State of Ohio Environmental Protection Agency

STREET ADDRESS:
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Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

12/18/2008

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Mr. Paul Curtis
Endres Processing Ohio, LLC
13420 Courthouse Blvd.
Rosemount, MN 55068

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0388010003
Permit Number: P0103896
Permit Type: OAC Chapter 3745-31 Modification
County: Wyandot

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

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. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install
for
Endres Processing Ohio, LLC

Facility ID: 0388010003
Permit Number: P0103896
Permit Type: OAC Chapter 3745-31 Modification
Issued: 12/18/2008
Effective: 12/18/2008

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Endres Processing Ohio, LLC

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Authorization

Facility ID: 0388010003
Facility Description: Bakery and food byproduct recycling to produce animal feed.
Application Number(s): A0035971, A0036286
Permit Number: P0103896
Permit Description: Chapter 31 modification to address increased raw material throughput through P901 and P902; installation of wet scrubber, wet ESP and regenerative thermal oxidizer; allow for the burning of paper and plastic material in addition to sawdust.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $4,725.00
Issue Date: 12/18/2008
Effective Date: 12/18/2008

This document constitutes issuance to:

Endres Processing Ohio, LLC
7150 SH 199
Upper Sandusky, OH 43351

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0103896
Permit Description: Chapter 31 modification to address increased raw material throughput through P901 and P902; installation of wet scrubber, wet ESP and regenerative thermal oxidizer; allow for the burning of paper and plastic material in addition to sawdust.

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

Emissions Unit ID:	**F002**
Company Equipment ID:	Raw Material Mixing and Storage Operations
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F003**
Company Equipment ID:	Raw Material Grinding and Conveyance
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F004**
Company Equipment ID:	Finished Feed Processing and Handlling
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F005**
Company Equipment ID:	Finished Feed Storage Piles
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F006**
Company Equipment ID:	Finished Feed Loading
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F007**
Company Equipment ID:	Unpaved Roadways and Parking Areas
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P903**
Company Equipment ID:	Sawdust Receiving and Storage
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable

Group Name: Animal feed drying/processing

Emissions Unit ID:	
Company Equipment ID:	Animal Feed Dryer and Processing Line No. 1
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	
Company Equipment ID:	Animal Feed Dryer and Processing Line No. 2
Superseded Permit Number:	03-13687
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted

(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. F002, Raw Material Mixing and Storage Operations

Operations, Property and/or Equipment Description:

Raw material storage piles

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the air contaminant(s) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Emissions unit F002 emits particulate emissions (also referred to as total suspended particulate or particulate matter) which is an air contaminant that does not involve an established NAAQS.

b. This emissions unit is exempt from the visible particulate emissions (PE) limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This emissions unit 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

2. F003, Raw Material Grinding and Conveyance

Operations, Property and/or Equipment Description:

Raw material grinding and conveyance

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	None [see b)(2)a.]
b.	OAC rule 3745-17-07(B)	None [see b)(2)b.]
c.	OAC rule 3745-17-08(B)	None [see b)(2)c.]

(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the air contaminant(s) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Emissions unit F003 emits particulate emissions (also referred to as total suspended particulate or particulate matter) which is an air contaminant that does not involve an established NAAQS.

b. This emissions unit is exempt from the visible particulate emissions (PE) limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This emissions unit 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

3. F004, Finished Feed Processing and Handlling

Operations, Property and/or Equipment Description:

Finished feed processing and handling

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	None [see b)(2)a.]
b.	OAC rule 3745-17-07(B)	None [see b)(2)b.]
c.	OAC rule 3745-17-08(B)	None [see b)(2)c.]

(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the air contaminant(s) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Emissions unit F004 emits particulate emissions (also referred to as total suspended particulate or particulate matter) which is an air contaminant that does not involve an established NAAQS.

b. This emissions unit is exempt from the visible particulate emissions (PE) limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This emissions unit 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

4. F005, Finished Feed Storage Piles

Operations, Property and/or Equipment Description:

Finished feed storage piles

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	None see b)(2)a.
b.	OAC rule 3745-17-07(B)	None see b)(2)b.
c.	OAC rule 3745-17-08(B)	None see b)(2)c.

(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the air contaminant(s) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Emissions unit F005 emits particulate emissions (also referred to as total suspended particulate or particulate matter) which is an air contaminant that does not involve an established NAAQS.

b. This emissions unit is exempt from the visible particulate emissions (PE) limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This emissions unit 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

5. F006, Finished Feed Loading

Operations, Property and/or Equipment Description:

Finished feed truck loading

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	None [see b)(2)a.]
b.	OAC rule 3745-17-07(B)	None [see b)(2)b.]
c.	OAC rule 3745-17-08(B)	None [see b)(2)c.]

(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the air contaminant(s) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Emissions unit F006 emits particulate emissions (also referred to as total suspended particulate or particulate matter) which is an air contaminant that does not involve an established NAAQS.

b. This emissions unit is exempt from the visible particulate emissions (PE) limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This emissions unit 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

6. F007, Unpaved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Unpaved roadways and parking areas

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	None [see b)(2)a.]
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b.
c.	OAC rule 3745-17-07(B)	None [see b)(2)c.]
d.	OAC rule 3745-17-08(B)	None [see b)(2)d.]

(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of particulate matter ten microns or less in size (PM10) from this emissions unit since the uncontrolled potential to emit for PM10 is less than ten tons per year.

c. This emissions unit is exempt from the visible particulate emissions (PE) limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

d. This emissions unit 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

7. P903, Sawdust Receiving and Storage

Operations, Property and/or Equipment Description:

Sawdust receiving and storage

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	None [see b)(2)a.]
b.	OAC rule 3745-17-11(A)	7.84 pounds particulate emissions (PE) per hour [see b)(2)b.]
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule [see b)(2)c.]
d.	OAC rule 3745-17-07(B)	None [see b)(2)d.]
e.	OAC rule 3745-17-08(B)	None [see b)(2)e.]

(2) Additional Terms and Conditions

a. The “Best Available Technology (BAT)” requirements under OAC rule 3745-31-05(A)(3) are not applicable to the air contaminant(s) emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Emissions unit P903 emits particulate emissions (also referred to as total suspended particulate or particulate matter) which is an air contaminant that does not involve an established NAAQS.

b. Emissions unit P903 involves both fugitive and stack emissions of particulate emissions (PE). Stack emissions are emitted from a cyclone for a sawdust storage bin serving the dryer burner on line #1 and stack emissions from a sock filter for a sawdust storage bin serving the dryer burner on line #2. The hourly emission limitation of 7.84 pounds PE per hour applies to the combined emission rate from the cyclone and sock filter.

Fugitive emissions of PE are generated by the transfer or “drop-out” of material from the storage bins prior to being fed to the dryer burners.

c. Emissions unit P903 involves stack emissions from a cyclone for a sawdust storage bin serving the dryer burner on line #1 and stack emissions from a sock filter for a sawdust storage bin serving the dryer burner on line #2. Stack emissions from both the cyclone and the sock filter exhaust inside a building. For purposes of demonstrating compliance with the visible particulate emissions limitation, opacity due solely to the operation of this emissions unit shall be determined by measuring the opacity emitted from the building containing the cyclone and sock filter.

d. This emissions unit is exempt from the visible particulate emissions (PE) limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

e. This emissions unit 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with operation of the cyclone and/or sock filter for this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions; and

e. any corrective actions taken to minimize the abnormal visible emissions.

The observer does not have to document the exact start and end times for the visible emissions observed under item (d) above or continue the daily check until the visible emissions are no longer observed. The observer may indicate that the visible emissions were 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 minimize abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with operation of the cyclone and/or sock filter for this emissions unit and (b) describe any corrective actions taken to minimize the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation
7.84 pounds PE per hour

Applicable Compliance Method
The permittee shall demonstrate compliance with the hourly limitation by multiplying a maximum hourly throughput rate of 2.63 tons sawdust and an emission factor of 1.0 lb PE per ton (FIRE Data System 6.25, 9/04), applying a "worst-case" control factor of (1- 0.8) for 80% control efficiency for use of cyclone (sock filter achieves a higher control efficiency). If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1- 5.

b. Emission Limitation
Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule [see b)(2)c.].

Applicable Compliance Method
If required, compliance with the visible emission limitation specified above shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group - Animal feed drying/processing: P901, P902,

EU ID	Operations, Property and/or Equipment Description
P901	Animal feed drier and processing line 1
P902	Animal feed drier and processing line 2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)(g); d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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 3745-31-10 through 20 for emissions units P901 and P902, combined	See b)(2)a. 16.79 lbs nitrogen oxides (NOx)/hour, 73.54 tons NOx per rolling, 12-month period 2.02 lbs volatile organic compounds (VOC)/hour, 8.85 tons VOC per rolling, 12-month period
b.	OAC rule 3745-31-05(A)(3) for emissions units P901 and P902, combined	13.86 lbs carbon monoxide (CO) per hour, 60.71 tons CO per year See b)(2)b. 1.22 lbs filterable particulate matter 10 microns or less in size (PM10) per hour, 5.34 tons PM10 per year [see b)(2)c.] Visible particulate emissions (PE) shall not exceed 5% opacity as a six-minute average from the regenerative thermal oxidizer (RTO) except during burn-out when the visible PE shall not exceed 20% opacity as a six-minute average Visible fugitive particulate emissions from the building enclosure due solely to the operation of this emissions unit shall not exceed 10% opacity as a six-minute

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		average See b)(2)b., b)(2)d., and b)(2)(e).
c.	OAC rule 3745-17-11(A) for emissions units P901 and P902, combined	See b)(2)f.
d.	OAC rule 3745-17-07(A) for emissions units P901 and P902, combined	See b)(2)g.
e.	OAC rule 3745-17-08(A)	See b)(2)h.
f.	OAC rule 3745-17-07(B	See b)(2)i.
g.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(5).

(2) Additional Terms and Conditions

a. Permit to install (PTI) 03-13687 (issued on 02/04/2003 and administratively modified on 10/04/07) established "Best Available Control Technology" (BACT) on emissions units P901 and P902. Based on the "Prevention of Significant Deterioration" (PSD) analysis BACT was determined to be the use of a regenerative thermal oxidizer (RTO) for VOC control. The permittee will continue to be required to comply with the BACT requirements established under PTI 03-13687.

The RTO shall meet the following requirements for VOC emissions from emission units P901 and P902, combined:

i. minimum VOC destruction efficiency of 95%.

The PSD analysis determined that no control methods are cost-effective for BACT for NOx emissions.

b. Best available technology (BAT) for emissions units P901 and P902 combined, has been determined to be a CO emission rate of 13.86 lbs CO/hour and an associated RTO minimum operating temperature of 1470 degrees Fahrenheit.

c. All emissions of particulate matter are PM10.

d. Permit to Install P0103896 for air contaminant sources P901 and P902 takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for filterable PM10 emissions:

i. Restrict filterable PM10 emissions from P901 and P902 combined;

ii. Use of a control system consisting of two cyclones, wet scrubber, wet electrostatic precipitator and RTO, with an overall system control efficiency of 98% to control filterable PM10 emissions;

iii. Filterable PM10 emissions from the RTO shall not exceed allowable rates of 1.22 lbs PM10 per hour and 5.34 tons PM10 per year;

iv. Visible particulate emissions shall not exceed 5% opacity as a six minute average from the RTO except during "burn-out" when visible particulate emissions shall not exceed 20% opacity as a six minute average;

v. Use of building enclosure for controlling fugitive PM10 emissions from emission units P901 and P902;

vi. Visible fugitive particulate emissions from the building enclosure due solely to the operation of this emissions unit shall not exceed 10% opacity as a six-minute average.

e. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions units P901 and P902. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). This determination is based on all emissions of particulate matter being PM10 and the established PM10 limitation being more restrictive that particulate emissions limitation established by OAC rule 3745-17-11(B). Particulate emissions (PE) measured using Method 5 of 40 CFR Part 60, Appendix A would be equivalent to the filterable particulates measured using Method 201/201A of 40 CFR, Part 51, Appendix M.

g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

h. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

i. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

c) Operational Restrictions

(1) The permit to install for emissions units P901 and P902 was evaluated based on the raw materials consisting of sawdust, paper, plastics, wheat midds and bakery by-products. Bakery by-products consist of breads, pizza/pasta, cookies/crackers, cereals, jellies, candies, and other grain based materials. Prior to any change (or any other physical change in, or change in the method of operation) in raw materials, the permittee shall conduct an evaluation to determine if the change would constitute a "modification" as defined in OAC rule 3745-31-01. If the change(s) in raw materials or any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final permit to install modification prior to the change. The permittee shall collect, record and retain any information and the final determination when modification evaluations are performed.

(2) The cyclones, wet scrubber, wet electrostatic precipitator and thermal oxidizer serving these emissions units shall be employed at all times when either of these emissions units are in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall document all times the cyclones, wet scrubber, wet electrostatic precipitator and thermal oxidizer serving these emissions units was not employed when either of these emissions units were in operation.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the regenerative thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s). The acceptable operating temperature shall be 1470 degrees Fahrenheit. These records shall be maintained at the facility for a period of no less than 3 years.

(3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the regenerative thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and the operating manuals. The acceptable operating temperature operating shall be 1470 degrees Fahrenheit. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the regenerative thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the acceptable operating temperature of 1470 degrees Fahrenheit; and

b. a log or record of the operating time for the capture (collection) system, regenerative thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

Whenever the monitored combustion temperature within the regenerative thermal oxidizer deviates from the operating temperature value specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

c. the date and time the deviation began;

d. the magnitude of the deviation at that time;

e. the date the investigation was conducted;

f. the name(s) of the personnel who conducted the investigation; and

g. 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 in conformance with the acceptable temperature value specified above, 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:

h. a description of the corrective action;

i. the date corrective action was completed;

j. the date and time the deviation ended;

k. the total period of time (in minutes) during which there was a deviation;

l. the temperature readings immediately after the corrective action was implemented; and

m. 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 operating temperature requirement is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature value based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the operating temperature value will not

constitute a relaxation of the monitoring requirements and may be incorporated into this permit by means of an administrative modification.

(4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the following when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. :

a. pressure drop across the scrubber (in inches of water);

b. the scrubber liquid flow rate (in gallons per minute);

c. the wet ESP secondary voltage, in kilovolts; and

d. the current, in milliamps, for each of the fields in the wet ESP,

The permittee shall record the pressure drop across the scrubber, the scrubber liquid=s flow rate, the wet ESP secondary voltage and current for each field, on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s). The acceptable range(s) and/or limit(s) for the pressure drop across the scrubber, scrubber liquid flow rate, wet ESP secondary voltage, and current settings are indicated below.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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:

e. the date and time the deviation began;

f. the magnitude of the deviation at that time;

g. the date the investigation was conducted;

h. the name(s) of the personnel who conducted the investigation; and

i. 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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:

j. a description of the corrective action;

k. the date the corrective action was completed;

l. the date and time the deviation ended;

m. the total period of time (in minutes) during which there was a deviation;

n. the pressure drop and flow rate readings immediately after the corrective action was implemented;

o. the secondary voltage and current readings for each field immediately after the corrective action was implemented; and

p. 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 acceptable range(s) and/or limit(s) for pressure drop across the scrubber, the scrubber liquid=s flow rate, the wet ESP secondary voltage and current for each field are as follow:

Wet scrubber pressure drop range:	0 - 20.5 inches of water
Wet scrubber flow rate:	400 gallons per minute (minimum)
Wet ESP secondary voltage range:	30 - 53 kilovolts
Wet ESP secondary current range:	30 - 450 milliamps

These range(s) and/or limit(s) for the pressure drop across the scrubber, the scrubber liquid=s flow rate, the wet ESP secondary voltage and current for each field are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range(s) or limit(s) for the pressure drop across the scrubber, the scrubber liquid=s flow rate, the wet ESP secondary voltage and current for each field based upon information obtained during future emission tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range(s) or limit(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclones #1 and #2 when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across cyclones #1 and #2 on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s). The acceptable range(s) for the pressure drop across the cyclone(s) are indicated below.

Whenever the monitored value for the pressure drop deviates from the range(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The acceptable ranges for pressure drop for cyclones #1 and #2 are as follow:

Cyclone #1: 3.5 – 5.5 inches of water

Cyclone #2: 4.0 – 6.0 inches of water

This range(s) on the pressure drop across cyclones #1 and #2 is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(6) Modeling to demonstrate compliance with, the AToxic 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 permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by

OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would 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 permit to install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the regenerative thermal oxidizer during the operation of the emissions unit(s):

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the regenerative thermal oxidizer was more than 50 degrees Fahrenheit below the operating temperature of 1470 degrees Fahrenheit.

b. each 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 regenerative thermal oxidizer;

c. an identification of each incident of deviation described in Aa@ or “b” (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in Aa@ or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in Aa@ or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the wet scrubber and wet ESP during the operation of the emissions unit(s):

a. Each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the appropriate range(s) or limit(s) specified by this permit.

b. Each period of time (start time and date, and end time and date) when the secondary voltage and current for each field within the ESP was outside of the appropriate range(s) or limit(s) specified by this permit.

c. An identification of each incident of deviation described in “a” and/or “b” where a prompt investigation was not conducted;

d. An identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken;

e. An identification of each incident of deviation described in "b" where prompt corrective action, that would bring the ESP into compliance with the acceptable range(s) or limit(s) for secondary voltage and current, was determined to be necessary and was not taken; and

f. An identification of each incident of deviation described in "a" and/or "b" 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.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of cyclones #1 and #2 during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across cyclones #1 and/or #2 was outside of the acceptable range(s);

b. an identification of each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in Aa@ 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.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency requirements and the allowable mass emission rates for VOC, Filterable PM10, NOx and CO.*

b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for Filterable PM10, Methods 201/201A of 40 CFR Part 51, Appendix M; for NOx, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A; for CO, Aethods 1-4 and 10 of 40 CFR Part 60, Appendix A; and for VOC, Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the destruction efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

d. The test(s) shall be conducted while emissions units P901 and P902 are operating at or near their maximum raw material combined capacity of 30 tons/hour and their maximum solid fuel throughput capacity of 2.63 tons/hr unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

*The permittee has fulfilled the emission testing requirements of this permit by stack testing which was performed on 11/14/07 and 5/21/08.

(2) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation
2.02 lbs VOC/hour and 8.85 tons VOC per rolling, 12-month period for emission units P901 and P902, combined

Applicable Compliance Method
Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25 or 25A (see Testing Requirements in f)(1)).

The ton per year emission limitation was developed by multiplying the pound per hour limitation by a maximum operating schedule of 8760 hours per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual emission limitation.

b. Emission Limitation
16.79 lbs NOx/hour and 73.54 tons NOx per rolling, 12-month period for emission units P901 and P902, combined

Applicable Compliance Method
Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 7 (see Testing Requirements in f)(1)).

The ton per year emission limitation was developed by multiplying the pound per hour limitation by a maximum operating schedule of 8760 hours per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual emission limitation.

c. Emission Limitation
13.86 lbs carbon monoxide (CO)/hour, 60.71 tons CO/year

Applicable Compliance Method
Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 10 (see Testing Requirements in f)(1)).

The ton per year emission limitation was developed by multiplying the pound per hour limitation by a maximum operating schedule of 8760 hours per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual emission limitation.

d. Emission Limitation
1.22 lbs filterable PM10/hour, 5.34 tons filterable PM10/year

Applicable Compliance Method
Compliance with the lb/hr filterable PM10 limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 51, Appendix M, Methods 201/201A (see Testing Requirements in f)(1)).

The ton per year emission limitation was developed by multiplying the pound per hour limitation by a maximum operating schedule of 8760 hours per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual emission limitation.

e. Emission Limitation
Visible PE shall not exceed 5% opacity as a six-minute average from the regenerative thermal oxidizer (RTO) except during burn-out when the visible PE shall not exceed 20% opacity as a six-minute average

Applicable Compliance Method
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

f. Emission Limitation
Visible fugitive particulate emissions from the building enclosure due solely to the operation of this emissions unit shall not exceed 10% opacity as a six-minute average

Applicable Compliance Method
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.