and VOC emissions to under 100 TPY each and therefore Draft issuance of this FEPTIO is recommended.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
NOx	1.56
CO	1.32
PE/PM10	39.27
VOC	38.55

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate OAC Chapter 3745-31 Modification
Koch Foods, Inc.
4100 PORT UNION RD.,, Fairfield, OH 45014
ID#:P0121014
Date of Action: 9/19/2016
Permit Desc:Chapter 31 modification permit to allow for the cooking of beef products..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Paul Tedtman, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Koch Foods, Inc.

Facility ID:	1409030900
Permit Number:	P0121014
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/19/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Koch Foods, Inc.

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Authorization

Facility ID:	1409030900
Application Number(s):	A0056193
Permit Number:	P0121014
Permit Description:	Chapter 31 modification permit to allow for the cooking of beef products.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$1,000.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	9/19/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Koch Foods, Inc.
4100 PORT UNION RD.
Fairfield, OH 45014

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0121014
Permit Description: Chapter 31 modification permit to allow for the cooking of beef products.

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

Emissions Unit ID:	**P011**
Company Equipment ID:	Line 6
Superseded Permit Number:	P0119547
General Permit Category and Type:	Not Applicable

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 Southwest Ohio Air Quality Agency 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

B. Facility-Wide Terms and Conditions

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) B.2. – B.11.

2. OAC rule 3745-31-05(D) shall apply to the following emissions units: B001 (Boiler #3), B002 (Thermal Fluid Heater #1), B003 (Thermal Fluid Heater #2), B004 (Boiler #4), B005 (Thermal Fluid Heater #3), B006 (Thermal Fluid Heater #4), B007 (Boiler #5), B008 (Boiler #6), B009 (Thermal Fluid Heater #5), P001 (Cook Line 2), P002 (Cook Line 1), P003 (Cook Line 3), P004 (Cook Line 4), P005 (Cook Line 5), P006 (15 MMBtu/hr Kemco water heater #1), P007 (15 MMBtu/hr Kemco water heater #2), P008 (15 MMBtu/hr Kemco water heater #3), P010 (1.03 MMBtu/hr Natural Gas Fired Emergency Generator), P011 (Cook Line 6), P012 (Cook Line 7), P013 (25 MMBtu/hr Kemco water heater) along with any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units at the facility as this permit is a Synthetic Minor to avoid Title V permitting.

3. The actual particulate emissions (PE) (filterable and condensable), particulate matter with a diameter 10 microns and less and (PM10) (filterable and condensable) and particulate matter with a diameter 2.5 microns and less and (PM2.5) (filterable and condensable) stack emissions from emissions units B001, B002, B003, B004, B005, B006, B007, B008, B009, P001, P002, P003, P004, P005, P006, P007, P008, P010, P011, P012, P013, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 99.9 TPY for PE/PM10/PM2.5, as a rolling, 12-month summation.

   The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

4. The amount of cooked products production and the PE/PM10/PM2.5 emissions are restricted by the following equation:

   [Beef Production, tons, per rolling, 12-month period x Beef Uncontrolled Emission Factor for Char and Oven (lbs/ton) + Chicken Production, tons, per rolling, 12-month period x Chicken Uncontrolled Emission Factor for Char and Oven (lbs/ton) + Fried Chicken Production, tons, per rolling, 12-month period x Fried Chicken Emission Factor (lb/ton) + Fried Beef Production, tons, per rolling, 12-month period x Fried Beef Emission Factor (lb/ton) + emissions from B001, B002, B003, B004, B005, B006, B007, B008, B009, P006, P007, P008, P010, P013, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units as calculated] / 2,000 lbs/ton ≤ 99.9 TPY of PE/PM10/PM2.5, based upon a rolling, 12-month summation of the monthly emissions.

Note: Apply 40% control efficiency for the rotoclone on P001 for control of PE/PM10/PM2.5.

where:

Uncontrolled Emission Factor(s) = the Uncontrolled Stack Emissions Factor for PE/PM10/PM2.5 emissions (filterable and condensable) for the corresponding cooked product; for Char and Oven Beef product, P001, P003 – P005, P011 = 3.02 lbs of PE/PM10/PM2.5/ton of cooked product, for Fried Beef product, P003 – P005, P011= 0.11 lbs of PE/PM10/PM2.5/ton of cooked product, for Fried Chicken Product, P001 = 0.74 lb of PE/PM10/PM2.5 of cooked product, for Oven Chicken Product, P001 = 0.047 lb of PE/PM10/PM2.5 of cooked chicken product, for Fried Chicken product, P002, P003 – P005, P011, P012 = 0.151 lb of PE/PM10/PM2.5/ton of cooked product, for Char and Oven Chicken product, P003 = 0.161 lb of PE/PM10/PM2.5/ton of cooked product, for Char and Oven Chicken product, P004 – P005, P011, P012 = 0.063 lb of PE/PM10/PM2.5/ton of cooked product.

Pounds per ton Emission Factors may be revised based upon Ohio EPA validated emissions testing and shall be revised if emissions testing results demonstrate higher emissions.

5. The actual stack emissions of volatile organic compounds (VOC) from emissions units B001, B002, B003, B004, B005, B006, B007, B008, B009, P001, P002, P003, P004, P005, P006, P007, P008, P010, P011, P012, P013, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 99.9 TPY for VOC, as a rolling, 12-month summation.

   The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

6. The amount of cooked products production and the VOC emissions are restricted by the following equation:

   [Beef Production, tons, per rolling, 12-month period x Beef Uncontrolled Emission Factor for Char and Oven (lbs/ton) + Chicken Production, tons, per rolling, 12-month period x Chicken Uncontrolled Emission Factor for Char and Oven (lbs/ton) + Fried Chicken Production, tons, per rolling, 12-month period x Fried Chicken Emission Factor (lb/ton) + Fried Beef Production, tons, per rolling, 12-month period x Fried Beef Emission Factor (lb/ton) + emissions from B001, B002, B003, B004, B005, B006, B007, B008, B009, P006, P007, P008, P010, P013, any deminimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units as calculated] / 2,000 lbs/ton ≤ 99.9 TPY of VOC, based upon a rolling, 12-month summation of the monthly emissions.

   where:

   Uncontrolled Emission Factor(s) = the Uncontrolled Stack Emissions Factor for VOC emissions for the corresponding cooked product; for Char and Oven Beef product, P001, P003 – P005, P011 = 1.32 lbs of VOC/ton of cooked product, for Fried Beef product, P003 – P005, P011= 2.61 lbs of VOC/ton of cooked product, for Fried Chicken Product, P001 = 0.86 lb of VOC of cooked product, for Oven Chicken Product, P001 = 0.008 lb of VOC of cooked product,for Fried Chicken product, P002, P003 – P005, P011, P012 = 0.089 lb of VOC/ton of cooked product, for Char and Oven Chicken product, P003 = 0.078 lb of VOC/ton of cooked product, for Char and Oven Chicken product, P004 – P005, P011, P012 = 0.022 lb of VOC/ton of cooked product.

Pounds per ton Emission Factors may be revised based upon Ohio EPA validated emissions testing and shall be revised if emissions testing results demonstrate higher emissions.

7. The facility-wide amount of beef processed at this facility in emissions units P001, P003-P005 and P011 shall not exceed 13,030 TPY based upon a rolling 12-month summation.

   The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

8. The permittee shall collect and record the following information each month for emissions units B001, B002, B003, B004, B005, B006, B007, B008, B009, P001, P002, P003, P004, P005, P006, P007, P008, P010, P011, P012, P013, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined:

   a) The identification of each cooked product produced;

   b) The number of tons of each cooked product produced;

   c) The total number of tons of all cooked products produced;

   d) The PE/PM10/PM2.5 emission factor, in pounds of PE/PM10/PM2.5 emissions per ton of cooked product, of each cooked product produced

   e) The PE/PM10/PM2.5 emission factor(s), in the appropriate unit(s), for each fuel-burning source;

   f) The VOC emission factor, in pounds of VOC emissions per ton of cooked product, of each cooked product produced;

   g) The VOC emission factor(s), in the appropriate unit(s), for each fuel-burning source;

   h) The total stack PE/PM10/PM2.5 emission rate for all cooked products produced, in pounds or tons;

   i) The total stack PE/PM10/PM2.5 emission rate for all fuel-burning sources, in pounds or tons;

   j) The total stack VOC emission rate for all cooked products produced, in pounds or tons;

   k) The total stack VOC emission rate for all fuel-burning sources, in pounds or tons;

   l) The updated rolling, 12-month summation of stack PE/PM10/PM2.5 emissions, in tons. (This shall include the information for the current month and the preceding eleven months); and

   m) The updated rolling, 12-month summation of stack VOC emissions, in tons. (This shall include the information for the current month and the preceding eleven months).

   n) The updated rolling, 12-month summation of beef production, in tons. (This shall include the information for the current month and the preceding eleven months).

9. The permittee shall submit quarterly deviation (excursion) reports that identify:

a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

(1) all exceedances of the rolling, 12-month emission limitation for stack PE/PM10/PM2.5 emissions;

(2) all exceedances of the rolling, 12-month emission limitation for stack VOC emissions; and

(3) all exceedances of the rolling, 12-month beef production limitation.

b) the probable cause of each deviation (excursion);

c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

10. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

11. Compliance with the Emissions Limitations and/or Control Requirements specified above of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

99.9 TPY for PE/PM10/PM2.5, based on a rolling, 12-month summation for the emissions units listed in B.3.

99.9 TPY of VOC, based on a rolling, 12-month summation for the emissions units listed in B.5.

Applicable Compliance Method:

Compliance with the PE/PM10/PM2.5 and VOC emission limitations shall be demonstrated by the record keeping requirements specified in B.8.

Facility-Wide Beef Production Limitation:

The facility-wide amount of beef processed at this facility shall not exceed 13,030 TPY based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the beef production limitation shall be demonstrated by the record keeping requirements specified in B.8.

C. Emissions Unit Terms and Conditions

1. P011, Line 6

Operations, Property and/or Equipment Description:

Cooking Line 6 - Char Marker (4.3 MMBtu/hr) and Spiral Indirect Heated Oven / Fryer

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. b)(1)c.

(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. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	Stack particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions (filterable and condensable) and particulate matter 2.5 microns and less in diameter (PM2.5) emissions (filterable and condensable) from emissions units P001, P003 through P005 and P011, as a group, shall not exceed 3.3 tons per month averaged over a twelve-month rolling period. Stack volatile organic compound (VOC) emissions from emissions units P001, P003 through P005 and P011, as a group, shall not exceed 3.2 tons per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Nitrogen oxides (NOx) emissions shall not exceed 0.13 ton per month averaged

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		over a twelve-month rolling period. Carbon monoxide (CO) emissions shall not exceed 0.11 ton per month averaged over a twelve-month rolling period. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx and CO, emissions from this air contaminant source since the potential to emit for each is less than 10 tons per year. See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V Applicability and Nonattainment New Source Review	See 3. - 5. of Section B.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
f.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.
g.	OAC rule 3745-17-11(B)(1)	Filterable particulate emissions (PE) shall not exceed 14.0 pounds per hour.

(2) Additional Terms and Conditions

a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the identification of each cooked product produced;

b. the number of tons of each cooked product produced;

c. the PE/PM10/PM2.5 emission factor, in pounds of PE/PM10/PM2.5 emissions per ton of cooked product, of each cooked product produced;

d. the VOC emission factor, in pounds of VOC emissions per ton of cooked product, of each cooked product produced;

e. the total stack PE/PM10/PM2.5 emission rate for all cooked products produced, in pounds or tons;

f. the total stack VOC emission rate for all cooked products produced, in pounds or tons;

g. the total fugitive PE/PM10/PM2.5 emission rate for all cooked products produced, in pounds or tons;

h. the total fugitive VOC emission rate for all cooked products produced, in pounds or tons; and

i. the updated monthly emission rates, in tons, for stack PE/PM10/PM2.5, fugitive PE/PM10/PM2.5, stack VOC, and fugitive VOC averaged over a twelve-month rolling period. (This shall include the information for the current month and the preceding eleven months.)

(2) 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 stack and for any visible emissions of fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the 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 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;

ii. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

iii. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive particulate emissions.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.

(3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Nitrogen oxides (NOx) emissions shall not exceed 0.13 ton per month averaged over a twelve-month rolling period.

Carbon monoxide (CO) emissions shall not exceed 0.11 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The potential monthly averaged emission rates for this emissions unit were determined based on the following equations from the permittee-supplied information in the PTIO application for P0121014 as submitted on June 20, 2016:

NOx = (4.3 MMBtu/hr max heat input rating) x (100 lbs of NOx/10^6 scf of natural gas usage; AP-42 Table 1.4-1, 7/1998) / (1020 MMBtu/10^6 scf of natural gas; AP-42 Table 1.4-1, 7/1998) x (7300 hours per year) / (2000 lbs/ton) / (12 months/year) = 0.13 ton per month.

CO = (4.3 MMBtu/hr max heat input rating) x (84 lbs of CO/10^6 scf of natural gas usage; AP-42 Table 1.4-1, 7/1998) / (1020 MMBtu/10^6 scf of natural gas; AP-42 Table 1.4-1, 7/1998) x (7300 hours per year) / (2000 lbs/ton) / (12 months/year) = 0.11 ton per month.

b. Emission Limitations:

Stack particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions (filterable and condensable) and particulate matter 2.5 microns and less in diameter (PM2.5) emissions (filterable and condensable) from emissions units P001, P003 through P005 and P011, as a group, shall not exceed 3.3 tons per month averaged over a twelve-month rolling period.

Stack volatile organic compound (VOC) emissions from emissions units P001, P003 through P005 and P011, as a group, shall not exceed 3.2 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

Compliance with the monthly PE/PM10/PM2.5 emissions limitation shall be demonstrated by calculating the rolling, 12-month annual PE/PM10/PM2.5 emissions, as outlined in section B., and dividing by 12.

Compliance with the monthly VOC emissions limitation shall be demonstrated by calculating the rolling, 12-month annual VOC emissions, as outlined in section B., and dividing by 12.

The monthly emissions limitation was calculated based on information supplied by the permittee in PTI Application A0056193 for PTI P0121014 as submitted on June 20, 2016:

39.27 TPY PE/PM10/PM2.5/12 = 3.3 Tons PE/PM10/PM2.5 per month, 12-month rolling avg

38.55 TPY VOC/12 = 3.2 Tons VOC per month, 12-month rolling avg

c. Emission Limitations:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible fugitive particulate emissions shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitations shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Filterable particulate emissions (PE) shall not exceed 14.0 pounds per hour.

Applicable Compliance Method:

The allowable emission rate is based upon the process weight rate of 12,500 pounds per hour of raw meat throughput and Table I listed in the Appendix of OAC rule 3745-17-11.

If required, compliance with the pound per hour emission limitation shall be demonstrated by testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 – 5.

g) Miscellaneous Requirements

(1) None.