



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

10/24/2016

Certified Mail

Bill Fritz
 Case Farms Winesburg Protein Conversion Plant
 1818 Co Road 160
 Winesburg, OH 44690

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: 0238002005
 Permit Number: P0121765
 Permit Type: Administrative Modification
 County: Holmes

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
Case Farms Winesburg Protein Conversion Plant**

Facility ID:	0238002005
Permit Number:	P0121765
Permit Type:	Administrative Modification
Issued:	10/24/2016
Effective:	10/24/2016
Expiration:	1/13/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
Case Farms Winesburg Protein Conversion Plant

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. F001	11
2. P001	15
3. P002	22
4. P003	29
5. Emissions Unit Group -62.773 mmBtu/hr boilers: B001,B002	36



Authorization

Facility ID: 0238002005
Application Number(s): M0004208
Permit Number: P0121765
Permit Description: Agency-initiated administrative modification to remove quarterly reporting requirements for a NTV facility
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 10/24/2016
Effective Date: 10/24/2016
Expiration Date: 1/13/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Case Farms Winesburg Protein Conversion Plant
1818 Co Road 160
Winesburg, OH 44690

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

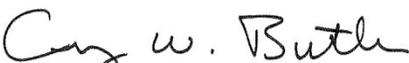
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



Authorization (continued)

Permit Number: P0121765

Permit Description: Agency-initiated administrative modification to remove quarterly reporting requirements for a NTV facility

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

Emissions Unit ID: **F001**
 Company Equipment ID: Fugitive 1
 Superseded Permit Number: P0120716
 General Permit Category and Type: Not Applicable

Emissions Unit ID: **P001**
 Company Equipment ID: P001
 Superseded Permit Number: P0120716
 General Permit Category and Type: Not Applicable

Emissions Unit ID: **P002**
 Company Equipment ID: P002
 Superseded Permit Number: P0120716
 General Permit Category and Type: Not Applicable

Emissions Unit ID: **P003**
 Company Equipment ID: P003
 Superseded Permit Number: P0120716
 General Permit Category and Type: Not Applicable

Group Name: 62.773 mmBtu/hr boilers

Emissions Unit ID:	B001
Company Equipment ID:	Boiler 1
Superseded Permit Number:	P0120716
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Boiler 2
Superseded Permit Number:	P0120716
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Case Farms Winesburg Protein Conversion Plant
Permit Number: P0121765
Facility ID: 0238002005
Effective Date: 10/24/2016

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
Case Farms Winesburg Protein Conversion Plant
Permit Number: P0121765
Facility ID: 0238002005
Effective Date: 10/24/2016

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) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources. These requirements apply to emissions units B001 and B002. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/>.



Final Permit-to-Install and Operate
Case Farms Winesburg Protein Conversion Plant
Permit Number: P0121765
Facility ID: 0238002005
Effective Date: 10/24/2016

C. Emissions Unit Terms and Conditions

1. F001

Operations, Property and/or Equipment Description:

Fugitive emissions from paved roadways and parking areas

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) and OAC rule 3745-31-05(A)(3) June 30, 2008	Develop and implement a site-specific work practice plan designed as described in section d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(4)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
c.	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

The permittee shall develop and implement a site-specific Work Practice Plan designed to minimize or eliminate fugitive dust from the permittees paved roadways and parking areas. This Work Practice Plan shall include, at a minimum, the following elements:

- a. An identification of each segment of paved roadway or parking area for which the plan applies.
- b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways/parking areas. This form/record should include, at a minimum, the following elements:
 - i. Roadway or parking area segment inspected;
 - ii. Date inspected;
 - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why treatment was needed;
 - vi. Date treated;
 - vii. Name of employee who either treated the segment or who can verify that the segment was treated; and
 - viii. Method used to treat the segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA (Northeast District Office) approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Northeast District Office for review

and approval. The permittee can begin using the revised Work Practice Plan once Northeast District Office has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan; and
- b. The date and reason any element of the Work Practice Plan was not implemented.

(4) The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

e) Reporting Requirements

- (1) The permittee submitted their proposed Work Practice Plan dated September 13, 2016. It was received by Ohio EPA's Northeast District Office on September 21, 2016, and approved on October 7, 2016.
- (2) The permittee shall submit annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the annual Permit Evaluation Report (PER).
- (3) 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 emissions unit identified in this permit.



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. None.

g) Miscellaneous Requirements

(1) None.

2. P001

Operations, Property and/or Equipment Description:

PC Plant Cooker Line #1 (4.20 tons finished meal/hr) vented through one Venturi Conditioning Scrubber and then to one 4.0 mmBtu/hr (burner) Regenerative Thermal Oxidizer (RTO) with a packed bed scrubber back-up when RTO is not in service

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. d)(4).

(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) and OAC rule 3745-31-05(A)(3) June 30, 2008	SO ₂ emissions shall not exceed 1.15 tons of SO ₂ per month over a rolling 12-month period. VOC emissions shall not exceed 0.88 ton of VOC per month over a rolling 12-month period. See b)(2)a., b)(2)b., b)(2)d., and b)(2)e.
b.	OAC rule 3745-31-05(F) June 30, 2008	VOC emissions shall be controlled by a regenerative thermal oxidizer (RTO). In the event the RTO is not operational, VOC emissions shall be controlled by a packed bed scrubber. See b)(2)d., b)(2)e., b)(2)f., b)(2)j., and c)(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-15-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)g. and b)(2)h.
e.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)i.

(2) Additional Terms and Conditions

- a. The SO₂ and VOC emissions limitations are based upon the potentials to emit SO₂ and VOC from this emissions unit, assuming 8760 hours of operation per year. Therefore, no monitoring, recordkeeping, reporting requirements, and/or testing are required to demonstrate compliance with the emissions limitations SO₂ and VOC.
- b. The SO₂ emissions from this emissions unit are generated from the conversion of H₂S to SO₂ in the regenerative thermal oxidizer (RTO).
- c. In accordance with OAC rule 3745-15-07(A), except as provided in paragraph (B) of this rule, the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety, or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit, or maintain any such public nuisance.
- d. This emissions unit shall be controlled by a venturi scrubber and regenerative thermal oxidizer (RTO). Vapors from the venturi scrubber shall vent directly to the RTO in accordance with the permittee's application.
- e. The permit for this emissions unit, P001, and emissions units P002 and P003 takes into account the use of a venturi scrubber and regenerative thermal oxidizer (RTO), whenever this emissions unit is in operation. Vapors from the venturi scrubber shall be vented to the RTO.
- f. A two stage, cross-flow, room air scrubber system shall be operated whenever this emissions unit is in operation to induce negative pressure on the interior of the building space housing this emissions unit, to capture and control fugitive low intensity malodors.
- g. The uncontrolled emission rate for these emissions units are not able to be ascertained, and therefore, in accordance with OAC rule 3745-17-11(A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to these emissions units.
- h. The facility is located in Holmes County. It is exempt from Table I requirements per OAC rule 3745-17-11(A)(2)(b).

- i. In accordance with OAC rule 3745-17-07(A)(3)(h), this emissions unit is exempt from the visible particulate emission limitation.
 - j. The RTO shall be operated and maintained as the primary VOC emissions control for this emissions unit. In the event that the RTO is not in service, and this emissions unit is in operation, vapors from the venturi scrubber will be vented to the back-up packed bed scrubber.
- c) Operational Restrictions
- (1) The combustion temperature within the RTO when the emissions units are in operation and venting to the RTO shall be maintained at a minimum temperature of 1150 degrees Fahrenheit.
 - (2) The permittee shall process only fresh materials at this protein conversion facility. For the purposes of compliance with the terms and conditions of this permit, fresh material is defined as any non-rancid animal parts or by-products that are processed within the first 24-hour period following receipt at the facility.
 - (3) The permittee shall vent to the back-up packed bed scrubber during all times the RTO is not in service and the emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall record the combustion temperature within the RTO daily when the emissions unit is in operation. The permittee shall properly install, operate, and maintain a continuous temperature monitor that measures the combustion temperature within the RTO when the emissions units are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. The permittee shall collect and record the following information each day the emissions units are in operation:
 - a. All periods of time, when the emissions units controlled by the RTO were in operation, during which the combustion temperature within the RTO was less than 1150 degrees Fahrenheit;
 - b. A log or record of the operating time for the emissions unit when the associated capture (collection) system and RTO were not in operation; and
 - c. A log or record of the operating time for the emissions unit when it was not vented to the RTO or through the back-up packed bed scrubber.

- (2) Whenever the monitored combustion temperature within the RTO deviates from the minimum allowable temperature of 1150 degrees Fahrenheit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. The date and time the deviation began;
 - b. The magnitude of the deviation at that time;
 - c. The date the investigation was conducted;
 - d. The name(s) of the personnel who conducted the investigation; and
 - e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable 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:

- a. A description of the corrective action;
- b. The date corrective action was completed;
- c. The date and time the deviation ended;
- d. The total period of time (in minutes) during which there was a deviation;
- e. The temperature readings immediately after the corrective action was implemented; and
- f. The name(s) of the personnel who performed the work.

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

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.

- (3) In order to minimize odors, the acceptable range or limit for the recirculating water pressure to the back-up packed bed scrubber, when in operation, shall be based upon the manufacturer's specifications and shall be monitored and recorded, at a minimum, once per operating day.

- (4) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install and Operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any period of time (start time and date, and end time and date) when the emissions unit(s) controlled by the RTO and back-up packed bed scrubber was/were in operation and the process emissions were not vented to the RTO or back-up packed bed scrubber. The notification shall include a copy of such record, including the date(s) and time(s), and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the date of the occurrence.
- (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 emissions unit identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the venturi scrubber during the 12-month reporting period for this/these emissions unit(s):
- a. Any period of time (start time and date, and end time and date) when the emissions unit(s) controlled by the venturi scrubber was/were in operation and the process emissions were not vented to the venturi scrubber;
 - b. Each incident of deviation described in a. (above) where a prompt investigation was not conducted; and
 - c. Each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions units:
- a. Each period of time (start time and date, and end time and date) when the combustion temperature within the RTO was less than 1150 degrees Fahrenheit during any period of time when the emissions unit controlled by the RTO was in operation;



- b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO or to the back-up packed bed scrubber;
- c. Each incident of deviation described in a. or b. (above) where a prompt investigation was not conducted;
- d. Each incident of deviation described in a. or b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable limit, was determined to be necessary and was not taken; and
- e. Each incident of deviation described in a. or b. where proper records were not maintained for the investigation and/or the corrective action(s).

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 1.15 tons of SO₂ per month over a rolling 12-month period.

Applicable Compliance Method:

The above emissions limitations are based on the emissions unit's potential to emit (PTE) for SO₂ and were calculated using the following equation:

$$\text{ton(s) per month} = [(0.75 \text{ lb/ton}) \times (4.2 \text{ tons/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})] \div 12 \text{ months}$$

Where:

0.75 lb/ton = uncontrolled process SO₂ weight-rate based emission factor in pound per ton of finished meal developed by the permittee in the application; and

4.2 tons/hr = the maximum production rate.

- b. Emissions Limitation:

VOC emissions shall not exceed 0.88 ton of VOC per month over a rolling 12-month period.

Applicable Compliance Method:

The above emissions limitations are based on the emissions unit's potential to emit (PTE) for VOC and were calculated using the following equation:



ton(s) per month = $[(0.576 \text{ lb/ton}) \times (4.2 \text{ tons/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})] \div 12 \text{ months}$

Where:

0.576 lb/ton = uncontrolled process VOC weight-rate based emission factor in pound per ton of finished meal developed by the permittee in the application; and

4.2 tons/hr = the maximum production rate.

g) Miscellaneous Requirements

- (1) None.

3. P002

Operations, Property and/or Equipment Description:

PC Plant Cooker Line #2 (2.22 tons finished meal/hr) vented through one Venturi Conditioning Scrubber and then to one 4.0 mmBtu/hr (burner) Regenerative Thermal Oxidizer (RTO) with a packed bed scrubber back-up when RTO is not in service

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. d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	SO ₂ emissions shall not exceed 0.61 ton of SO ₂ per month over a rolling 12-month period. VOC emissions shall not exceed 0.47 ton of VOC per month over a rolling 12-month period. See b)(2)a., b)(2)b., b)(2)d., and b)(2)f.
b.	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 SO ₂ and VOC emissions from this emissions unit since the potential to emit is less than 10 tons per year. See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(F) June 30, 2008	VOC emissions shall be controlled by a regenerative thermal oxidizer (RTO). In the event the RTO is not operational, VOC emissions shall be controlled by a packed bed scrubber. See b)(2)f., b)(2)g., b)(2)h., b)(2)l., and c)(2).
d.	OAC rule 3745-15-07(A)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)i. and b)(2)j.
f.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)k.

(2) Additional Terms and Conditions

- a. The SO₂ and VOC emissions limitations are based upon the potentials to emit SO₂ and VOC from this emissions unit, assuming 8760 hours of operation per year. Therefore, no monitoring, recordkeeping, reporting requirements, and/or testing are required to demonstrate compliance with the emissions limitations SO₂ and VOC.
- b. On February 20, 2013, U.S. EPA approved multiple portions of Ohio Administrative Code (OAC) Chapter 31 as effective June 30, 2008, into Ohio's State Implementation Plan (SIP). As part of this approval, U.S. EPA approved most of OAC rule 3745-31-05. U.S. EPA chose not to approve the less than 10 tons per year Best Available Technology (BAT) exemption in OAC paragraph 3745-31-05(A)(3)(a)(ii) at the time they approved the rest of the rule. Therefore, these BAT emissions limitations apply until 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 State Implementation Plan (SIP).
- c. 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 because potential SO₂ and VOC emissions from this emissions unit are less than 10 tons per year.
- d. The SO₂ emissions from this emissions unit are generated from the conversion of H₂S to SO₂ in the regenerative thermal oxidizer (RTO).
- e. In accordance with OAC rule 3745-15-07(A), except as provided in paragraph (B) of this rule, the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety, or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and

declared to be a public nuisance. It shall be unlawful for any person to cause, permit, or maintain any such public nuisance.

- f. This emissions unit shall be controlled by a venturi scrubber and regenerative thermal oxidizer (RTO). Vapors from the venturi scrubber shall vent directly to the RTO in accordance with the permittee's application.
 - g. The permit for this emissions unit, P002, and emissions units P001 and P003 takes into account the use of a venturi scrubber and regenerative thermal oxidizer (RTO), whenever this emissions unit is in operation. Vapors from the venturi scrubber shall be vented to the RTO.
 - h. A two stage, cross-flow, room air scrubber system shall be operated whenever this emissions unit is in operation to induce negative pressure on the interior of the building space housing this emissions unit, to capture and control fugitive low intensity malodors.
 - i. The uncontrolled emission rate for these emissions units are not able to be ascertained, and therefore, in accordance with OAC rule 3745-17-11(A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to these emissions units.
 - j. The facility is located in Holmes County. It is exempt from Table I requirements per OAC rule 3745-17-11(A)(2)(b).
 - k. In accordance with OAC rule 3745-17-07(A)(3)(h), this emissions unit is exempt from the visible particulate emission limitation.
 - l. The RTO shall be operated and maintained as the primary VOC emissions control for this emissions unit. In the event that the RTO is not in service, and this emissions unit is in operation, vapors from the venturi scrubber will be vented to the back-up packed bed scrubber.
- c) Operational Restrictions
- (1) The combustion temperature within the RTO when the emissions units are in operation and venting to the RTO shall be maintained at a minimum temperature of 1150 degrees Fahrenheit.
 - (2) The permittee shall process only fresh materials at this protein conversion facility. For the purposes of compliance with the terms and conditions of this permit, fresh material is defined as any non-rancid animal parts or by-products that are processed within the first 24-hour period following receipt at the facility.
 - (3) The permittee shall vent to the back-up packed bed scrubber during all times the RTO is not in service and the emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall record the combustion temperature within the RTO daily when the emissions unit is in operation. The permittee shall properly install, operate, and maintain a continuous temperature monitor that measures the combustion temperature within the

RTO when the emissions units are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. The permittee shall collect and record the following information each day the emissions units are in operation:

- a. All periods of time, when the emissions units controlled by the RTO were in operation, during which the combustion temperature within the RTO was less than 1150 degrees Fahrenheit;
 - b. A log or record of the operating time for the emissions units when the associated capture (collection) system and RTO were not in operation, and
 - c. A log or record of the operating time for the emissions unit when it was not vented to the RTO or through the back-up packed bed scrubber.
- (2) Whenever the monitored combustion temperature within the RTO deviates from the minimum allowable temperature of 1150 degrees Fahrenheit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. The date and time the deviation began;
 - b. The magnitude of the deviation at that time;
 - c. The date the investigation was conducted;
 - d. The name(s) of the personnel who conducted the investigation; and
 - e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable 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:

- a. A description of the corrective action;
- b. The date corrective action was completed;
- c. The date and time the deviation ended;
- d. The total period of time (in minutes) during which there was a deviation;

- e. The temperature readings immediately after the corrective action was implemented; and
- f. The name(s) of the personnel who performed the work.

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

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.

- (3) In order to minimize odors, the acceptable range or limit for the recirculating water pressure to the back-up packed bed scrubber, when in operation, shall be based upon the manufacturer's specifications and shall be monitored and recorded, at a minimum, once per operating day.
- (4) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install and Operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any period of time (start time and date, and end time and date) when the emissions unit(s) controlled by the RTO and back-up packed bed scrubber was/were in operation and the process emissions were not vented to the RTO or back-up packed bed scrubber. The notification shall include a copy of such record, including the date(s) and time(s), and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the date of the occurrence.
- (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 emissions unit identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the venturi scrubber during the 12-month reporting period for this/these emissions unit(s):

- a. Any period of time (start time and date, and end time and date) when the emissions unit(s) controlled by the venturi scrubber was/were in operation and the process emissions were not vented to the venturi scrubber;
 - b. Each incident of deviation described in a. (above) where a prompt investigation was not conducted; and
 - c. Each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions units:
- a. Each period of time (start time and date, and end time and date) when the combustion temperature within the RTO was less than 1150 degrees Fahrenheit during any period of time when the emissions unit controlled by the RTO was in operation;
 - b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO or to the back-up packed tower scrubber;
 - c. Each incident of deviation described in a. or b. (above) where a prompt investigation was not conducted;
 - d. Each incident of deviation described in a. or b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable limit, was determined to be necessary and was not taken; and
 - e. Each incident of deviation described in a. or b. where proper records were not maintained for the investigation and/or the corrective action(s).
- 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 0.61 ton of SO₂ per month over a rolling 12-month period.

Applicable Compliance Method:
The above emissions limitations are based on the emissions unit's potential to emit (PTE) for SO₂ and were calculated using the following equation:



$$\text{ton(s) per month} = [(0.75 \text{ lb/ton}) \times (2.22 \text{ tons/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})] \div 12 \text{ months}$$

Where:

0.75 lb/ton = uncontrolled process SO₂ weight-rate based emission factor in pound per ton of finished meal developed by the permittee in the application; and

2.22 tons/hr = the maximum production rate.

b. Emissions Limitation:

VOC emissions shall not exceed 0.47 ton of VOC per month over a rolling 12-month period.

Applicable Compliance Method:

The above emissions limitations are based on the emissions unit's potential to emit (PTE) for VOC and were calculated using the following equation:

$$\text{ton(s) per month} = [(0.576 \text{ lb/ton}) \times (2.22 \text{ tons/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})] \div 12 \text{ months}$$

Where:

0.576 lb/ton = uncontrolled process VOC weight-rate based emission factor in pound per ton of finished meal developed by the permittee in the application; and

2.22 tons/hr = the maximum production rate.

g) Miscellaneous Requirements

- (1) None.

4. P003

Operations, Property and/or Equipment Description:

Blood/feather line (1.8 tons finished meal/hr) vented through one Venturi Conditioning Scrubber and then to one 4.0 mmBtu/hr (burner) Regenerative Thermal Oxidizer (RTO) with a packed bed scrubber back-up when RTO is not in service

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. d)(4).

(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) and OAC rule 3745-31-05(A)(3) June 30, 2008	SO ₂ emissions shall not exceed 0.50 ton of SO ₂ per month over a rolling 12-month period. VOC emissions shall not exceed 0.38 ton of VOC per month over a rolling 12-month period. See b)(2)a., b)(2)b., b)(2)d., and b)(2)f.
b.	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 SO ₂ and VOC emissions from this emissions unit since the potential to emit is less than 10 tons per year. See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(F) June 30, 2008	VOC emissions shall be controlled by a regenerative thermal oxidizer (RTO). In the event the RTO is not operational, VOC emissions shall be controlled by a packed bed scrubber. See b)(2)f., b)(2)g., b)(2)h., b)(2)l., and c)(2).
d.	OAC rule 3745-15-07(A)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)i. and b)(2)j.
f.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)k.

(2) Additional Terms and Conditions

- a. The SO₂ and VOC emissions limitations are based upon the potentials to emit SO₂ and VOC from this emissions unit, assuming 8760 hours of operation per year. Therefore, no monitoring, recordkeeping, reporting requirements, and/or testing are required to demonstrate compliance with the emissions limitations SO₂ and VOC.
- b. On February 20, 2013, U.S. EPA approved multiple portions of Ohio Administrative Code (OAC) Chapter 31 as effective June 30, 2008, into Ohio's State Implementation Plan (SIP). As part of this approval, U.S. EPA approved most of OAC rule 3745-31-05. U.S. EPA chose not to approve the less than 10 tons per year Best Available Technology (BAT) exemption in OAC paragraph 3745-31-05(A)(3)(a)(ii) at the time they approved the rest of the rule. Therefore, these BAT emissions limitations apply until 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 State Implementation Plan (SIP).
- c. 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 because potential SO₂ and VOC emissions from this emissions unit are less than 10 tons per year.
- d. The SO₂ emissions from this emissions unit are generated from the conversion of H₂S to SO₂ in the regenerative thermal oxidizer (RTO).
- e. In accordance with OAC rule 3745-15-07(A), except as provided in paragraph (B) of this rule, the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety, or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and

declared to be a public nuisance. It shall be unlawful for any person to cause, permit, or maintain any such public nuisance.

- f. This emissions unit shall be controlled by a venturi scrubber and regenerative thermal oxidizer (RTO). Vapors from the venturi scrubber shall vent directly to the RTO in accordance with the permittee's application.
 - g. The permit for this emissions unit, P003, and emissions units P001 and P002 takes into account the use of a venturi scrubber and regenerative thermal oxidizer (RTO), whenever this emissions unit is in operation. Vapors from the venturi scrubber shall be vented to the RTO.
 - h. A two stage, cross-flow, room air scrubber system shall be operated whenever this emissions unit is in operation to induce negative pressure on the interior of the building space housing this emissions unit, to capture and control fugitive low intensity malodors.
 - i. The uncontrolled emission rate for these emissions units are not able to be ascertained, and therefore, in accordance with OAC rule 3745-17-11(A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to these emissions units.
 - j. The facility is located in Holmes County. It is exempt from Table I requirements per OAC rule 3745-17-11(A)(2)(b).
 - k. In accordance with OAC rule 3745-17-07(A)(3)(h), this emissions unit is exempt from the visible particulate emission limitation.
 - l. The RTO shall be operated and maintained as the primary VOC emissions control for this emissions unit. In the event that the RTO is not in service, and this emissions unit is in operation, vapors from the venturi scrubber will be vented to the back-up packed bed scrubber.
- c) Operational Restrictions
- (1) The combustion temperature within the RTO when the emissions units are in operation shall be maintained at a minimum temperature of 1150 degrees Fahrenheit.
 - (2) The permittee shall process only fresh materials at this protein conversion facility. For the purposes of compliance with the terms and conditions of this permit, fresh material is defined as any non-rancid animal parts or by-products that are processed within the first 24-hour period following receipt at the facility.
 - (3) The permittee shall vent to the back-up packed bed scrubber during all times the RTO is not in service and the emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall record the combustion temperature within the RTO daily when the emissions unit is in operation. The permittee shall properly install, operate, and maintain a continuous temperature monitor that measures the combustion temperature within the RTO when the emissions units are in operation, including periods of startup and

shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. The permittee shall collect and record the following information each day the emissions units are in operation:

- a. All periods of time, when the emissions units controlled by the RTO were in operation, during which the combustion temperature within the RTO was less than 1150 degrees Fahrenheit;
 - b. A log or record of the operating time for the emissions units when the associated capture (collection) system and RTO were not in operation.
 - c. A log or record of the operating time for the emissions unit when it was not vented to the RTO or through the back-up packed bed scrubber.
- (2) Whenever the monitored combustion temperature within the RTO deviates from the minimum allowable temperature of 1150 degrees Fahrenheit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. The date and time the deviation began;
 - b. The magnitude of the deviation at that time;
 - c. The date the investigation was conducted;
 - d. The name(s) of the personnel who conducted the investigation; and
 - e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable 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:

- a. A description of the corrective action;
- b. The date corrective action was completed;
- c. The date and time the deviation ended;
- d. The total period of time (in minutes) during which there was a deviation;

- e. The temperature readings immediately after the corrective action was implemented; and
- f. The name(s) of the personnel who performed the work.

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

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.

- (3) In order to minimize odors, the acceptable range or limit for the recirculating water pressure to the back-up packed bed scrubber, when in operation, shall be based upon the manufacturer's specifications and shall be monitored and recorded, at a minimum, once per operating day.
- (4) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install and Operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any period of time (start time and date, and end time and date) when the emissions unit(s) controlled by the RTO and back-up packed bed scrubber was/were in operation and the process emissions were not vented to the RTO or back-up packed bed scrubber. The notification shall include a copy of such record, including the date(s) and time(s), and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the date of the occurrence.
- (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 emissions unit identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the venturi scrubber during the 12-month reporting period for this/these emissions unit(s):



- a. Any period of time (start time and date, and end time and date) when the emissions unit(s) controlled by the venturi scrubber was/were in operation and the process emissions were not vented to the venturi scrubber;
 - b. Each incident of deviation described in a. (above) where a prompt investigation was not conducted; and
 - c. Each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions units:
- a. Each period of time (start time and date, and end time and date) when the combustion temperature within the RTO was less than 1150 degrees Fahrenheit during any period of time when the emissions unit controlled by the RTO was in operation;
 - b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO or to the back-up packed tower scrubber;
 - c. Each incident of deviation described in a. or b. (above) where a prompt investigation was not conducted;
 - d. Each incident of deviation described in a. or b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable limit, was determined to be necessary and was not taken; and
 - e. Each incident of deviation described in a. or b. where proper records were not maintained for the investigation and/or the corrective action(s).

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 0.50 ton of SO₂ per month over a rolling 12-month period.

Applicable Compliance Method:

The above emissions limitations are based on the emissions unit's potential to emit (PTE) for SO₂ and were calculated using the following equation:



$$\text{ton(s) per month} = [(0.75 \text{ lb/ton}) \times (1.8 \text{ tons/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})] \div 12 \text{ months}$$

Where:

0.75 lb/ton = uncontrolled process SO₂ weight-rate based emission factor in pound per ton of finished meal developed by the permittee in the application; and

1.8 tons/hr = the maximum production rate.

b. Emissions Limitation:

VOC emissions shall not exceed 0.38 ton of VOC per month over a rolling 12-month period.

Applicable Compliance Method:

The above emissions limitations are based on the emissions unit's potential to emit (PTE) for VOC and were calculated using the following equation:

$$\text{ton(s) per month} = [(0.576 \text{ lb/ton}) \times (1.8 \text{ tons/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})] \div 12 \text{ months}$$

Where:

0.576 lb/ton = uncontrolled process VOC weight-rate based emission factor in pound per ton of finished meal developed by the permittee in the application; and

1.8 tons/hr = the maximum production rate.

g) Miscellaneous Requirements

- (1) None.

5. Emissions Unit Group -62.773 mmBtu/hr boilers: B001,B002

EU ID	Operations, Property and/or Equipment Description
B001	62.773 mmBtu/hr natural gas, LSD, and processed fats-fired boiler
B002	62.773 mmBtu/hr natural gas, LSD, and processed fats-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.

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) OAC rule 3745-31-05(A)(3) June 30, 2008	SO ₂ emissions shall not exceed 1.22 tons of SO ₂ per month over a rolling 12-month period. NO _x emissions shall not exceed 3.64 tons of NO _x per month over a rolling 12-month period. CO emissions shall not exceed 0.85 ton of CO per month over a rolling 12-month period. See b)(2)a., b)(2)b., and c)(2).
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	PE, PM ₁₀ , and PM _{2.5} emissions shall not exceed 0.39 ton of PE, PM ₁₀ , and PM _{2.5} , combined, per month over a rolling 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions shall not exceed 0.13 ton of VOC per month over a rolling 12-month period. See b)(2)c.
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 VOC, PE, PM ₁₀ , and PM _{2.5} emissions from this emissions unit since the potential to emit is less than 10 tons per year. See b)(2)d.
d.	40 CFR Part 60, Subpart Dc (40 CFR 60.40c to 60.48c) In accordance with 40 CFR 60.40c and 60.41c, this emissions unit is a steam generating unit subject to the Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units, constructed after 6/9/89.	The fuel quality requirements of this rule are less stringent than the voluntary operational restriction outlined in c)(2). See b)(2)e., b)(2)f., b)(2)g., and b)(2)h.
e.	OAC rule 3745-17-07(A)(1)	See b)(2)g.
f.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 pound per million Btu of actual heat input when burning either natural gas or low sulfur diesel (LSD) fuel. See b)(2)i.
g.	OAC rule 3745-17-10(C)(2)	PE shall not exceed 0.345 pound per million Btu of actual heat input when burning processed fats. See b)(2)j.
h.	OAC rule 3745-18-06(A)	Fuel burning equipment is exempt from paragraphs (D), (F), and (G) of OAC rule 3745-18-06, and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
i.	OAC rule 3745-18-06(D)	When burning low sulfur diesel fuel, or processed fats, the emission limitation

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T) and the voluntary operational restriction outlined in c)(2).
j.	OAC rule 3745-110-03(B)	<p>NO_x emissions shall not exceed 0.10 pound per million Btu of actual heat input when burning natural gas.</p> <p>NO_x emissions shall not exceed 0.12 pound per million Btu of actual heat input when burning low sulfur diesel fuel.</p> <p>See b)(2)k, b)(2)l, and b)(2)m.</p>
k.	OAC rule 3745-110-03(K)	See b)(2)n.

(2) Additional Terms and Conditions

- a. The annual emissions limitations are based upon the potentials to emit CO and SO₂ from this emissions unit, assuming 8760 hours of operation per year. Therefore, no recordkeeping and/or reporting requirements are required to demonstrate compliance with the emissions limitations for CO and SO₂.
- b. This emissions unit has the potential to emit ten or more tons per year of SO₂, NO_x, and CO.
- c. These Best Available Technology (BAT) emissions limitations apply until 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 State Implementation Plan (SIP).
- d. 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.
- e. The “Best Available Technology” (BAT) control requirement for this emissions unit has been determined to be in compliance with the terms and conditions of this permit. The requirements of OAC rule 3745-31-05(A) also include compliance with 40 CFR Part 60, Subpart Dc.
- f. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by U.S. EPA, 40 CFR Part 60, are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- g. The applicability of OAC rule 3745-17-07(A)(1) and 40 CFR 60.43c(c) for this emissions unit overlap and result in opacity restrictions as follows:

- i. Opacity limitation when firing natural gas and processed fats: Visible Bparticulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
- ii. Opacity limitation when firing fuel oil: Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27 percent opacity. This requirement shall apply at all times, except during periods of startup, shutdown, or malfunction.
- h. Processed fats used as fuel in this emissions unit do not meet the definition of “residual oil” in 40 CFR Part 60, Subpart Dc.
- i. The PE emissions limitation of 0.020 pound per million Btu of actual heat input when burning either natural gas or low sulfur diesel fuel is greater than the potential to emit of this emissions unit when burning either fuel; therefore, no recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limitation.
- j. The PE emissions limitation of 0.345 pound per million Btu of actual heat input when burning processed fats is greater than the potential to emit of this emissions unit when burning processed fats in accordance with the permittee’s application; therefore, no recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limitation.
- k. Any owner or operator of a source (emissions unit) which is subject to the requirements of OAC rule 3745-110-03 shall demonstrate compliance with the applicable emissions limit(s) by performing emission tests in accordance with U.S. EPA Method 7, 7A, 7C, 7D, or 7E, 40 CFR Part 60, Appendix A and any additional approved U.S. EPA methods as applicable.
- l. For the compliance demonstration(s) performed pursuant to OAC rule 3745-110-05(A), the owner or operator shall obtain any additional test data (i.e., flow rates, oxygen concentrations, moisture contents, etc.), continuous diluent monitoring data (carbon dioxide or oxygen), or source fuel usage or horsepower data, concurrent with the required compliance demonstration in order to convert the emission test results or monitoring data to the units of the applicable limit. Compliance demonstrations shall be performed that are representative of the normal operating modes, including fuel types or fuel blends employed and shall exclude periods of startup, shutdown, malfunction, and low load operating conditions.
- m. For OAC rule 3745-110-03(B) compliance demonstration(s) shall be performed while the affected boiler is operating at or as close as possible to its maximum permitted operating capacity.
- n. In lieu of conducting a NO_x RACT study for this emissions unit when using processed fats as fuel, the permittee shall conduct emissions testing when burning processed fats to provide the emissions information required by OAC rule 3745-110-03(J)(1)(g). The emissions testing, described in section f)(2) of

these terms and conditions, shall be used to establish emission factors for NO_x for emissions units B001 and B002 when burning processed fats.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas, low sulfur diesel fuel, and/or processed fats in this emissions unit.
- (2) The quality of low sulfur diesel fuel received for burning in this emissions unit shall have a sulfur content of 0.05 percent by weight or less.
- (3) The quality of the low sulfur diesel fuel burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable sulfur dioxide emissions limitations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the low sulfur diesel fuel burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of LSD fuel received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of LSD fuel and maintain records of the total quantity of LSD fuel received, the permittee's or LSD fuel supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)]. A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the LSD fuel for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of LSD fuel that is burned in this emission unit for each day when the emissions unit is in operation. If additional LSD fuel is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the LSD fuel burned in this emissions unit. A representative grab sample of LSD fuel does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing". The permittee shall maintain records of the total quantity of LSD fuel burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

- c. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A,

Method 19, or the appropriate ASTM methods (such as ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

- (2) The permittee shall record and maintain daily records of the amounts of each fuel combusted in each steam generating unit, except monthly fuel usage records may be maintained where meeting the requirements of 40 CFR 60.48c(g)(2) or (3) and combusting only natural gas, wood, or fuels certified in accordance with 40 CFR 60.48c(f).
- (3) The permittee shall maintain monthly records of the following information:
 - a. The total volume of natural gas (mmft³) burned in this emissions unit;
 - b. The total number of gallons of LSD fuel burned in this emissions unit; and
 - c. The total number of gallons of processed fats burned in this emissions unit.
- (4) The permittee shall perform weekly checks, when an emissions unit is in operation, when the weather conditions allow, and when burning any fuel other than natural gas, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):



- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and
- d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to the Ohio Environmental Protection Agency, Northeast District Office and to:

Ohio Environmental Protection Agency
DAPC – Permit Management Unit
P.O. Box 1049
Columbus, Ohio 43216-1049

The permittee submitted the required reports for emissions unit B001 as follows:

- a. Construction date (submitted August 28, 2015);
 - b. Anticipated start-up date (submitted June 23, 2016);
 - c. Actual start-up date (submitted August 15, 2016); and
 - d. Date of performance testing when burning low sulfur diesel (submitted September 28, 2016, and testing performed October 12, 2016, with Ohio EPA Northeast District Office approval).
- (2) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any fuel burned in this emissions unit other than natural gas, LSD fuel, and/or processed fats. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 45 days after the deviation occurs.
 - (3) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing when LSD fuel and/or processed fats are initially burned in this emissions unit. The notification shall include a copy of such record, including the date(s), and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after either of these fuels are burned.
 - (4) 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 emissions unit identified in this permit.

- (5) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in permit condition d)(4) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- 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 Limitations:
 - SO₂ emissions shall not exceed 1.22 tons of SO₂ per month over a rolling 12-month period.
 - NO_x emissions shall not exceed 3.64 tons of NO_x per month over a rolling 12-month period.
 - CO emissions shall not exceed 0.85 ton of CO per month over a rolling 12-month period.
- Applicable Compliance Methods:
- The above emissions limitations are based on the emissions unit's potential to emit (PTE) for each pollutant and were calculated using the following equations:
- $$\text{ton(s) per month} = [(\text{emission factor}) \times (62.773 \text{ mmBtu/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})] \div 12 \text{ months}$$
- Emission factors:
- SO₂ = 0.053 lb/mmBtu from AP-42, Section 1.3, Fuel Oil Combustion (5/10)
- NO_x = 0.159 lb/mmBtu from an emissions test conducted by the permittee at a similar source using processed fats as fuel until such time an emission factor is established for this emissions unit based upon the emissions testing in section f)(2)
- CO = 0.037 lb/mmBtu from AP-42, Section 1.3, Fuel Oil Combustion (5/10)
- The permittee's application contains calculations of emissions of each pollutant for each fuel type; natural gas, LSD fuel, and/or processed fats. All emission factors utilized in establishing the above emissions limitations represent worst-case emissions for each pollutant.

b. Emissions Limitations:

PE, PM₁₀, and PM_{2.5} emissions shall not exceed 0.39 ton of PE, PM₁₀, and PM_{2.5}, combined, per month over a rolling 12-month period.

VOC emissions shall not exceed 0.13 ton of VOC per month over a rolling 12-month period.

Applicable Compliance Methods:

The above emissions limitations are based on the emissions unit's potential to emit (PTE) for each pollutant and were calculated using the following equations:

ton(s) per month = [(emission factor) x (62.773 mmBtu/hr) x (8760 hrs/yr) x (1 ton/2000 lbs)] ÷ 12 months

Emission factors:

PE, PM₁₀, and PM_{2.5} = 0.017 lb/mmBtu from AP-42, Section 1.3, Fuel Oil Combustion (5/10)

VOC = 0.0055 lb/mmBtu from AP-42, Section 1.4, Natural Gas Combustion (7/98)

The permittee's application contains calculations of emissions of each pollutant for each fuel type; natural gas, LSD fuel, and/or processed fats. All emission factors utilized in establishing the above emissions limitations represent worst-case emissions for each pollutant.

c. Emissions Limitation:

Visible particulate emissions from any stack when burning natural gas or processed fats shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emissions Limitation:

Visible particulate emissions from any stack when burning low sulfur diesel fuel shall not exceed 20 percent opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27 percent opacity.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emissions Limitation:

PE shall not exceed 0.020 pound per million Btu of actual heat input when burning either natural gas or LSD fuel.

Applicable Compliance Method:

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

f. Emissions Limitation:

PE shall not exceed 0.345 pound per million Btu of actual heat input when burning processed fats.

Applicable Compliance Method:

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

g. Emissions Limitations:

NOx emissions shall not exceed 0.10 pound per million Btu of actual heat input when burning natural gas.

NOx emissions shall not exceed 0.12 pound per million Btu of actual heat input when burning LSD fuel.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the results of the exhaust gas emission testing specified in b)(2)k, b)(2)l, b)(2)m and f)(2) in accordance with paragraphs (A), (C) and (D) of OAC rule 3745-110-05, which are established to demonstrate compliance with the emissions limitations.

(2) The permittee shall conduct, or have conducted, emission testing of the mass emission rate(s) for NOx emissions for both of these emissions units (B001 and B002) in accordance with the following requirements:

a. The emission testing when burning natural gas shall be conducted within 180 days after initial usage of natural gas in this emissions unit.

- b. The emission testing when burning low sulfur diesel fuel shall be conducted within 90 days after initial usage of low sulfur diesel fuel in this emissions unit.
- c. The emission testing when burning processed fats shall be conducted within 90 days after initial usage of processed fats as fuel in this emissions unit.
- d. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) in OAC rule 3745-110-03(B) for NO_x emissions from burning natural gas and LSD fuel in lb/mmBtu of actual heat input.
- e. The following test methods shall be employed to demonstrate compliance with the allowable emission rates for NO_x:
 - i. Method 7, 7A, 7C, 7D, or 7E, 40 CFR Part 60, Appendix A; and
 - ii. Methods 1 through 4, 40 CFR Part 60, Appendix A, for sample point location(s), exhaust flow rate, moisture content, and any additional approved U.S. EPA methods as applicable.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- f. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA, Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emissions test.
- h. Personnel from the Ohio EPA shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- i. A comprehensive written report of the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 45 days following completion of the



tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) Modeling for NO_x emissions was conducted in accordance with Ohio EPA's Engineering Guide 69 because potential NO_x emissions from this emissions unit exceed the "Ohio Modeling Significant Emission Rate" of 40 tons per year. Modeling was performed using the Screen3 programs and inputs from the permittee's application. Based upon the modeling, this emissions unit is below the "Generally Acceptable Incremental Impact" for NO_x. The permittee is hereby advised that changes in the exhaust and/or building parameters that would affect the modeling results may require the permittee to apply for and obtain a new PTIO.