



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

10/6/2016

Certified Mail

Gary Schoenwald
 Rothenbuhler Cheesemakers, Inc.
 15815 Nauvoo Rd.
 Middlefield, OH 44062

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: 0228000116
 Permit Number: P0121535
 Permit Type: Initial Installation
 County: Geauga

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

How to give us feedback on your permitting experience

Please complete a survey at 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 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, Northeast District Office at (330)963-1200 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-NEDO



FINAL

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

Facility ID:	0228000116
Permit Number:	P0121535
Permit Type:	Initial Installation
Issued:	10/6/2016
Effective:	10/6/2016
Expiration:	10/6/2026



Division of Air Pollution Control
Permit-to-Install and Operate
for
Rothenbuhler Cheesemakers, Inc.

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Final Permit-to-Install and Operate
Rothenbuhler Cheesemakers, Inc.
Permit Number: P0121535
Facility ID: 0228000116
Effective Date: 10/6/2016

Authorization

Facility ID: 0228000116
Application Number(s): A0056631
Permit Number: P0121535
Permit Description: Initial installation PTIO for an anaerobic wastewater digester system with flare and a natural gas/biogas-fired boiler (already installed).
Permit Type: Initial Installation
Permit Fee: \$800.00
Issue Date: 10/6/2016
Effective Date: 10/6/2016
Expiration Date: 10/6/2026
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Rothenbuhler Cheesemakers, Inc.
15815 NAUROO RD
Middlefield, OH 44062

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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
Rothenbuhler Cheesemakers, Inc.
Permit Number: P0121535
Facility ID: 0228000116
Effective Date: 10/6/2016

Authorization (continued)

Permit Number: P0121535

Permit Description: Initial installation PTIO for an anaerobic wastewater digester system with flare and a natural gas/biogas-fired boiler (already installed).

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

Emissions Unit ID:	B006
Company Equipment ID:	Boiler 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Digester
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Rothenbuhler Cheesemakers, Inc.
Permit Number: P0121535
Facility ID: 0228000116
Effective Date: 10/6/2016

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
Rothenbuhler Cheesemakers, Inc.
Permit Number: P0121535
Facility ID: 0228000116
Effective Date: 10/6/2016

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.a)(1), B.3.a), B.4.a)(1) and B.4.a)(2).

2. Applicable Emissions Limitations and/or Control Requirements

a) Facility-wide emissions 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
(1)	OAC rule 3745-31-05(E) (Voluntary restriction to avoid Ohio Significant Impact Modeling for SO ₂)	Facility-wide (B006 and P004) SO ₂ emissions from digester gas usage shall not exceed 39.0 tons per year, based upon a rolling 12-month summation. See B.2.b)(1), B.2.b)(2) and B.2.b)(3).

b) Additional Terms and Conditions

(1) None.

3. Operational Restrictions

a) Facility-wide (B006 and P004) digester gas usage shall not exceed 295 MMscf/year, based upon a rolling 12-month summation.

4. Monitoring and/or Recordkeeping Requirements

a) The permittee shall calculate and record the following information each month for emissions units B006 and P004 combined:

(1) the monthly digester gas usage, in MMscf; and

(2) the rolling 12-month summation of digester gas usage, in MMscf/year.

5. Reporting Requirements

- a) The permittee shall submit annual Permit Evaluation Reports (PERs) that identify any rolling, 12-month period in which facility-wide (B006 and P004) digester gas usage exceeded 295 MMscf/year, as identified in B.3.a) above.

6. Testing Requirements

- a) Compliance with the Emissions Limitations and/or Control Requirements specified in sections B.2.a) of these terms and conditions shall be determined in accordance with the following methods:

(1) Emission Limitation:

Facility-wide (B006 and P004) SO₂ emissions from digester gas usage shall not exceed 39.0 tons per year, based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.4.a) above, C.1.d)(2) and C.1.d)(4) for B006 below, C.2.d)(1) and C.2.d)(4) for P004 below, and using the following equations:

E_A = the sum of E_M for the previous 12 months; and

E_M = biogas burned (ft³/month) x (H₂S ppm_v / 1,000,000) x 0.088 lb H₂S/ft³ H₂S x 1.88 lb SO₂/lb H₂S / 2000 lbs/ton.

Where:

E_A = SO₂ emissions rate, tons/rolling, 12-month period;

E_M = SO₂ emissions rate, tons/month;

Biogas burned (ft³/month) = amount of actual fuel burned each month from B.4.a) above;

H₂S ppm_v = average concentration of H₂S in digester gas, from C.1.d)(2) for B006 and C.2.d)(1) for P004; and

Allowable emissions = allowable biogas combusted (295 MMft³/year) x 1600 ppm H₂S x 0.088 lb H₂S/ft³ H₂S x 1.88 lbs SO₂/lb H₂S / 2000 lb/ton = 39.0 tons per rolling, 12-month period.

7. Miscellaneous Requirements

- a) Potential SO₂ emissions from natural gas combustion on emissions units B006 and P004 are 0.062 ton per year, and are calculated as follows:

(B006 rated heat input of 9.59 MMBtu/hr + P004 rated heat input of 14.4 MMBtu/hr) x 8760 hours/year x 0.00059 lb SO₂/MMBtu (AP-42 Table 1.4-2) / 2000 lbs/ton = 0.062 ton SO₂/year.



Final Permit-to-Install and Operate
Rothenbuhler Cheesemakers, Inc.
Permit Number: P0121535
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Therefore, adding in the combustion of natural gas for emissions units B006 and P004 will not result in SO₂ emissions exceeding the 40 tons per year modeling threshold for SO₂.



Final Permit-to-Install and Operate
Rothenbuhler Cheesemakers, Inc.
Permit Number: P0121535
Facility ID: 0228000116
Effective Date: 10/6/2016

C. Emissions Unit Terms and Conditions

1. B006, Boiler 6

Operations, Property and/or Equipment Description:

9.59 MMBtu/hr biogas and natural gas-fired boiler

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.	ORC 3704.03(T)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.53 pound per million Btu (lb/mmBtu). See c)(1) and c)(2) below.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Nitrogen oxides (NO _x) emissions shall not exceed 0.70 ton per month, averaged over a 12-month rolling period. Carbon monoxide (CO) emissions shall not exceed 0.59 ton per month, averaged over a 12-month rolling period. See b)(2)a. and b)(2)c. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	Emissions shall not exceed 0.020 pound particulate emissions per million BTU actual heat input.
f.	OAC rule 3745-31-05(E) (Voluntary restriction to avoid Ohio Significant Impact Modeling for SO ₂)	Facility-wide (B006 and P004) SO ₂ emissions from digester gas usage shall not exceed 39.0 tons per year, based upon a rolling 12-month summation. See B.1. through B.7. above.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies 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. The ton per month limitations for NO_x and CO are based on the emissions unit's potentials to emit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas, or digester gas with a minimum heat content of 500 Btu / scf, in this emissions unit.
- (2) Digester gas combusted in this emissions unit shall not exceed 1600 parts per million on a volume basis (ppm_v) of hydrogen sulfide (H₂S).

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day the permittee burns a fuel other than natural gas or digester gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

- (2) The permittee shall monitor and record hydrogen sulfide concentrations when operating the emissions unit with digester gas using one of the two following options:

Option 1: Weekly gas detector tube sampling. The accuracy of gas detector tubes is presumed to be $\pm 10\%$, unless the permittee is able to demonstrate better accuracy of the detector tubes compared to a certified gas standard. The permittee shall perform gas detector tube monitoring in accordance with the manufacturer's instructions for use of the detector tubes and associated sampling system. Any deviations from the manufacturer's instructions should be recorded with the concentration results of the sampling.

Option 2: Continuous digester gas monitoring system. The permittee may install a sampling and analysis system to continuously monitor and record the H₂S content of the digester gas. The permittee shall properly install, operate, and maintain a continuous digester gas H₂S monitoring device and recorder that measures and records the H₂S concentrations in the digester gas when the emissions unit is in operation, including periods of startup and shutdown. The H₂S monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 5 and shall be capable of accurately measuring the H₂S concentration. The H₂S monitoring device 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.

Whenever the monitored value for hydrogen sulfide exceeds the lower limit of the accuracy of the monitoring system as measured by either of the above monitoring options, 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 hydrogen sulfide concentration below the maximum 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 the 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. hydrogen sulfide 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.

- (3) The permittee shall maintain monthly records of the heat content of the digester gas, in Btu/scf. Heat content may be measured or it may be estimated from measured CO₂, O₂, and H₂S in digester gas, as follows:

Digester gas heat content (Btu/scf) = [100% - CO₂ (%) - H₂S (ppm) / 10⁴ (%/ppm) - O₂ (%) - (O₂ (%) x 78% N₂ in air / 21% O₂ in air)] x 1000 Btu/scf methane

- (4) The permittee shall maintain monthly records of the natural gas and digester gas fuel usage in this unit in millions of standard cubic feet.

e) Reporting Requirements

- (1) 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.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(1), d)(2) and d)(3):
 - a. all periods of time during which the permittee burns a fuel other than natural gas or digester gas in this emissions unit and the type and quantity of fuel burned;
 - b. each month during which digester gas with a minimum heat content of less than 500 Btu / scf was burned in this emissions unit; and
 - c. each period during which digester gas containing an H₂S concentration greater than allowed by c)(2) (1600 ppm_v) was burned.

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. Emissions limitation:

Sulfur dioxide (SO₂) emissions shall not exceed 0.53 pound per million Btu (lb/mmBtu).

Applicable compliance method:

The permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through the required monitoring and recordkeeping in d)(2) and using the following equation:

$$E = (10^6 \text{ Btu} / 1 \text{ mmBtu}) * (1 / \text{digester gas heat content}) * (\text{H}_2\text{S ppm}_v / 1,000,000) * 0.088 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S} * 1.88 \text{ lbs SO}_2/\text{lb H}_2\text{S} = \text{SO}_2 \text{ lb/mmBtu}$$

Where:

E = SO₂ emissions rate, lb/mmBtu;

Digester gas heat content = average heat content of digester gas in Btu/scf from d)(3); and

H₂S ppm_v = average concentration of H₂S in digester gas, from d)(2).

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in 40 CFR, Part 60 Appendix A.

b. Emissions limitation:

NO_x emissions shall not exceed 0.70 ton per month, averaged over a 12-month rolling period.

Applicable compliance method:

Compliance with the allowable mass emission rate for NO_x may be determined by the following calculation: NO_x emissions factor of 100 lb/MMscf (per AP-42 Table 1.4-1, 7/98) / heat content of biogas of 500 btu/scf x rated heat input of 9.59 mmBtu/hr x 8760 hours/year x 1 ton/2000 lbs = 8.40 tons per year / 12 months/year results in allowable emissions of 0.70 ton per month.

If required, the permittee shall demonstrate compliance with applicable emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

c. Emissions limitation:

CO emissions shall not exceed 0.59 ton per month, averaged over a 12-month rolling period.

Applicable compliance method:

Compliance with the allowable mass emission rate for CO may be determined by the following calculation: CO emissions factor of 84 lb/MMscf (per AP-42 Table 1.4-1, 7/98) / heat content of biogas of 500 btu/scf x rated heat input of 9.59 mmBtu/hr x 8760 hours/year x 1 ton/2000 lbs = 7.06 tons per year / 12 months/year results in allowable emissions of 0.59 ton per month.

If required, the permittee shall demonstrate compliance with applicable emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

d. Emissions limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable compliance method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

e. Emissions limitation:

Emissions shall not exceed 0.020 pound particulate emissions per million BTU actual heat input.

Applicable compliance method:

If required, compliance with the particulate emissions limitation shall be determined through emission testing performed in accordance with U.S. EPA Method 5.

g) Miscellaneous Requirements

(1) None.



2. P004, Digester

Operations, Property and/or Equipment Description:

Anaerobic wastewater digester system with an associated flare that has a heat input rating of 14.4 mmBtu/hr.

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.	ORC 3704.03(T)	Sulfur dioxide (SO ₂) emissions shall not exceed 2.80 tons per month, averaged over a 12-month rolling period. See c)(1) and c)(2) below. Carbon monoxide (CO) emissions shall not exceed 1.63 tons per month, averaged over a 12-month rolling period. See b)(2)c. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Nitrogen oxides (NO _x) emissions shall not exceed 0.36 ton per month, averaged over a 12-month rolling period. See b)(2)c. below. Volatile organic compound (VOC) emissions shall not exceed 0.14 lb/mmBtu. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b. below.
d.	OAC rule 3745-17-11(B)	See b)(2)f. below.
e.	OAC rule 3745-17-07(A)(1)	See b)(2)g. below.
f.	OAC rule 3745-18-06(E)	The emission limitations of this rule are less stringent than the emission limitations established by OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-31-05(E) (Voluntary restriction to avoid Ohio Significant Impact Modeling for SO ₂)	Facility-wide (B006 and P004) SO ₂ emissions from digester gas usage shall not exceed 39.0 tons per year, based upon a rolling 12-month summation. See B.1. through B.7. above.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies 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. The tons per month limitations for NO_x and CO are based on the emissions unit's potentials to emit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.

- d. The emissions from the digestion process shall be vented to the flare during any instance when digester gas is present in the digester (P004) and Boiler 6 (B006) is not firing digester gas.
 - e. Anaerobic digesters, including all associated equipment and grounds, shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
 - f. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. Process weight is defined in OAC rule 3745-17-01(B)(17).
 - g. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
 - h. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare pilot flame or electric arc ignition when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- c) Operational Restrictions
- (1) Digester gas combusted in this emissions unit shall not exceed 1600 parts per million on a volume basis (ppm_v) of hydrogen sulfide.
 - (2) Digester gas combusted in the flare serving this emissions unit shall not be less than 500 Btu/scf.
 - (3) A pilot flame shall be maintained at all times in the flare's pilot light burner or the arcing of the flare's electric arc ignition system shall pulse continually when the emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall monitor and record hydrogen sulfide concentrations when operating the emissions unit with digester gas using one of the two following options:
 - Option 1: Weekly gas detector tube sampling. The accuracy of gas detector tubes is presumed to be ± 10%, unless the permittee is able to demonstrate better accuracy of the detector tubes compared to a certified gas standard. The permittee shall perform gas detector tube monitoring in accordance with the manufacturer's instructions for use of the detector tubes and associated sampling system. Any deviations from the manufacturer's instructions should be recorded with the concentration results of the sampling.
 - Option 2: Continuous digester gas monitoring system. The permittee may install a sampling and analysis system to continuously monitor and record the H₂S content of the

digester gas. The permittee shall properly install, operate, and maintain a continuous digester gas H₂S monitoring device and recorder that measures and records the H₂S concentrations in the digester gas when the emissions unit is in operation, including periods of startup and shutdown. The H₂S monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 5 and shall be capable of accurately measuring the H₂S concentration. The H₂S monitoring device 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.

Whenever the monitored value for hydrogen sulfide exceeds the lower limit of the accuracy of the monitoring system as measured by either of the above monitoring options, 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 hydrogen sulfide concentration below the maximum 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 the 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. hydrogen sulfide 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.

- (2) The permittee shall maintain monthly records of the heat content of the digester gas, in Btu/scf. Heat content may be measured or it may be estimated from measured CO₂, O₂, and H₂S in digester gas, as follows:

Digester gas heat content (Btu/scf) = [100% - CO₂ (%) - H₂S (ppm) / 10⁴ (%/ppm) - O₂ (%) - (O₂ (%) x 78% N₂ in air / 21% O₂ in air)] x 1000 Btu/scf methane

- (3) The permittee shall maintain daily records of all periods of time during which the electric arc system was inoperable or there was no flare pilot flame when digester gas was present in the digester (P004) and Boiler 6 (B006) was not firing digester gas.
- (4) The permittee shall monitor and record the volume of digester gas flared in standard cubic feet per year, and shall calculate and record the annual heat input to the flare in million Btu.

e) Reporting Requirements

- (1) 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.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(1), d)(2) and d)(3):
- a. all periods of time during which the electric arc system was inoperable or there was no flare pilot flame when digester gas was present in the digester (P004) and Boiler 6 (B006) was not firing digester gas;
 - b. each month during which digester gas with a minimum heat content of less than 500 Btu / scf was burned in this emissions unit;
 - c. each period during which digester gas containing an H₂S concentration greater than allowed by c)(1) (1600 ppm_v) was burned.

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. Emissions Limitation:

SO₂ emissions shall not exceed 2.80 tons per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emissions limitation through the required monitoring and recordkeeping in d)(1) and using the following equation:

$$E = (10^6 \text{ Btu} / 1 \text{ mmBtu}) * (1 / \text{digester gas heat content}) * (\text{H}_2\text{S ppm}_v / 1,000,000) * 0.088 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S} * 1.88 \text{ lbs SO}_2/\text{lb H}_2\text{S} = \text{SO}_2 \text{ lb/mmBtu}$$

Where:

E = SO₂ emissions rate, lb/mmBtu;

Digester gas heat content = average heat content of digester gas in Btu/scf from d)(2); and

H₂S ppm_v = average concentration of H₂S in digester gas, from d)(1).

E = 0.53 lb/mmBtu x annual BTU flared (126,475) / 2000 lbs/1 ton = annual emissions of 33.5 tons per year / 12 months/year, which results in allowable emissions of 2.80 tons per month.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4 and 6 as set forth in 40 CFR, Part 60 Appendix A.

b. Emissions limitation:

CO emissions shall not exceed 1.63 tons per month, averaged over a 12-month rolling period.

Applicable compliance method:

Compliance with the allowable mass emission rate for CO may be determined by the following calculation: CO emissions factor of 0.31 lb/mmBtu (per AP-42 Table 13.5-2, 4/15) x annual BTU flared (126,475 MMBtu/year) / 2000 lbs/1 ton = annual emissions of 19.60 tons per year / 12 months/year, which results in allowable emissions of 1.63 tons per month.

If required, the permittee shall demonstrate compliance with applicable emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

c. Emissions limitation:

NO_x emissions shall not exceed 0.36 tons per month, averaged over a 12-month rolling period.

Applicable compliance method:

Compliance with the allowable mass emission rate for NO_x may be determined by the following calculation: NO_x emissions factor of 0.068 lb/mmBtu (per AP-42



Table 13.5-1, 4/15) x annual BTU flared (126,475 MMBtu/year) / 2000 lbs/1 ton = annual emissions of 4.30 tons per year / 12 months/year, which results in allowable emissions of 0.36 ton per month.

If required, the permittee shall demonstrate compliance with applicable emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

d. Emissions limitation:

VOC emissions shall not exceed 0.14 lb/mmBtu.

Applicable compliance method:

Compliance shall be demonstrated using the emissions factor for VOC from USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Section 13.5 Table 13.5-2 (4/15).

If required, the permittee shall demonstrate compliance with applicable emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25A.

If required, the permittee shall confirm, through the applicable methods and procedures specified in 40 CFR Part 60.18, that the flare's exit velocity and the net heating value of the digester gas conform to the maximum design values specified by the flare manufacturer.

g) Miscellaneous Requirements

- (1) None.