



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.ohio.gov

MAILING ADDRESS:

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

1/29/2010

Paul Jagdeo
RALSTON FOODS
276 BREMEN ROAD
LANCASTER, OH 43130

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0123010180
Permit Number: P0104575
Permit Type: Administrative Modification
County: Fairfield

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:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Lancaster Eagle Gazette. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.ohio.gov/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,


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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-CDO; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The applicant, Ralston Foods, is a manufacturer of cooked cereals. The facility is located at the following address:

276 Bremen Road
Lancaster, Ohio 43130

Ralston Foods has submitted a permit to install (PTI) application for the proposed Administrative Modification of the following permits:

PTI 01-5616 (B015), as issued on March 1, 1995;
PTI 01-5617 (B016), as issued on March 1, 1995;
PTI 01-5689 (B017), as issued on April 5, 1995;
PTI 01-5690 (P011), as issued on April 5, 1995;
PTI 01-1726 (P012), as issued on January 11, 1988;
PTI 01-01283 (P016), as issued on July 7, 2005.

3. Facility Emissions and Attainment Status:

Ralston Foods is classified as a Major Stationary Source pursuant to Title V operating permit requirements for volatile organic compound (VOC). Potential emissions solely from the use of VOC-containing liquid flavor cereal additives exceed the Title V operating permit threshold levels. Potential emissions, without the requested synthetic minor restrictions, are 119.2 tons of VOC per year. With the requested synthetic minor restrictions the emissions of volatile organic compounds from emissions units B015, B016, B017, P011, P012, and P016 is limited to 60.0 tons of per year.

Ralston Foods is located in Fairfield County which is currently attainment for all criteria air pollutants excluding PM2.5.

4. Source Emissions:

Yearly potential emissions of volatile organic compounds from the use of VOC-containing liquid flavor cereal additives in emissions units is B015, B016, B017, P011, P012, and P016 is 119.2 tons of per year.

Limiting the maximum yearly VOC-containing liquid flavor cereal additives rate to 600,000 pounds per year will reduce volatile organic compound potential emissions of 119.2 tons per year by 59.2 tons per year. Therefore, potential emissions of 119.2 tons per year are reduced to 60 tons ($119.2 - 59.2 = 60.0$).



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104575
Facility ID: 0123010180

Emissions of volatile organic compounds is based upon the annual VOC-containing liquid flavor cereal additives rate of 600,000 pound per year multiplied by VOC content of each flavoring used (20%) multiplied by one ton per 2000 pounds.

$$(600,000 \text{ lbs VOC containing flavorings/year}) \times (.20 \% \text{ VOC content of flavorings}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 60.0 \text{ Tons VOC / Year.}$$

5. Conclusion:

Ralston Foods will become a synthetic minor facility by means of limiting the maximum yearly VOC-containing liquid flavor cereal additives rate to 600,000 pounds per year, as based upon a rolling, 12-month summation of the production rates.

The volatile organic compound emissions of 119.2 tons per year are reduced to 60.0 tons per year through this permit.

The synthetic minor will effectively restrict volatile organic compound emissions below the Title V thresholds. The operational restrictions, record keeping, reporting will ensure that compliance with this permit is achieved and maintained.

In addition to the 60 ton VOC per year synthetic minor restrictions from emissions units B015, B016, B017, P011, P012, and P016, the facility will be installing a new dryer (B018) under permit (P0105110). Potential emissions from B018 will be permitted at 23.1 tons VOC per year. Therefore, the facility wide emissions of VOC, from cereal food dryers, will be 83.1 tons VOC per year (60 + 23.1 = 83.1).

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	60.0

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
RALSTON FOODS

Issue Date: 1/29/2010
Permit Number: P0104575
Permit Type: Administrative Modification
Permit Description: Administrative modification to voluntarily limit annual VOC emissions from cereal production.
Facility ID: 0123010180
Facility Location: RALSTON FOODS
276 BREMEN RD,
LANCASTER, OH 43130
Facility Description: Breakfast Cereal Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Olen Ackman at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

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

Facility ID: 0123010180
Permit Number: P0104575
Permit Type: Administrative Modification
Issued: 1/29/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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

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Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104575

Facility ID: 0123010180

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0123010180

Application Number(s): A0037054

Permit Number: P0104575

Permit Description: Administrative modification to voluntarily limit annual VOC emissions from cereal production.

Permit Type: Administrative Modification

Permit Fee: \$6,000.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 1/29/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

RALSTON FOODS
276 BREMEN RD
LANCASTER, OH 43130

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0104575
 Permit Description: Administrative modification to voluntarily limit annual VOC emissions from cereal production.

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

Group Name: Cereal Dryers

Emissions Unit ID:	B015
Company Equipment ID:	System 4 Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B016
Company Equipment ID:	System 5 Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B017
Company Equipment ID:	System 1 Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	System 6 Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	Frosted Cereal Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	System 3 Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104575

Facility ID: 0123010180

Effective Date: To be entered upon final issuance

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, Central 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

Draft Permit-to-Install and Operate

Permit Number: P0104575

Facility ID: 0123010180

Effective Date: To be entered upon final issuance

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
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104575

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104575

Facility ID: 0123010180

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104575

Facility ID: 0123010180

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Cereal Dryers: B015, B016, B017, P011, P012, P016,

EU ID	Operations, Property and/or Equipment Description
B015	System 4 Dryer
B016	System 5 Dryer
B017	System 1 Dryer
P011	System 6 Dryer
P012	Frosted Cereal Dryer
P016	System 3 Dryer

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

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

a. None.

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

a. b(1)b. and b(2)a.

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)	Emissions shall not exceed: <u>Emissions Unit B015</u> 5.3 lbs/hr and 23.2 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives. <u>Emissions Unit B016</u> 1.0 lb/hr and 4.4 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives. <u>Emissions Unit B017</u> 1.5 lbs/hr and 6.6 tons per year of volatile organic compounds (VOC) from VOC-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>containing liquid flavor cereal additives.</p> <p><u>Emissions Unit P011</u> 1.0 lb/hr and 4.4 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.</p> <p><u>Emissions Unit P012</u> 13.7 lbs/hr and 60.0 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.</p> <p><u>Emissions Unit P016</u> 4.8 lbs/hr and 21.0 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See Section b.2.b below.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	<p>VOC emissions from liquid flavor cereal additives in emissions units B015, B016, B017, P011, P012, and P016, combined, shall not exceed, as a rolling 12-month summation, 60.0 tons per year.</p> <p>See b(2)a. below.</p>
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stacks serving these emissions units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	<p>PE from the stack serving this emission unit shall not exceed:</p> <p><u>Emissions Unit B015</u> 6.1 lbs/hr based on the Table I which is more stringent than the allowable PE rate from Figure II.</p> <p><u>Emissions Unit B016</u> 5.8 lbs/hr based on the Table I which is more stringent than the allowable PE rate from Figure II.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>Emissions Unit B017</u></p> <p>7.6 lbs/hr based on the Table I which is more stringent than the allowable PE rate from Figure II.</p> <p><u>Emissions Unit P011</u></p> <p>5.8 lbs/hr based on the Table I which is more stringent than the allowable PE rate from Figure II.</p> <p><u>Emissions Unit P012</u></p> <p>7.6 lbs/hr based on the Table I which is more stringent than the allowable PE rate from Figure II.</p> <p><u>Emissions Unit P016</u></p> <p>5.7 lbs/hr based on the Table I which is more stringent than the allowable PE rate from Figure II.</p>

(2) Additional Terms and Conditions

- a. The maximum annual VOC-containing liquid flavor cereal additives rate for the emissions units B015, B016, B017, P011, P012, and P016 shall not exceed 600,000 pounds per year, based upon a rolling, 12-month summation of the additive rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the additive rates specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Liquid Flavor Cereal Additive (pounds/year)</u>
1	155,000
1-2	312,000
1-3	390,000
1-4	468,000
1-5	507,000
1-6	546,000
1-7	585,000
1-8	600,000
1-9	600,000



1-10	600,000
1-11	600,000
1-12	600,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual additive rates limitation shall be based upon a rolling, 12-month summation of the additive rates.

- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE) from this air contaminant source since the uncontrolled potential to emit for the criteria pollutant is less than ten tons per year.
- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (2) The permittee shall collect and record the following information each day for each of the emissions units B015, B016, B017, P011, P012, and P016:
 - a. the name and identification number of each liquid flavor cereal additive applied;
 - b. the volume, in gallons, of each liquid flavor cereal additive applied;
 - c. the hours of operation of each emissions unit;
 - d. the VOC content for each flavoring material in pounds of VOC per gallon of liquid flavor cereal additive, excluding water, as applied;
 - e. the total volume, in gallons, of all of the liquid flavor cereal additive applied; and
 - f. total daily emissions, for each emissions unit, in pounds per day (c x d x e).
 - (3) The permittee shall collect and record the following information each month for the emissions units B015, B016, B017, P011, P012, and P016:
 - a. the name and identification of each liquid flavor cereal additive, as applied;
 - b. the VOC content for each flavoring material in pounds of VOC per gallon of liquid flavor cereal additive, excluding water, as applied;
 - c. the number of gallons applied, of each liquid flavor cereal additive, excluding water, as applied;
 - d. the total VOC emissions rate for all liquid flavor cereal additive, in pounds per month (b x c);



- e. for the first 12 calendar months following the initial startup of each emissions unit, the cumulative additive rate is calculated by adding the current month's additive rate to the additive rate for the preceding months since the startup of each emissions unit;

The total VOC emissions rate for all liquid flavor cereal additive, in pounds per cumulative, 12-month summation (b x d); and

- f. beginning after the first 12 calendar months following the startup of each emissions unit, the rolling, 12 month summation of the total additive rate is calculated by adding the current month's additive rate to the additive rate for the preceding eleven calendar months;

The total VOC emissions rate for all liquid flavor cereal additive, in pounds per cumulative, 12-month summation (b x d); and

- g. the total VOC emissions rate for all liquid flavor cereal additive, in tons per rolling, 12-month summation (f x 1 ton / 2000 pounds).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. VOC emissions from liquid flavor cereal additives in emissions units B015, B016, B017, P011, P012, and P016, combined, shall not exceed, as a rolling 12-month summation, 60.0 tons per year.
- ii. The maximum annual VOC-containing liquid flavor cereal additives rate for this emissions unit shall not exceed 600,000 pounds per year, based upon a rolling, 12-month summation of the additive rates.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).



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

f) Testing Requirements

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

a. Emission Limitation

i. Emissions Unit B015

5.3 lbs/hr and 23.2 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.

Applicable Compliance Method

Compliance with the short term limitation of 5.3 lbs/hr shall be demonstrated by multiplying maximum hourly liquid cereal flavor usage of 7.21 pounds of per hour by the maximum VOC content of the liquid cereal flavoring of 73.0 %.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25, or 25A.

Compliance with the long term limitation of 23.2 tons per year shall be demonstrated by multiplying the short term limitation of 5.3 pounds of OC per hour by 8,760 hours per year and dividing by 2,000 pounds per ton.

ii. Emissions Unit B016

1.0 lb/hr and 4.4 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.

Applicable Compliance Method

Compliance with the short term limitation of 1.0 lbs/hr shall be demonstrated by multiplying maximum hourly liquid cereal flavor usage of 18.4 pounds of per hour by the maximum VOC content of the liquid cereal flavoring of 5.35 %.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25, or 25A.

Compliance with the long term limitation of 4.4 tons per year shall be demonstrated by multiplying the short term limitation of 1.0 pound of OC per hour by 8,760 hours per year and dividing by 2,000 pounds per ton.



iii. Emissions Unit B017

1.5 lbs/hr and 6.6 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.

Applicable Compliance Method

Compliance with the short term limitation of 1.5 lbs/hr shall be demonstrated by multiplying maximum hourly liquid cereal flavor usage of 27.6 pounds of per hour by the maximum VOC content of the liquid cereal flavoring of 5.35 %.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25, or 25A.

Compliance with the long term limitation of 6.6 tons per year shall be demonstrated by multiplying the short term limitation of 1.5 pounds of OC per hour by 8,760 hours per year and dividing by 2,000 pounds per ton.

iv. Emissions Unit P011

1.0 lb/hr and 4.4 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.

Applicable Compliance Method

Compliance with the short term limitation of 1.0 lb/hr shall be demonstrated by multiplying maximum hourly liquid cereal flavor usage of 18.4 pounds of per hour by the maximum VOC content of the liquid cereal flavoring of 5.35 %.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25, or 25A.

Compliance with the long term limitation of 4.4 tons per year shall be demonstrated by multiplying the short term limitation of 1.0 pound of OC per hour by 8,760 hours per year and dividing by 2,000 pounds per ton.

v. Emissions Unit P012

13.7 lbs/hr and 60.0 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.

Applicable Compliance Method

Compliance with the short term limitation of 13.7 lbs/hr shall be demonstrated by multiplying maximum hourly liquid cereal flavor usage of 74.6 pounds of per hour by the maximum VOC content of the liquid cereal flavoring of 18.4 %.



If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25, or 25

Compliance with the long term limitation of 60.0 tons per year shall be demonstrated by multiplying the short term limitation of 13.7 pound of OC per hour by 8,760 hours per year and dividing by 2,000 pounds per ton.

vi. Emissions Unit P016

4.8 lbs/hr and 21.0 tons per year of volatile organic compounds (VOC) from VOC-containing liquid flavor cereal additives.

Applicable Compliance Method

Compliance with the short term limitation of 4.8 lbs/hr shall be demonstrated by multiplying maximum hourly liquid cereal flavor usage of 6.5 pounds of per hour by the maximum VOC content of the liquid cereal flavoring of 73.0 %.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25, or 25A.

Compliance with the long term limitation of 21.0 tons per year shall be demonstrated by multiplying the short term limitation of 4.8 pounds of OC per hour by 8,760 hours per year and dividing by 2,000 pounds per ton.

b. Emission Limitation

VOC emissions from liquid flavor cereal additives in emissions units B015, B016, B017, P011, P012, and P016, combined, shall not exceed, as a rolling 12-month summation, 60.0 tons per year.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d(3) of this permit.

Emissions of volatile organic compounds is based upon the annual VOC-containing liquid flavor cereal additives rate of 600,000 pound per year multiplied by VOC content of each flavoring used (20%) multiplied by one ton per 2000 pounds.

$(600,000 \text{ lbs VOC containing flavorings/year}) \times (.20 \% \text{ VOC content of flavorings in lbs/gallon}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 60.0 \text{ Tons VOC} / \text{Year}$.

c. Emission Limitation

Visible particulate emissions from the stacks serving these emissions units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.



Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation

PE from the stack serving this emission unit shall not exceed:

i. Emissions Unit B015

6.1 lbs/hr

Applicable Compliance Method

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.

$$P = 1.80 \text{ tons/hr}$$

$$E = 6.1 \text{ lbs/hr}$$

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

ii. Emissions Unit B016

5.8 lbs/hr

Applicable Compliance Method

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.

$$P = 1.67 \text{ tons/hr}$$

$$E = 5.8 \text{ lbs/hr}$$

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



iii. Emissions Unit B017

7.6 lbs/hr

Applicable Compliance Method

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.

$$P = 2.52 \text{ tons/hr}$$

$$E = 7.6 \text{ lbs/hr}$$

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

iv. Emissions Unit P011

5.8 lbs/hr

Applicable Compliance Method

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.

$$P = 1.67 \text{ tons/hr}$$

$$E = 5.8 \text{ lbs/hr}$$

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

v. Emissions Unit P012

7.6 lbs/hr

Applicable Compliance Method

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:



$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.

$$P = 2.53 \text{ tons/hr}$$

$$E = 7.6 \text{ lbs/hr}$$

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

vi. Emissions Unit P016

$$5.7 \text{ lbs/hr}$$

Applicable Compliance Method

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.

$$P = 1.63 \text{ tons/hr}$$

$$E = 5.7 \text{ lbs/hr}$$

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

g) Miscellaneous Requirements

- (1) None.