



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

8/7/2009

Amy Haigler
IAMS COMPANY
3700 STATE RT 65
LEIPSIC, OH 45856

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0369000037
Permit Number: P0087446
Permit Type: Renewal
County: Putnam

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
IAMS COMPANY**

Facility ID: 0369000037
Permit Number: P0087446
Permit Type: Renewal
Issued: 8/7/2009
Effective: 8/7/2009
Expiration: 8/7/2019



Air Pollution Permit-to-Install and Operate
for
IAMS COMPANY

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Final Permit-to-Install and Operate
Permit Number: P0087446
Facility ID: 0369000037
Effective Date: 8/7/2009

Authorization

Facility ID: 0369000037
Application Number(s): A0018433, A0037076
Permit Number: P0087446
Permit Description: Renewal
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/7/2009
Effective Date: 8/7/2009
Expiration Date: 8/7/2019
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15
This document constitutes issuance to:

IAMS COMPANY
3700 ST RT 65
LEIPSIC, OH 45856-0087

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: P0087446
Permit Description: Renewal

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

Emissions Unit ID: P001
Company Equipment ID: E3
Superseded Permit Number: 03-16096
General Permit Category and Type: Not Applicable

Emissions Unit ID: P901
Company Equipment ID: E1
Superseded Permit Number: 03-16096
General Permit Category and Type: Not Applicable

Emissions Unit ID: P902
Company Equipment ID: E2
Superseded Permit Number: 03-16096
General Permit Category and Type: Not Applicable

Emissions Unit ID: P903
Company Equipment ID: E20
Superseded Permit Number: 03-16096
General Permit Category and Type: Not Applicable

Group Name: GROUP 1

Emissions Unit ID:	P010
Company Equipment ID:	E14
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	E15
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	E16
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	E17
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable

Group Name: GROUP 2

Emissions Unit ID:	P020
Company Equipment ID:	E8A
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	E8B
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable



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Group Name: GROUP 3

Emissions Unit ID:	P022
Company Equipment ID:	E9A
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	E9B
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable

Group Name: GROUP 4

Emissions Unit ID:	P018
Company Equipment ID:	E6A
Superseded Permit Number:	03-16295
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	E6B
Superseded Permit Number:	03-16295
General Permit Category and Type:	Not Applicable

Group Name: GROUP 5

Emissions Unit ID:	P014
Company Equipment ID:	E18 A&B
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	E18B
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable

Group Name: GROUP 6

Emissions Unit ID:	P009
Company Equipment ID:	E12
Superseded Permit Number:	03-16295
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	E10
Superseded Permit Number:	03-16096
General Permit Category and Type:	Not Applicable



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Permit Number: P0087446

Facility ID: 0369000037

Effective Date: 8/7/2009

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 change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0087446

Facility ID: 0369000037

Effective Date: 8/7/2009

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.



State of Ohio Environmental Protection Agency
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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
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Final Permit-to-Install and Operate

Permit Number: P0087446

Facility ID: 0369000037

Effective Date: 8/7/2009

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.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



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Effective Date: 8/7/2009

C. Emissions Unit Terms and Conditions



1. P001, E3

Operations, Property and/or Equipment Description:

Ingredient Receiving Distributor with Air Return Spouts (E3)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	Particulate emissions (PE) shall not exceed 0.15 pound per hour (lb/hr) and 0.66 tons per year (tpy). Visible PE shall not exceed 0% opacity as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 grains per dry standard cubic foot (gr/dscf). The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.



BAT requirements also include compliance with the terms and conditions of this permit.

- b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
 - a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this 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:

PE shall not exceed 0.15 lb/hr and 0.66 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 1,800 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, compliance with this emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.



2. P901, E1

Operations, Property and/or Equipment Description:

Material Receiving by Railcar and Hopper Bottom Truck (E1)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	<u>stack emissions:</u> Particulate emissions (PE) shall not exceed 0.81 pounds per hour (lbs/hr) and 3.55 tons/yr (tpy). Visible PE shall not exceed 0% opacity, as a six-minute average from the baghouse stack <u>fugitive emissions:</u> PE shall not exceed 1.49 tpy. Particulate matter 10 microns in diameter or less (PM ₁₀) shall not exceed 0.22 tpy. Visible fugitive PE shall not exceed 5% opacity, as a three-minute average from grain receiving operations See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-08(B)	None [see b)(2)d.].
e.	OAC rule 3745-17-07(B)	None [see b)(2)e.].

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirements for emissions unit P901 have been determined to be the following:
 - i. use of a drive-through tunnel (building) with closed overhead door for truck/railcar unloading;
 - ii. use of appropriate sized grain receiving system to facilitate choke-feed condition for truck/railcar unloading; and
 - iii. use of an aspiration system vented to a baghouse serving the transferring and conveying of grain. The baghouse shall achieve a maximum outlet concentration of 0.01 gr/dscf.
- b. All PE is assumed to be PM₁₀.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).
- d. The Iams Company Facility 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.
- e. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

- (1) The permittee shall keep the overhead door of the drive-through tunnel (building) closed at all times while unloading grain.
- (2) The permittee shall perform all unloading operations in a manner to maintain a choke-feed condition.
- (3) The permittee shall not operate the aspiration system for the whole grain storage silos during grain unloading operations.

d) Monitoring and/or Record keeping Requirements

- (1) 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:



- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the drive-through tunnel for truck/railcar unloading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.
- (4) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(3).
 - c. The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. any corrective actions taken to eliminate the visible particulate emissions.
 - c. all days during which any visible fugitive particulate emissions were observed from the drive-through tunnel for truck/railcar unloading; and
 - d. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

f) Testing Requirements

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

- a. Emission Limitation:
0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation:
Stack PE shall not exceed 0.81 lbs/hr and 3.55 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum grain loading of 0.01 gr/dscf by the maximum volumetric air flow (9500 dscfm), using the appropriate conversion factors of 7000 grains/pound and 60 minutes/hour. Compliance shall be demonstrated by the monitoring, record keeping, and reporting requirements for the baghouse. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The permittee shall demonstrate compliance with the annual emission limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with



the annual throughput limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Fugitive PE shall not exceed 1.49 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the appropriate emission factors from AP-42 Chapter 9.9.1, Table 9.9.1-2 (3/2003) (0.017 lb PE/ton handled) by the maximum throughput (3,504,000 tons/yr*), dividing by 2000 lbs/ton and applying a 95% control efficiency for controls applied.

* The maximum annual throughput is based on the maximum production rate of 400 tons per hour.

d. Emission Limitation:

Fugitive PM10 shall not exceed 0.22 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the appropriate emission factors from AP-42 Chapter 9.9.1, Table 9.9.1-2 (3/2003) (0.0025 lb PM₁₀/ton handled) by the maximum throughput (3,504,000 tons/yr*), dividing by 2000 lbs/ton and applying a 95% control efficiency for controls applied.

* The maximum annual throughput is based on the maximum production rate of 400 tons per hour.

e. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity, as a three-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9 and the modifications indicated in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from the baghouse stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0087446
Facility ID: 0369000037
Effective Date: 8/7/2009

g) Miscellaneous Requirements

(1) None.



3. P902, E2

Operations, Property and/or Equipment Description:

Raw Material Receiving by Hopper Bottom Truck (E2)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific 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)	<u>stack emissions:</u> Particulate emissions (PE) shall not exceed 0.84 pounds per hour (lbs/hr) and 3.68 tons/yr (tpy). Visible PE shall not exceed 0% opacity, as a six-minute average from the baghouse stack <u>fugitive emissions:</u> PE shall not exceed 1.49 tpy. Particulate matter 10 microns in diameter or less (PM ₁₀) shall not exceed 0.22 tpy. Visible fugitive PE shall not exceed 5% opacity, as a three-minute average from grain receiving operations See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-08(B)	None [see b)(2)d.].
e.	OAC rule 3745-17-07(B)	None [see b)(2)e.].

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirements for emissions unit P901 have been determined to be the following:
 - i. use of a drive-through tunnel (building) with closed overhead door for truck/railcar unloading; and
 - ii. use of appropriate sized grain receiving system to facilitate choke-feed condition for truck unloading.

BAT requirements also include compliance with the terms and conditions of this permit.
- b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).
- d. The Iams Company Facility 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.
- e. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

- (1) The permittee shall keep the overhead door of the drive-through tunnel (building) closed at all times while unloading meat-meal/ingredients.
- (2) The permittee shall not operate the aspiration system for the meat-meal/ingredient storage bins while receiving new shipments of meat-meal/ingredient.
- (3) The permittee shall perform all unloading operations in a manner to maintain a choke-feed condition.

d) Monitoring and/or Record keeping Requirements

- (1) 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:



- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the drive-through tunnel for truck/railcar unloading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.
- (4) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(3).
 - c. The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. any corrective actions taken to eliminate the visible particulate emissions.
 - c. all days during which any visible fugitive particulate emissions were observed from the drive-through tunnel for truck/railcar unloading; and
 - d. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

b. Emission Limitation:

Stack PE shall not exceed 0.84 lb/hr and 3.68 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum grain loading of 0.01 gr/dscf by the maximum volumetric air flow (9800 dscfm), using the appropriate conversion factors of 7000 grains/pound and 60 minutes/hour. Compliance shall be demonstrated by the monitoring, record keeping, and reporting requirements for the baghouse. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The permittee shall demonstrate compliance with the annual emission limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with



the annual throughput limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Fugitive PE shall not exceed 1.49 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the appropriate emission factors from AP-42 Chapter 9.9.1, Table 9.9.1-2 (3/2003) (0.017 lb PE/ton handled) by the maximum throughput (3,504,000 tons/yr*), dividing by 2000 lbs/ton and applying a 95% control efficiency for using a drive-through tunnel (building) that is a three-sided enclosure.

d. Emission Limitation:

Fugitive PM10 shall not exceed 0.22 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the appropriate emission factors from AP-42 Chapter 9.9.1, Table 9.9.1-2 (3/2003) (0.0025 lb PM₁₀/ton handled) by the maximum throughput (3,504,000 tons/yr*), dividing by 2000 lbs/ton and applying a 95% control efficiency for using a drive-through tunnel (building) that is a three-sided enclosure.

e. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity, as a three-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9 and the modifications indicated in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average from the baghouse stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



4. P903, E20

Operations, Property and/or Equipment Description:

Raw Material Shipping by Hopper Bottom Truck and Railcar (E20)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	<u>stack emissions:</u> Particulate emissions (PE) shall not exceed 0.10 pound per hour (lb/hr) and 0.45 ton per yr (tpy). Visible PE shall not exceed 0% opacity, as a six-minute average from the baghouse stack <u>fugitive emissions:</u> PE shall not exceed 3.77 tpy. Particulate matter 10 microns in diameter or less (PM ₁₀) shall not exceed 1.27 tpy. Visible fugitive PE shall not exceed 5% opacity, as a three-minute average from grain/meal loading operations. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-08(B)	None [see b)(2)d.].
e.	OAC rule 3745-17-07(B)	None [see b)(2)e.].

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirements for emissions unit P903 have been determined to be the following:
 - i. use three-sided enclosure for truck/railcar loading;
 - ii. use of an aspiration system vented to a baghouse serving the transferring and conveying of grain/meal; and
 - iii. use of a telescoping chute for truck/railcar loading.
- b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3475-31-05 (A)(3).
- d. The Iams Company Facility 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.
- e. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Record keeping Requirements

- (1) 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:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:



- a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
- b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the drive-through tunnel for truck/railcar unloading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the abnormal visible emissions.

- (4) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
- b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(3).
- c. The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. any corrective actions taken to eliminate the visible particulate emissions.
- c. all days during which any visible fugitive particulate emissions were observed from the drive-through tunnel for truck/railcar unloading; and
- d. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

b. Emission Limitation:

Stack PE shall not exceed 0.10 lb/hr and 0.45 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a maximum grain loading of 0.01 gr/dscf by the maximum volumetric air flow (1,200 dscfm), using the appropriate conversion factors of 7000 grains/pound and 60 minutes/hour. Compliance shall be demonstrated by the monitoring, record keeping, and reporting requirements for the baghouse. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The permittee shall demonstrate compliance with the annual emission limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with the annual throughput limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Fugitive PE shall not exceed 3.77 tpy.



Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by using AP-42, Chapter 9.9.1, Table 9.9.1-1 (3/2003) emission factor of 0.086 lb PE/ton handled, the annual grain throughput for this emissions source and a control efficiency of 95% obtained from the use of a 3-sided control structure and the use of a telescoping spout.

d. Emission Limitation:

Fugitive PM10 shall not exceed 1.27 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the appropriate emission factors from AP-42's Chapter 9.9.1, Table 9.9.1-1 (3/2003) (0.029 lb PM₁₀/ton handled) by the maximum throughput (1,752,000 tons/yr*), dividing by 2000 lbs/ton and applying a 95% control efficiency for controls applied.

* The maximum annual throughput is based on the maximum production rate of 200 tons per hour.

e. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity, as a three-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9 and the modifications indicated in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from the baghouse stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



5. Emissions Unit Group - GROUP 1: P010, P011, P015, P016

EU ID	Operations, Property and/or Equipment Description
P010	Line 1 Extruding, Drying, Cooling, and Material Handling utilizing cyclones (E14)
P011	Line 2 Extruding, Drying, Cooling, and Material Handling utilizing cyclones (E15)
P015	Line 3 Extruding, Drying, Cooling, and Material Handling utilizing cyclones (E16)
P016	Line 4 Extruding, Drying, Cooling and Material Handling (E17)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	<p><u>From each emissions unit individually:</u></p> <p>Particulate emissions (PE) shall not exceed 0.81 pound per hour (lbs/hr) and 3.55 tons per year (tpy).</p> <p>Particulate matter 10 microns in diameter or less (PM₁₀) shall not exceed 0.41 lb/hr and 1.80 tpy.</p> <p>Carbon monoxide (CO) emissions shall not exceed 2.24 lbs/hr and 9.81 tpy.</p> <p>Nitrogen oxide (NO_x) emissions shall not exceed 1.41 lbs/hr and 6.18 tpy.</p> <p>Organic compound (OC) emissions shall not exceed 2.46 lbs/hr and 10.77 tpy.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Visible PE shall not exceed 5% opacity as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirements for these emissions unit has been determined to be the use of three cyclones that control emissions from the dryer and the cooler. The emissions from these emissions unit shall be vented to the cyclones at all times the emissions unit is in operation.

BAT requirements also include compliance with the terms and conditions of this permit.
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Record keeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the cyclones is between 3 to 7 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclones when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the cyclones 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).

Whenever the monitored value for the pressure drop deviates from the limit or range 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:

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

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

This range or limit on the pressure drop across the cyclones 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 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'.

- (3) 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 the fuel burned in this emissions unit.
- (4) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the amount of material produced, in tons, through this emissions unit;
 - b. the annual, year to date material produced, in tons (sum of 'a' for each calendar month to date from January to December).

e) Reporting Requirements

- (1) 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.

- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the cyclones during the 12-month reporting period for these emissions units:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the cyclone(s) was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the cyclone(s);
 - c. each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(2)a. above 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
 - e. each incident of deviation described in e)(2)a. above 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.

f) Testing Requirements

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

- a. Emissions Limitation:

PE shall not exceed 0.81 lb/hr and 3.55 tpy.

- Applicable Compliance Method:

PE from each emissions unit is generated from an extruded air lift system and a dryer which are exhausted through a common stack. PE from the extruded air lift is controlled by a cyclone and PE from the dryer will be controlled by cyclones. The combined emissions will be 0.81 lb PE/hr and compliance shall be determined in accordance with the following:

The combined flow rate from the air lift system and the dryer is 6,400 dscf/min + 40,500 dscf/min = 46,900 dscf/min. The outlet concentration was developed based on a stack test of this emission unit on March 1, 2000.

$$PE = 46,900 \text{ dscf/min} \times 2.02^{-03} \text{ gr/dscf} \times 60 \text{ min/hr} \times 1 \text{ lb/7000 gr} = 0.81 \text{ lb/hr}$$

If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.



The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

b. Emissions Limitation:

PM10 shall not exceed 0.41 lb/hr and 1.80 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the hourly PE rate by a factor of 0.5 [stated in the footnote of AP-42's Table 9.9.1-2 for Animal Feed Mill Pellet Coolers (03/2003)]. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in Method 201 or 201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emissions Limitation:

CO shall not exceed 2.24 lbs/hr and 9.81 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a manufacturer's emission factor of 0.160 pounds CO per MMBtu with the maximum heat input capacity of 14 MMBtu per hour. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

d. Emissions Limitation:

NOx shall not exceed 1.41 lbs/hr and 6.18 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a manufacturer's emission factor of 0.101 pounds NO_x per MMBtu with the maximum heat input capacity of 14 MMBtu per hour. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4 and 7.



The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. Emissions Limitation:

OC shall not exceed 2.46 lbs/hr and 10.77 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying an emission factor derived from the stack testing of 0.154 pounds of OC per ton of product with the maximum product capacity of 16 tons per hour. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4, 18, 25 or 25A as applicable.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

f. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed 5 percent opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the test methods and procedures specified in US EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



6. Emissions Unit Group - GROUP 2: P020, P021,

EU ID	Operations, Property and/or Equipment Description
P020	Filter Receivers above ground Grain Distributor (E8A)
P021	Filter Receivers above ground Grain Distributor (E8B)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	From each emissions unit individually: Particulate emissions (PE) shall not exceed 0.11 pound per hour (lb/hr) and 0.48 tons per year (tpy). Visible PE shall not exceed 0% opacity as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 grains per dry standard cubic foot (gr/dscf). The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.



BAT requirements also include compliance with the terms and conditions of this permit.

- b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
- b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this 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:

PE shall not exceed 0.11 lb/hr and 0.48 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 1,250 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, compliance with this emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
 - c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.
- g) Miscellaneous Requirements
- (1) None.



7. Emissions Unit Group - GROUP 3: P022, P023,

EU ID	Operations, Property and/or Equipment Description
P022	Filter Receiver above ground Rice Distributor (E9A)
P023	Filter Receiver above ground Rice Distributor (E9B)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	From each emissions unit individually: Particulate emissions (PE) shall not exceed 0.62 pound per hour (lb/hr) and 2.72 tons per year (tpy). Visible PE shall not exceed 0% opacity as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 grains per dry standard cubic foot (gr/dscf). The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.



BAT requirements also include compliance with the terms and conditions of this permit.

- b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
 - a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this 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:

PE shall not exceed 0.62 lb/hr and 2.72 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 7,275 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, compliance with this emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.



8. Emissions Unit Group - GROUP 4: P018, P019,

EU ID	Operations, Property and/or Equipment Description
P018	Hammermill grinder and separation plenum (Company ID is E6A)
P019	Hammermill grinder and separation plenum (Company ID is E6B)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	From each emissions unit individually: Particulate emissions (PE) shall not exceed 0.54 pound per hour (lb/hr) and 2.37 tons per year (tpy). Visible PE shall not exceed 0% opacity as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 grains per dry standard cubic foot (gr/dscf). The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.



BAT requirements also include compliance with the terms and conditions of this permit.

- b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
 - a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this 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:

PE shall not exceed 0.54 lb/hr and 2.37 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 6,240 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, compliance with this emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.



9. Emissions Unit Group - GROUP 5: P014, P026,

EU ID	Operations, Property and/or Equipment Description
P014	Product Bin Storage with Aeration System (E18A)
P026	Product bin storage with an aeration system (Company ID for this emissions unit is E18B)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	From each emissions unit individually: Particulate emissions (PE) shall not exceed 0.74 pound per hour (lb/hr) and 3.24 tons per year (tpy). Visible PE shall not exceed 0% opacity as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements also include compliance with the terms and conditions of this permit.

b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀).



- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) 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:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
 - (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
 - a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.
- e) Reporting Requirements
 - (1) 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
 - (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
PE shall not exceed 0.74 lb/hr and 3.24 tpy.



Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation based upon a company supplied outlet emission concentration of 0.008 gr/dscf (derived from a stack test of a similar source) by a maximum volumetric air flow rate of 10,800 acfm, 60 minutes/hour, and 1 pound/7000 grains from all sixteen product storage bins. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

Visible PE shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

- (1) None.



10. Emissions Unit Group - GROUP 5: P009, P024,

EU ID	Operations, Property and/or Equipment Description
P009	Ration hammermill grinder and separation plenum (Company ID is E12)
P024	Hammermill Grinder and Separation Plenum (E10)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific 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)	<p><u>From each emissions unit individually:</u> Particulate emissions (PE) shall not exceed 0.39 pound per hour (lb/hr) and 1.71 tons per year (tpy).</p> <p>Visible PE shall not exceed 0% opacity as a six-minute average.</p> <p>See b)(2)a. and b)(2)b.</p>
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

- (2) Additional Terms and Conditions
 - a. The "Best Available Technology" (BAT) requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 grains per dry standard cubic foot (gr/dscf). The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.



BAT requirements also include compliance with the terms and conditions of this permit.

- b. All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) Notwithstanding the frequency of reporting requirements specified in e)(2), the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:
 - a. For one full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to daily readings if any abnormal visible emissions are observed.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this 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:

PE shall not exceed 0.39 lb/hr and 1.71 tpy.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 10,611 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, compliance with this emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.