



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08812

DATE: 3/23/2004

ConAgra Foods Inc
Fred Cooper
57 Miramonte Drive
Moraga, CA 94556

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 3/23/2004
Effective Date: 3/23/2004**

FINAL PERMIT TO INSTALL 01-08812

Application Number: 01-08812
APS Premise Number: 0125040756
Permit Fee: **\$7250**
Name of Facility: ConAgra Foods Inc
Person to Contact: Fred Cooper
Address: 57 Miramonte Drive
Moraga, CA 94556

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4200 Sullivant Avenue
Columbus, Ohio**

Description of proposed emissions unit(s):
Grain handling grain cleaning grain milling and flour shipping.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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ConAgra Foods Inc
PTI Application: 01-08812
Issued: 3/23/2004

Facility ID: 0125040756

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	39.1

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - grain screenings, grinding and animal feed operations controlled by baghouses no. 101 and 102	OAC rule 3745-31-05(A)	Combined particulate emissions (PE) from both baghouse stacks shall not exceed 2.45 lbs/hr and 10.7 tons/yr.
		Each baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.
		The visible emissions from each baghouse stack shall not exceed 10 % opacity, as a 3-minute average.
		See A.2.a below
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

2. Additional Terms and Conditions

- 2.a** The permittee shall capture 100% of all particulate emissions generated by grain screenings, grinding and animal feed operations and vent the emissions to baghouse no. 101 or 102.
- 2.b** The PE hourly and annual emission limitations are based on the emission unit's potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

None

C. 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 baghouse(s) 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:
- whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1 c.ii.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation:
The visible emissions from each baghouse stack shall not exceed 10 % opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

Emissions Unit ID: P006

- b. Emission Limitation:
Each baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable emission rate for PE through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:
Combined PE from both baghouse stacks shall not exceed 2.45 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the maximum emission rate from each baghouse. The maximum emission rate of 0.02 gr/dscf from baghouse no.101 is multiplied by 13,113 dscf/min by 60 min/hr and by 0.0001429 lb/gr. The maximum emission rate of 0.02 gr/dscf from baghouse no.102 is multiplied by 1113 dscf/min by 60 min/hr and by 0.0001429 lb/gr.

- d. Emission Limitation:
Combined PE from both baghouse stacks shall not exceed 10.7 tons/yr.

Applicable Compliance Method:

The maximum annual emission rate shall be determined by multiplying the maximum annual throughput of 52,500 tons/yr (PTI application, 12/08/03) by the emission factor of 0.4 lb/ton (based upon grain loading and PTI application, 12/08/03) and dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P007 - grain milling controlled by baghouses no. 4 and 103	OAC rule 3745-31-05(A)	Combined particulate emissions (PE) from both baghouse stacks shall not exceed 4.63 lbs/hr and 20.2 tons/yr.
		Each baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.
		The visible emissions from each baghouse stack shall not exceed 10 % opacity, as a 3-minute average.
		See A.2.a below
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

2. Additional Terms and Conditions

- 2.a The permittee shall capture 100% of all particulate emissions generated by grain milling and vent the emissions to baghouse no. 4 or 103.
- 2.b The PE hourly and annual emission limitations are based on the emission unit's potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

None

C. 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 baghouse(s) 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. whether the emissions are representative of normal operations;
 - b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1 c.ii.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

ConAgra Foods Inc
PTI Application: 01-00010
Issued

Facility ID: 0125040756

Emissions Unit ID: **P007**

- a. Emission Limitation:
The visible emissions from each baghouse stack shall not exceed 10 % opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:
Each baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable emission rate for PE through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:
Combined PE from both baghouse stacks shall not exceed 4.63 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the maximum emission rate from each baghouse. The maximum emission rate of 0.02 gr/dscf from baghouse no.4 is multiplied by 15,627 dscf/min by 60 min/hr and by 0.0001429 lb/gr. The maximum emission rate of 0.02 gr/dscf from baghouse no.103 is multiplied by 11,384 dscf/min by 60 min/hr and by 0.0001429 lb/gr.

- d. Emission Limitation:
Combined PE from both baghouse stacks shall not exceed 20.2 tons/yr.

Applicable Compliance Method:

The maximum annual emission rate shall be determined by multiplying the maximum annual throughput of 210,000 tons/yr (PTI application, 12/08/03) by the emission factor of 0.1929 lb/ton (based upon grain loading and PTI application, 12/08/03) and dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P008 - flour packaging controlled by baghouse no. 104	OAC rule 3745-31-05(A)	<p>Particulate emissions (PE) shall not exceed 1.45 lbs/hr and 4.7 tons/yr at the baghouse stack.</p> <p>The baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.</p> <p>The visible emissions from the baghouse stack shall not exceed 10 % opacity, as a 3-minute average.</p>
	OAC rule 3745-17-07(A)	<p>See A.2.a and B.2 below</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p>
	OAC rule 3745-17-11(B)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p>

2. Additional Terms and Conditions

- 2.a The permittee shall capture 100% of all particulate emissions generated by flour packaging and vent the emissions to baghouse no. 104.
- 2.b The PE hourly emission limitation is based on the emission unit's potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment are necessary to ensure compliance with this emission limitation.

B. Operational Restrictions

- 1. The permittee shall not package greater than 157,500 tons of flour per year.

C. 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 baghouse(s) 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. whether the emissions are representative of normal operations;
 - b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
- 2. The permittee shall maintain records of the following information:
 - a. the monthly amount of flour packaged, in tons; and
 - b. the annual emission rate, in tons, determined by multiplying the annual amount of flour packaged, in tons, by the emission factor of 0.06 lbs of PE/ton of flour and dividing by 2000 lbs/ton.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

The deviation reports shall be submitted in accordance with the reporting requirements specified

in Part I - General Term and Condition A.1 c.ii.

2. The permittee shall submit annual reports which specify the total amount of flour packaged and the emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation:

The visible emissions from the baghouse stack shall not exceed 10 % opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

The baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable emission rate for PE through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:

PE shall not exceed 1.45 lbs/hr at the baghouse stack.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum emission rate of 0.02 gr/dscf from baghouse no.104 by 8479 dscf/min by 60 min/hr and by 0.0001429 lb/gr.

- d. Emission Limitation:

PE shall not exceed 4.7 tons/yr at the baghouse stack.

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PTI A

Issued: 3/23/2004

Emissions Unit ID: **P008**

Applicable Compliance Method:
See section Part II.C.2 above.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P009 - bulk four storage and handling controlled by baghouse no. 105	OAC rule 3745-31-05(A)	<p>Particulate emissions (PE) shall not exceed 1.95 lbs/hr and 2.4 tons/yr at the baghouse stack.</p> <p>The baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.</p> <p>The visible emissions from the baghouse stack shall not exceed 10 % opacity, as a 3-minute average.</p>
	OAC rule 3745-17-07(A)	<p>See A.2.a and B.2 below</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p>
	OAC rule 3745-17-11(B)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p>

2. Additional Terms and Conditions

Emissions Unit ID: P009

- 2.a The permittee shall capture 100% of all particulate emissions generated by bulk flour storage and handling and vent the emissions to baghouse no. 105.
- 2.b The PE hourly emission limitations are based on the emission unit's potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

1. The permittee shall not handle or store greater than 157,500 tons of flour per year.

C. 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 baghouse(s) 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. whether the emissions are representative of normal operations;
 - b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain records of the following information:
 - a. the monthly amount of flour handled and stored, in tons; and
 - b. the annual emission rate, in tons, determined by multiplying the annual amount of flour handled and stored, in tons, by the emission factor of 0.03 lbs of PE/ton of flour and dividing by 2000 lbs/ton.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1 c.ii.

2. The permittee shall submit annual reports which specify the total amount of grain handled and stored, and the emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:
The visible emissions from the baghouse stack shall not exceed 10 % opacity, as a 3-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:
The baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the allowable emission rate for PE through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - c. Emission Limitation:
PE shall not exceed 1.95 lbs/hr at the baghouse stack.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the maximum emission rate of 0.02 gr/dscf from baghouse no.105 by 11,384 dscf/min by 60 min/hr and by 0.0001429 lb/gr.
 - d. Emission Limitation:
PE shall not exceed 2.4 tons/yr at the baghouse stack.

ConAgra Foods Inc
PTI Application: 01 00010
Issued

Facility ID: 0125040756

Emissions Unit ID: **P009**

Applicable Compliance Method:
See section Part II.C.2 above.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 - flour loadout to truck controlled by baghouse no. 104	OAC rule 3745-31-05(A)	Particulate emissions (PE) shall not exceed 1.45 lbs/hr and 1.6 tons/yr at the baghouse stack. The baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stacks. The visible emissions from the baghouse stack shall not exceed 10 % opacity, as a 3-minute average.
	OAC rule 3745-17-07(A)	See A.2.a and B.2 below The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

2. Additional Terms and Conditions

- 2.a The permittee shall capture 100% of all particulate emissions generated by flour loadout to truck and vent the emissions to baghouse no. 104.
- 2.b The PE hourly emission limitations are based on the emission unit's potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

- 1. The permittee shall not load greater than 157,500 tons of flour per year to trucks.

C. 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 baghouse(s) 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. whether the emissions are representative of normal operations;
 - b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
- 2. The permittee shall maintain records of the following information:
 - a. the monthly amount of flour loaded to trucks, in tons; and
 - b. the annual emission rate, in tons, determined by multiplying the annual amount of flour loaded to trucks, in tons, by the emission factor of 0.02 lbs of PE/ton of flour and dividing by 2000 lbs/ton.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

The deviation reports shall be submitted in accordance with the reporting requirements specified

in Part I - General Term and Condition A.1 c.ii.

2. The permittee shall submit annual reports which specify the total amount of flour loaded to trucks and the emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:
The visible emissions from the baghouse stack shall not exceed 10 % opacity, as a 3-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:
The baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stacks.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the allowable emission rate for PE through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - c. Emission Limitation:
PE shall not exceed 1.45 lbs/hr at the baghouse stack.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the maximum emission rate of 0.02 gr/dscf from baghouse no.104 by 8479 dscf/min by 60 min/hr and by 0.0001429 lb/gr.
 - d. Emission Limitation:
PE shall not exceed 1.6 tons/yr at the baghouse stack.

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Issued: 3/23/2004

Emissions Unit ID: **P011**

Applicable Compliance Method:
See section Part II.C.2 above.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - flour loadout to railcars controlled by sock filters	OAC rule 3745-31-05(A)	<p>Particulate emissions (PE) shall not exceed 0.031 lb/hr and 0.04 ton/yr from the sock filters.</p> <p>Each sock filter shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases.</p> <p>The visible emissions from each sock filter shall not exceed 10 % opacity, as a 3-minute average.</p> <p>See A.2.a and B.2 below</p>
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

2. Additional Terms and Conditions

- 2.a The permittee shall capture 100% of all particulate emissions generated by flour loadout

to railcars and vent the emissions to one of the sock filters.

- 2.b** The PE hourly emission limitations are based on the emission unit's potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

1. The permittee shall not load greater than 157,500 tons of flour per year to rail cars.

C. 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 sock filters 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. whether the emissions are representative of normal operations;
 - b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain records of the following information:
 - a. the monthly amount of flour loaded to railcars, in tons; and
 - b. the annual emission rate, in tons, determined by multiplying the annual amount of flour loaded to railcars, in tons, by the emission factor of 0.049 lb PE/ton of flour (AP-42,9.9.7-1, 01/95) and dividing by 2000 lbs/ton.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that (a) identify all days during which any visible particulate emissions were observed from the sock filter(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1c.ii.

2. The permittee shall submit annual reports which specify the total amount of flour loaded to rail cars and the emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:
Visible emissions shall not exceed 10% opacity, as a 3-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:
Each sock filter shall achieve an outlet emission rate of not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the allowable emission rate for PE through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - c. Emission Limitation:
PE shall not exceed 0.031 lb/hr from the sock filters.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the maximum loading rate of 63 tons/hr by the emission factor of 0.049 lbs PE/ton (AP-42, 9.9.7-1, 01/95) and by the control efficiency of the sock filters (1.0-0.99) (PTI application, 12/08/03).
 - d. Emission Limitation:
PE shall not exceed 0.04 ton/yr from the sock filters.

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Emissions Unit ID: **P012**

Applicable Compliance Method:
See section Part II.C.2 above.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - cleaning of flour rail cars controlled by baghouse No. 3	OAC rule 3745-31-05(A)	<p>Particulate emissions (PE) shall not exceed 0.20 lb/hr and 0.004 ton/yr from the baghouse stack.</p> <p>The baghouse shall emit not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases at the baghouse stack.</p> <p>The visible emissions shall not exceed 10 % opacity, as a 3-minute average from the baghouse stack.</p>
	OAC rule 3745-17-07(A)	<p>See A.2.a and B.2 below</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p>
	OAC rule 3745-17-11(B)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).</p>
	OAC rule 3745-17-08(B)	<p>The emission limitation specified by this rule</p>

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

2. Additional Terms and Conditions

- 2.a The permittee shall capture 100% of all particulate emissions generated by cleaning of flour rail cars and vent the emissions to baghouse no. 3.
- 2.b The PE hourly emission limitations are based on the emission unit's potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

- 1. The permittee shall not clean greater than 80 tons of flour per year from railcars.

C. 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 baghouse(s) 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. whether the emissions are representative of normal operations;
 - b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
- 2. The permittee shall maintain records of the following information:
 - a. the monthly amount of flour cleaned from rail cars, in tons; and
 - b. the annual emission rate, in tons, determined by multiplying the annual amount of flour cleaned from railcars, in tons, by the emission factor of 0.10 lbs of PE/ton of flour and dividing by 2000 lbs/ton.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

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The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1c.ii.

2. The permittee shall submit annual reports which specify the total amount of flour cleaned from railcars and the emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:
The visible emissions shall not exceed 10 % opacity, as a 3-minute average from the baghouse stack.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:
The baghouse shall achieve an outlet emission rate of not greater than 0.020 grain of particulate per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the allowable emission rate for PE through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - c. Emission Limitation:
PE shall not exceed 0.20 lb/hr from the baghouse stack.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the maximum emission rate of 0.02 gr/dscf from baghouse no.3 by 1153 dscf/min by 60 min/hr and by 0.0001429 lb/gr.
 - d. Emission Limitation:
PE shall not exceed 0.004 ton/yr from the baghouse stack.

Applicable Compliance Method:

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See section Part II.C.2 above.

F. Miscellaneous Requirements

None