



State of Ohio Environmental Protection Agency

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50 W. Town St., Suite 700
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P.O. Box 1049
Columbus, OH 43216-1049

4/6/2009

JOHN E RUDOLPH
RUDOLPH FOODS
PO BOX 509
LIMA, OH 45802

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0302000214
Permit Number: P0104734
Permit Type: Administrative Modification
County: Allen

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final 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.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO 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

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 www.epa.state.oh.us/dapc.

Sincerely,

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

Cc: Ohio EPA-NWDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
RUDOLPH FOODS**

Facility ID: 0302000214
Permit Number: P0104734
Permit Type: Administrative Modification
Issued: 4/6/2009
Effective: 4/6/2009
Expiration: 4/6/2014



Air Pollution Permit-to-Install and Operate
for
RUDOLPH FOODS

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Permit Number: P0104734
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Authorization

Facility ID: 0302000214
Application Number(s): M0000418
Permit Number: P0104734
Permit Description: Administrative Modification to regroup units according to controlled and uncontrolled and set new emission limits for the uncontrolled.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 4/6/2009
Effective Date: 4/6/2009
Expiration Date: 4/6/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RUDOLPH FOODS
4475 BELLEFONTAINE ROAD
LIMA, OH 45804

of a Permit-to-Install and Operate 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 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

Chris Korleski
Director



Authorization (continued)

Permit Number: P0104734
Permit Description: Administrative Modification to regroup units according to controlled and uncontrolled and set new emission limits for the uncontrolled.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID: P033
Company Equipment ID: Large Fryer
Superseded Permit Number: P0086617
General Permit Category and Type: Not Applicable

Group Name: Controlled Super Dryers

Emissions Unit ID:	P020
Company Equipment ID:	Super Dryer 19
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	Super Dryer 20
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	Super Dryer 21
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	Super Dryer 26
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	Super Dryer 27
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P029
Company Equipment ID:	Super Dryer 28
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Small Dryers

Emissions Unit ID:	P002
Company Equipment ID:	small dryer 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	small dryer 2



Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	small dryer 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	small dryer 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	small dryer 5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	small dryer 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	small dryer 7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	small dryer 8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	small dryer 9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	small dryer 10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	small dryer 11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	small dryer 12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	small dryer 13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015



Company Equipment ID:	small dryer 14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	small dryer 15
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	small dryer 16
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	small dryer 17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	small dryer 18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Uncontrolled Super Dryers

Emissions Unit ID:	P023
Company Equipment ID:	super dryer 22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	super dryer 23
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	Super Dryer 24
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	super dryer 25
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	super dryer 29
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	super dryer 30
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032



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Company Equipment ID:	super dryer 31
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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Final Permit-to-Install and Operate

Permit Number: P0104734

Facility ID: 0302000214

Effective Date: 4/6/2009

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 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 Ohio EPA DAPC, Northwest District Office 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



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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.



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Effective Date: 4/6/2009

B. Facility-Wide Terms and Conditions



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Division of Air Pollution Control

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Effective Date: 4/6/2009

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.

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.

None.



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Effective Date: 4/6/2009

C. Emissions Unit Terms and Conditions



1. P033, Large Fryer

Operations, Property and/or Equipment Description:

Large Deep-fat Fryer (Pork Rinds) - 2525 lb/hr capacity - 1.5 mmBtu/hr (Natural Gas fired)

- 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).

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.

None.

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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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)	0.81 lb particulate matter of 10 microns or less (PM ₁₀)/hr and 3.55 tons PM ₁₀ /yr (non-combustion emissions)[See b)(2)b.]
b. OAC rule 3745-17-07 (A)	See b)(2)a. and b)(2)c. Visible particulate emissions shall not exceed 20 percent opacity, as a six -minute average, except as provided by rule.
c. OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE) /mmBtu of actual heat input (combustion emissions)

Additional Terms and Conditions

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-10(B)(1).

All emissions of particulate matter are PM₁₀.



Best Available Technology (BAT) control requirements for the control of particulate matter from this emissions unit shall be the use of mist eliminator filters.

c) Operational Restrictions

The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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:

The color of the emissions;

Whether the emissions are representative of normal operations;

If the emissions are not representative of normal operations, the cause of the abnormal emissions;

The total duration of any visible emission incident; and

Any corrective actions taken to minimize or eliminate the abnormal visible emissions.

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

For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:

0.81 lb PM₁₀ /hr
 3.55 tons PM₁₀ /yr

Applicable Compliance Method:

Compliance with the hourly PM₁₀ emissions limit was established in accordance with the results of emissions testing (October 2004). If required, the permittee shall again demonstrate compliance with the PM₁₀ limitation, by testing in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

Emission Limitation:

0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (1470 cu. ft./hr) by the appropriate emission factor from AP-42, Table 1.4-2 (revised 7/98) [1.9 lbs PE (filterable)/mmcf.] and dividing by the maximum heat input capacity of the burner(s) (1.5 mmBtu/hr). If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(9).

g) Miscellaneous Requirements

None.



2. Emissions Unit Group - Controlled Super Dryers: P020, P021, P022, P027, P028, P029,

EU ID	Operations, Property and/or Equipment Description
P020	Raw Pork Dryer - Batch (Super Dryer 19) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P021	Raw Pork Dryer - Batch (Super Dryer 20) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P022	Raw Pork Dryer - Batch (Super Dryer 21) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P027	Raw Pork Dryer - Batch (Super Dryer 26) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P028	Raw Pork Dryer - Batch (Super Dryer 27) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P029	Raw Pork Dryer - Batch (Super Dryer 28) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired

- 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).

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.

None.

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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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)	0.23 lb particulate matter less than 10 microns (PM ₁₀)/hr and 1.01 tons PM ₁₀ /yr individually [See b)(2)d.]
	Visible particulate emissions shall not exceed 5 percent opacity, as a six -minute average
	0.40 lb organic compounds (OC)/hr and 1.75 ton OC/yr individually



Applicable Rules/Requirements

Applicable Emissions Limitations/Control Measures

- b. OAC rule 3745-17-07 (A)
- c. OAC rule 3745-17-11(B)

See b)(2)a. and b)(2)c.
See b)(2)b.
See b)(2)b.

Additional Terms and Conditions

The hourly OC emission limitation represents the potential to emit for each emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

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

Best Available Technology (BAT) control requirements for each emissions unit has been determined to be the use of an add-on mist eliminator achieving a minimum of 80 percent control efficiency for particulate matter.

All emissions of particulate matter are assumed to be PM₁₀.

c) Operational Restrictions

The pressure drop across the mist eliminator for each emissions unit shall be maintained within 0.05-1.5 inches of water while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the mist eliminator while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the mist eliminator on a daily basis.

The permittee shall perform weekly checks, for each emissions unit while it is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each 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:

the color of the emissions;

whether the emissions are representative of normal operations;

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

the total duration of any visible emission incident; and

any corrective actions taken to minimize or eliminate the abnormal visible emissions.



e) Reporting Requirements

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 PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:

0.23 lb PM₁₀/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly PM₁₀ limitation above based upon the results of emission testing conducted in accordance with Methods 1-4 and 201 and 202 of 40 CFR, Part 51, Appendix M [See f)(2) and f)(3)].

The hourly PM₁₀ emissions limitation was established by applying an 80% control efficiency for the use of a mist eliminator to a maximum uncontrolled emissions rate of 1.15 pounds PM₁₀ per hour, as established by the results of emissions testing (October 2004) on a similar unit.

Emission Limitation:

0.40 lb OC /hr

Applicable Compliance Method:

The hourly OC emissions limit represents the potential to emit and was established in accordance with the results of emissions testing (October 2004) on a similar unit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

Emission Limitation:

1.01 tons PM₁₀ /yr
1.75 tons OC /yr

Applicable Compliance Method:

As long as compliance with the hourly limitations is maintained, compliance with the annual limitations shall be assumed (the annual limitations were calculated by multiplying the hourly limitations by 8760, and then dividing by 2000).

Emission Limitation:



Visible particulate emissions shall not exceed 5 percent opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the test method and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

The emission testing shall be conducted within 5 years after issuance of this permit. The emissions testing shall be conducted on at least one of the following emissions units: P020, P021, P022, P027, P028, and P029.

The emission testing shall be conducted to demonstrate compliance with:

the allowable mass emission rate for PM₁₀

the visible particulate emissions opacity limitation

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate and visible emissions:

PM₁₀: Methods 201 and 202 of 40 CFR Part 51, Appendix M.

Visible particulate emissions: Method 9, 40 CFR, Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest 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 test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) 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.

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 Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where



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warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).

g) Miscellaneous Requirements

None.



3. Emissions Unit Group - Small Dryers: P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019,

EU ID	Operations, Property and/or Equipment Description
P002	Raw Pork Dryer - Batch (Small Dryer 1) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P003	Raw Pork Dryer - Batch (Small Dryer 2) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P004	Raw Pork Dryer - Batch (Small Dryer 3) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P005	Raw Pork Dryer - Batch (Small Dryer 4) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P006	Raw Pork Dryer - Batch (Small Dryer 5) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P007	Raw Pork Dryer - Batch (Small Dryer 6) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P008	Raw Pork Dryer - Batch (Small Dryer 7) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P009	Raw Pork Dryer - Batch (Small Dryer 8) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P010	Raw Pork Dryer - Batch (Small Dryer 9) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P011	Raw Pork Dryer - Batch (Small Dryer 10) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P012	Raw Pork Dryer - Batch (Small Dryer 11) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P013	Raw Pork Dryer - Batch (Small Dryer 12) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P014	Raw Pork Dryer - Batch (Small Dryer 13) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P015	Raw Pork Dryer - Batch (Small Dryer 14) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P016	Raw Pork Dryer - Batch (Small Dryer 15) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P017	Raw Pork Dryer - Batch (Small Dryer 16) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P018	Raw Pork Dryer - Batch (Small Dryer 17) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired
P019	Raw Pork Dryer - Batch (Small Dryer 18) - 240 lb/hr (dry product) - 400,000 Btu/hr natural gas, direct-fired

- 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).

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.

None.



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.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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)	0.35 lb particulate matter less than 10 microns (PM ₁₀)/hr and 1.54 tons PM ₁₀ /yr individually [See b)(2)d.] 0.13 lb organic compounds (OC)/hr and 0.58 ton OC/yr individually
b. OAC rule 3745-17-07 (A)	See b)(2)a. and b)(2)b. Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six minute average, except as provided by rule.
c. OAC rule 3745-17-11(B)	See b)(2)c.

Additional Terms and Conditions

The hourly PM₁₀ and OC emission limitations were established for PTI purposes to reflect the potentials to emit for each emissions unit. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (A).

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

All emissions of particulate matter are assumed to be PM₁₀.

c) Operational Restrictions

None.



d) Monitoring and/or Recordkeeping Requirements

The permittee shall perform weekly checks, for each emissions unit while it is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each 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:

the color of the emissions;

whether the emissions are representative of normal operations;

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

the total duration of any visible emission incident; and

any corrective actions taken to minimize or eliminate the abnormal visible emissions.

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

e) Reporting Requirements

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 PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:

- 0.35 lb PM₁₀ /hr
- 0.13 lb OC /hr

Applicable Compliance Method:

The hourly PM₁₀ and OC emissions limits were established in accordance with the results of emissions testing (October 2004) on a similar unit.



If required, the permittee shall demonstrate compliance with the hourly allowable PM₁₀ emission limitation above in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

Emission Limitation:

1.54 tons PM₁₀ /yr
0.58 tons OC /yr

Applicable Compliance Method:

As long as compliance with the hourly limitations is maintained, compliance with the annual limitations shall be assumed (the annual limitations were calculated by multiplying the hourly limitations by 8760, and then dividing by 2000).

Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

None.



4. Emissions Unit Group - Uncontrolled Super Dryers: P023, P024, P025, P026, P030, P031, P032,

EU ID	Operations, Property and/or Equipment Description
P023	Raw Pork Dryer - Batch (Super Dryer 22) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P024	Raw Pork Dryer - Batch (Super Dryer 23) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P025	Raw Pork Dryer - Batch (Super Dryer 24) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P026	Raw Pork Dryer - Batch (Super Dryer 25) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P030	Raw Pork Dryer - Batch (Super Dryer 29) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P031	Raw Pork Dryer - Batch (Super Dryer 30) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired
P032	Raw Pork Dryer - Batch (Super Dryer 31) - 722 lb/hr (dry product) - 1.8 mmBtu/hr natural gas, direct-fired

- 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).

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.

None.

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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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)	1.15 lbs particulate matter less than 10 microns (PM ₁₀) /hr, 5.04 tons PM ₁₀ /yr [See b)(2)d.]
		0.40 lb organic compounds (OC) /hr, 1.75 tons OC /yr
		See b)(2)a. and b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07 (A)	Visible PE emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

Additional Terms and Conditions

The hourly PM₁₀ and OC emission limitations were established for PTI purposes to reflect the potentials to emit for each emissions unit. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (A).

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

All emissions of particulate matter are assumed to be PM₁₀.

c) Operational Restrictions

None.

d) Monitoring and/or Recordkeeping Requirements

The permittee shall perform weekly checks, for each emissions unit while it is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each 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:

the color of the emissions;

whether the emissions are representative of normal operations;

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

the total duration of any visible emission incident; and

any corrective actions taken to minimize or eliminate the abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that



no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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 PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:

1.15 lbs PM₁₀ /hr
0.40 lb OC /hr

Applicable Compliance Method:

The hourly PM₁₀ and OC emissions limits were established in accordance with the results of emissions testing (October 2004) on a similar unit.

If required, the permittee shall demonstrate compliance with the hourly allowable PM₁₀ emission limitation above in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

If required, the permittee shall demonstrate compliance with the OC emission limitation above in accordance with 40 CFR 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

Emission Limitation:

5.04 tons PM₁₀ /yr
1.75 tons OC /yr

Applicable Compliance Method:

As long as compliance with the hourly limitations is maintained, compliance with the annual limitations shall be assumed (the annual limitations were calculated by multiplying the hourly limitations by 8760, and then dividing by 2000).

Emission Limitation:

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



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Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

None.