



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

2/16/2010

Certified Mail

Ted Slavik  
General Mills Operations, Inc.  
704 West Washington St.  
Chicago, IL 60185

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1431400175  
Permit Number: P0105832  
Permit Type: OAC Chapter 3745-31 Modification  
County: Hamilton

No	TOXIC REVIEW
No	PSD
Yes	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 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 public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov> 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 Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660

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 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 is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA  
HCD OES; Indiana; Kentucky

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



PUBLIC NOTICE  
Issuance Of Draft Air Pollution Permit-To-Install  
General Mills Operations, Inc.

Issue Date: 2/16/2010  
Permit Number: P0105832  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Chapter 31 Modification to emissions units P002, P029, P034 and P901.  
Facility ID: 1431400175  
Facility Location: General Mills Operations, Inc.  
11301 Mosteller Road,  
Cincinnati, OH 45241  
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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Mike Kramer at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

General Mills is a Title V located in Hamilton County, Ohio which is located in a non-attainment area for ozone and particulate matter 2.5 microns and less in diameter (PM2.5). This permit-to-install and operate (PTIO) permitting action is a chapter 31 modification to increase allowable particulate emissions for the following emissions: a dark cereal production line (P002), a light cereal production line (P029), a finished product conveyance system (P034), and a by-product transfer and loadout area (P901). This modification was initiated by the permittee to increase the fan ratings (increase the net air flow of the current baghouses) and to update emission factors. There is no increase in production as a result of this modification.

3. Facility Emissions and Attainment Status:

Facility wide emissions are as follows: particulate emissions/particulate matter 10 microns and less in diameter (PE/PM10) are 47.16 tons per year (TPY); sulfur dioxide (SO<sub>2</sub>) are 40.54 TPY; nitrogen oxide (NO<sub>x</sub>) are 37.79 TPY; carbon monoxide (CO) are 37.98 TPY; and organic compounds (OC) are 4.71 TPY.

Hamilton County, Ohio is currently designated as a non-attainment area for ozone and particulate matter 2.5 microns and less in diameter (PM2.5), but attainment for the rest of the criteria pollutants.

4. Source Emissions:

Emissions from air contaminant sources (emissions units) P002, P029, and P034 were derived using confidential data submitted with PTIO #P0105832. Emissions from emissions unit P901 were derived from using U.S. EPA document for emission factors, AP-42, Table 9.9.1-1, version March, 2003.

Mass emission limitations are expressed in grains per dry standard cubic feet and are dependent upon the equipment number and respective air flows of that equipment.

Annual mass proposed allowable emission limitations are the following: emissions unit P002, 16.59 TPY of PE/PM10/PM2.5; emissions unit P029, 16.53 TPY of PE/PM10/PM2.5; emissions unit P034, 4.35 TPY of PE/PM10/PM2.5; emissions unit P0901, 3.24 TPY of PE/PM10/PM2.5.

PE along with some PM10 and PM2.5 (some PM10 and PM2.5 will not be due to their size, that is, small diameter) will be controlled by dust collectors. The dust collector associated with emissions unit P901 is considered an integral piece of equipment.

5. Conclusion:

The federally enforceable terms and conditions of this PTIO will assure that General Mills Operations, Inc.'s facility remains in compliance with the applicable emission limitations set forth in this PTIO. This PTIO



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Permit Strategy Write-Up**  
**Permit Number:** P0105832  
**Facility ID:** 1431400175

includes operational restrictions, record keeping and reporting requirements, reporting requirements and emission compliance demonstration requirements which will allow the facility to determine compliance with the synthetic minor limitations for emissions units P002, P029, P034, and P901.

6. Please provide additional notes or comments as necessary:

Note due to concerns about the state of Ohio’s best available technology (BAT) regulations being federally enforceable, the potential to emit calculation was based upon the state of Ohio’s Ohio Administrative Code (OAC) particulate emission regulation 3745-17-11 which would generate tons per year amounts significantly over the proposed allowable listed below (PE of 40.75 and PM10 of 40.73) and therefore would be a considered a major modification at a current Title V and major nonattainment for PM2.5 facility. So to reduce those tons per year amounts (PE of 40.75 and PM10 of 40.73) to those listed below (PE of 1.49 and PM10 of 1.46), Ohio EPA is issuing this synthetic minor permitting action to secure federally enforceable terms and conditions to demonstrate that this permitting action would not be a major modification at a current major stationary source for purposes on non attainment review for PM2.5.

It is also important to point out that even though the total permit allowable emission summary has tons per year values over significant emission threshold levels that in actually the only net emission tons per year increase from the previously issued permit are those listed below under the following heading: “Total increase from the previous allowable emissions listed in air PTI 14-06161 due to increase air flow of baghouse which triggered this modification”. Those tons per year increases are below PM2.5 significant emission levels of 10 tons per year and therefore demonstrates that is permitting action would not trigger a major modification at a current major stationary source for purposes on non attainment review for PM2.5.

Be advised that due to current issues associated with appropriate particulate filterable compliance methods concerning both PM10 and PM2.5 pollutants, Ohio EPA is using U.S. EPA, Method 5, as the appropriate compliance method for both of those pollutants.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	40.75
PM10	40.73

Total increase from the previous allowable emissions listed in air PTI 14-06161 due to increase air flow of baghouse which triggered this modification (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.49
PM10	1.46



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

**DRAFT**

**Air Pollution Permit-to-Install  
for  
General Mills Operations, Inc.**

Facility ID: 1431400175  
Permit Number: P0105832  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 2/16/2010  
Effective: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 General Mills Operations, Inc.

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**Draft Permit-to-Install**

**Permit Number:** P0105832

**Facility ID:** 1431400175

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1431400175  
Facility Description: Manufacturer of breakfast cereals and snack foods.  
Application Number(s): A0038014  
Permit Number: P0105832  
Permit Description: Chapter 31 Modification to emissions units P002, P029, P034 and P901.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$675.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 2/16/2010  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

General Mills Operations, Inc.  
11301 Mosteller Road  
Cincinnati, OH 45241

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

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

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0105832

Permit Description: Chapter 31 Modification to emissions units P002, P029, P034 and P901.

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

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Dark Cereal Production Line
Superseded Permit Number:	14-05120
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P029</b>
Company Equipment ID:	Light Cereal Production Line
Superseded Permit Number:	14-04952
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P034</b>
Company Equipment ID:	Finished Product Conveyance/Packaging System
Superseded Permit Number:	14-05280
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	By-Product Transfer and Loadout
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**

**Permit Number:** P0105832

**Facility ID:** 1431400175

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

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



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.



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

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

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

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

## 5. **Scheduled Maintenance/Malfunction Reporting**

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

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

## 6. **Compliance Requirements**

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

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

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



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Hamilton County Dept. of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**7. Best Available Technology**

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

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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



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

## **10. Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



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

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

## **12. Permit-To-Operate Application**

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

## **13. Construction Compliance Certification**

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

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

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

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

## **16. Fees**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0105832

**Facility ID:** 1431400175

**Effective Date:** To be entered upon final issuance

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Hamilton County Dept. of Environmental Services must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

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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**

**Permit Number:** P0105832

**Facility ID:** 1431400175

**Effective Date:** To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0105832

**Facility ID:** 1431400175

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P002, Dark Cereal Production Line**

**Operations, Property and/or Equipment Description:**

Dark Cereal Production Line

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from pre-dryer infeed and equipment numbers 671, 7091, 477 and 488.</p> <p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.006 grain per dry standard cubic foot from equipment numbers 591, 596, and 2647.</p> <p>The PE/PM10/PM2.5 emission limitations established in PTIO P0105832 were based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A).</p> <p>See b)(2)a.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 16.59 tons per year.  See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Compliance with the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with:

Emission limitation of 0.010 gr/dscf PE/PM10/PM2.5 from pre-dryer infeed and equipment numbers 671, 7091, 477 and 488; and

Emission limitation of 0.006 gr/dscf PE/PM10/PM2.5 from equipment numbers 591, 596, and 2647.

- b. Particulate emissions from the pre-dryer infeed shall be captured and vented to a dust collector, or an equivalent control device capable of complying with the PE/PM10/PM2.5 emission limitations established in PTIO #P0105832.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;



- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse(s) is 0.1 to 10.0 inches of water.



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

(3) The permittee shall maintain monthly PE, PM10, and PM2.5 emission records.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(2) The permittee shall submit annual deviation (excursion) reports that identify the following:

Any time the annual limitation of 16.59 tons of PM/PM10/PM2.5 per year is exceeded.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(3) The permittee shall submit semiannual written reports that identify:

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



These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

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

a. Emission Limitation:

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from the pre-dryer infeed and equipment numbers 671, 7091, 477 and 488.

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.006 grain per dry standard cubic foot from equipment numbers 591, 596, and 2647.

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 16.59 tons per year.

Applicable Compliance Method:

The PE/PM10/PM2.5 short term and annual emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTIO #P0105832.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulate emissions (PE), particulate matter ten microns and less in diameter (PM10), and/or particulate matter 2.5 microns and less in diameter (PM2.5) in the appropriate averaging period(s).

ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 5 40 CFR Part 60, Appendix A

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

iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.



- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- v. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vi. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

b. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



**2. P029, Light Cereal Production Line**

**Operations, Property and/or Equipment Description:**

Light Cereal Production Line

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from the pre-dryer infeed process, the rice regrind receiver and equipment numbers 9356, 9360, 9456, 9460, 9568 and 9589.</p> <p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.004 grain per dry standard cubic foot from equipment number 934.</p> <p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.007 grain per dry standard cubic foot from equipment number 9298.</p> <p>The PE/PM10/PM2.5 emission limitations established in PTIO P0105832 were based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, or reporting</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>requirements are necessary to demonstrate compliance with these emission limitations.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A).</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 16.53 tons per year.</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-17-07(A)(1)	<p>Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.</p>
d.	OAC rule 3745-17-11(B)(1)	<p>The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

(2) Additional Terms and Conditions

- a. Compliance with the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with:

Emission limitation of 0.010 gr/dscf PE/PM10/PM2.5 from the pre-dryer infeed process, the rice regrind receiver and equipment numbers 9356, 9360, 9456, 9460, 9568 and 9589.

Emission limitation of 0.004 gr/dscf PE/PM10/PM2.5 from equipment number 934.

Emission limitation of 0.007 gr/dscf PE/PM10/PM2.5 from equipment number 9298.

- b. Particulate emissions from the pre-dryer infeed and jetzone cooler shall be captured and vented to a dust collector, or an equivalent control device capable of complying with the PE/PM10/PM2.5 emission limitations established in PTIO #P0105832.

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse(s) is 0.1 to 10.0 inches of water.

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

The permittee shall maintain monthly PE, PM10, and PM2.5 emission records.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (2) The permittee shall submit annual deviation (excursion) reports that identify the following:



Any time the annual limitation of 16.53 tons PM/PM10/PM2.5 per year is exceeded.

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

- (3) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from the pre-dryer infeed process, the rice regrind receiver and equipment numbers 9356, 9360, 9456, 9460, 9568 and 9589.

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.004 grain per dry standard cubic foot from equipment number 934.

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.007 grain per dry standard cubic foot from equipment number 9298.

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 16.53 tons per year.

Applicable Compliance Method:

The PE/PM10/PM2.5 short term and annual emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTIO #P0105832.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:



i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulate emissions (PE) and/or particulate matter ten microns and less in diameter (PM10), in the appropriate averaging period(s).

ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 5      40 CFR Part 60, Appendix A

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

iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0105832

**Facility ID:** 1431400175

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



**3. P034, Finished Product Conveyance/Packaging System**

**Operations, Property and/or Equipment Description:**

Third Floor Roll Lines Building 5

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)	<p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from equipment numbers 7259 and 7521.</p> <p>The PE/PM10/PM2.5 emission limitations established in PTIO P0105832 were based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A).</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 4.35 tons per year.</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Permit to Install P0105832 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

Emission limitation of 0.010 gr/dscf PE/PM10/PM2.5 from equipment numbers 7259 and 7521.

Use of a dust collector, or an equivalent control device capable of complying with the PE/PM10/PM2.5 emission limitations established in PTIO #P0105832.

- b. Particulate emissions from the equipment comprising this emissions unit shall be captured and vented to a dust collector or an equivalent control device capable of complying with the PE/PM10/PM2.5 emission limitations established in PTIO #P0105832.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission



incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse(s) is 0.1 to 10.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of



this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall maintain monthly PE, PM10, and PM2.5 emission records.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (2) The permittee shall submit annual deviation (excursion) reports that identify the following:

Any time the annual limitation of 4.35 tons PM/PM10/PM2.5 per year is exceeded.

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

- (3) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):



a. Emission Limitation:

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from equipment numbers 7259 and 7521.

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 4.35 tons per year.

Applicable Compliance Method:

The PE/PM10/PM2.5 emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTIO #P0105832.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulate emissions (PE) and/or particulate matter ten microns and less in diameter (PM10), in the appropriate averaging period(s).

ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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

iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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



valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



**4. P901, By-Product Transfer and Loadout**

**Operations, Property and/or Equipment Description:**

By-Product Transfer and Loadout

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)	<p>Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from equipment numbers 2093, 7802, 7194, 7292, 7297, 2317 and 2314.</p> <p>Fugitive Particulate Emissions (PE) shall not exceed 0.04 ton per year.</p> <p>Fugitive emissions of Particulate Matter 10 microns less in diameter (PM10) shall not exceed 0.02 ton per year.</p> <p>The PE/PM10 emission limitations established in PTIO P0105832 were based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-07(A) and 3745-17-07(B).</p> <p>See b)(2)a.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) from the stack shall not exceed 3.24 tons per year.  See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Permit to Install P0105832 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

Emission limitation of 0.010 gr/dscf PE/PM10/PM2.5 from equipment numbers 2093, 7802, 7194, 7292, 7297, 2317 and 2314.

Use of a dust collector, or an equivalent control device capable of complying with the PE/PM10/PM2.5 emission limitations established in PTIO #P0105832.

- b. Particulate emissions from the equipment comprising this emissions unit shall be captured and vented to a dust collector or an equivalent control device capable of complying with the PE/PM10 emission limitations established in PTIO #P0105832.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building



windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (3) The permittee shall maintain monthly stack PE, PM10, and PM2.5 emission records.

e) Reporting Requirements

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

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and



- b. any corrective actions taken to minimize or eliminate the or visible fugitive particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit annual deviation (excursion) reports that identify the following:

Any time the annual limitation of 3.24 tons PM/PM10/PM2.5 per year is exceeded.

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

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.010 grain per dry standard cubic foot from equipment numbers 2093, 7802, 7194, 7292, 7297, 2317 and 2314.

Particulate Emissions (PE), emissions of Particulate Matter 10 microns or less in diameter (PM10) and emissions of Particulate Matter 2.5 microns or less in diameter (PM2.5) from the stack shall not exceed 3.24 tons per year.

Applicable Compliance Method:

The PE/PM10/PM2.5 emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTIO #P0105832.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulate emissions (PE) and/or particulate matter ten microns and less in diameter (PM10), in the appropriate averaging period(s).
- ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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



- iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- v. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

b. Emission Limitation:

Fugitive Particulate Emissions (PE) shall not exceed 0.04 ton per year.

Fugitive emissions of Particulate Matter 10 microns less in diameter (PM10) shall not exceed 0.02 ton per year.

Applicable Compliance Method:

The fugitive PE/PM10 emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in the application for PTIO #P0105832.

c. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible particulate emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0105832

**Facility ID:** 1431400175

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.