



Environmental  
Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

4/13/2010

Gary Sluss  
Pierre Foods, Inc.  
9990 Princeton-Glendale Rd.  
Cincinnati, OH 45246

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1409000687  
Permit Number: 14-06026  
Permit Type: OAC Chapter 3745-31 Modification  
County: Butler

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) 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, Journal News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. 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 Region 5 *Via E-Mail Notification*  
HCDOES; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Pierre Foods has requested a Chapter 31 modification for 10 cook lines: emissions units P001 (Cook Line 1 – Fry/Fry), P002 (Cook Line 2 – Sear/Steam Oven), P003 (Cook Line 3 – Sear/Impinge Oven), P004 (Cook Line 4 – Fry/Impinge), P005 (Cook Line 5 – Fry Line), P006 (Cook Line 6 – Sear/Impinge), P007 (Cook Line 7 – Sear/Impinge), P008 (Cook Line 8 – Sear/Impinge), P009 (Cook Line 9 – Sear/Impinge), and P010 (Cook Line 10 – Sear/Impinge). This facility is a meat product cooking and packaging facility. The facility is requesting federally enforceable restrictions to avoid Title V applicability.
3. Facility Emissions and Attainment Status: The facility is located in Butler County which is currently non-attainment for the 8-hour ozone standard (VOC and NO<sub>x</sub>), non-attainment for particulate matter 2.5 microns and less in diameter (PM<sub>2.5</sub>), and attainment for all other criteria pollutants. This permit will institute federally enforceable emission limitations which restrict the PE and VOC emissions to less than 100 tons/year.
4. Source Emissions: The potential PE and VOC emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010 are greater than 100 tons/year. This permit will limit the PE from P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, along with any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units at the facility, combined, to 82.0 tons/year. This permit will limit the VOC emissions from P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, along with any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units at the facility, combined, to 96.3 tons/year.
5. Conclusion: The permittee has proposed to comply with the federally enforceable emission limitations of 82.0 tons/year of PE and 96.3 tons/year of VOC as 12-month rolling summations; has proposed associated operational and emissions record keeping and reporting to demonstrate compliance with these limitations; and, will accept the terms and conditions of this permit which will limit emissions of PE and VOC as synthetic minor so that emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, along with any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units at the facility, will not trigger either new source review installation and Title V permitting requirements. The facility will maintain records and be subject to reporting as outlined in the permit to ensure compliance with the voluntary synthetic minor emission limitations.
6. Please provide additional notes or comments as necessary:

None



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Permit Strategy Write-Up**  
**Permit Number:** 14-06026  
**Facility ID:** 1409000687

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	82.0
VOC	96.3
NOx	19.9
CO	16.7

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
Pierre Foods, Inc.

Issue Date: 4/13/2010  
Permit Number: 14-06026  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Modification application to apply emissions factors determined with emissions testing.  
Permit will be a Synthetic Minor permit.  
Facility ID: 1409000687  
Facility Location: Pierre Foods, Inc.  
9990 Princeton-Glendale Rd.,  
West Chester Twp., OH 45246  
Facility Description: Rendering and Meat Byproduct Processing

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 Paul Tedtman 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.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Pierre Foods, Inc.**

Facility ID: 1409000687  
Permit Number: 14-06026  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 4/13/2010  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
Pierre Foods, Inc.

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## Authorization

Facility ID: 1409000687

Application Number(s): A0010056, A0039021

Permit Number: 14-06026

Permit Description: Modification application to apply emissions factors determined with emissions testing.  
Permit will be a Synthetic Minor permit.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$13,500.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 4/13/2010

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:

Pierre Foods, Inc.  
9990 Princeton-Glendale Rd.  
West Chester Twp., OH 45246

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:

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 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: 14-06026  
Permit Description: Modification application to apply emissions factors determined with emissions testing. Permit will be a Synthetic Minor permit.

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

- Emissions Unit ID: P001**  
Company Equipment ID: Line 1 - Fry/Fry  
Superseded Permit Number: P0063087  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P002**  
Company Equipment ID: Line 2 - Sear/Steam Oven  
Superseded Permit Number: P0063088  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P003**  
Company Equipment ID: Line 3 - Sear/Impinge Oven  
Superseded Permit Number: P0063089  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P004**  
Company Equipment ID: Line 4 - Fry/Impinge  
Superseded Permit Number: P0063090  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P005**  
Company Equipment ID: Line 5 - Fry Line  
Superseded Permit Number: P0063091  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P006**  
Company Equipment ID: Line 6 - Sear/Impinge  
Superseded Permit Number: P0063092  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P007**  
Company Equipment ID: Line 7 - Sear/Impinge  
Superseded Permit Number: P0063093  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P008**  
Company Equipment ID: Line 8 - Sear/Impinge  
Superseded Permit Number: P0063094  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P009**  
Company Equipment ID: Line 9 - Sear/Impinge  
Superseded Permit Number: 14-05341  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P010**  
Company Equipment ID: Line 10 - Sear/Impinge  
Superseded Permit Number: 14-05341  
General Permit Category and Type: Not Applicable

## **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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Hamilton County Dept. of Environmental Services 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<sup>1</sup> 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 emissions 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.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

## **B. Facility-Wide Terms and Conditions**

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) OAC rule 3745-31-05(D) shall apply to the following emissions units: P001 (Cook Line 1 – Fry/Fry), P002 (Cook Line 2 - Sear/Steam Oven), P003 (Cook Line 3 - Sear/Impinge Oven), P004 (Cook Line 4 - Fry/Impinge), P005 (Cook Line 5 - Fry Line), P006 (Cook Line 6 - Sear/Impinge), P007 (Cook Line 7 - Sear/Impinge), P008 (Cook Line 8 - Sear/Impinge), P009 (Cook Line 9 - Sear/Impinge), and P010 (Cook Line 10 - Sear/Impinge) ), along with any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units at the facility as this permit is a Synthetic Minor to avoid Title V permitting.
    - (2) The actual particulate emissions (PE) (filterable and condensable) and particulate matter with a diameter 10 microns and less (PM10) (filterable and condensable) stack emissions from emissions units B001 (Boiler #1), B002 (Boiler #2), B003 (Boiler #3), B004 (Boiler #4), B005 (Boiler #5), B006 (Boiler Number 6 - 12.56 MMBtu/hr gas fired boiler), B007 (Boiler #7), B008 (Boiler #8), P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 82.0 tons per year (TPY) for PE, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.
    - (3) The actual emissions of volatile organic compounds (VOC) from emissions units B001, B002, B003, B004, B005, B006, B007, B008, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 96.3 tons per year (TPY) for VOC, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.
    - (4) The maximum annual production rate for all cooked products in emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, combined, shall not exceed 96,500 tons per year, based on a rolling, 12-month summation of the production rates. This total production rate for all cooked products includes a maximum production rate for Angus beef production of 35,700 tons per year, a maximum production rate for

All Beef production of 19,000 tons per year, and a maximum production rate for Fried production of 7,800 tons per year. The permittee has the option of substituting All Beef production, at an exchange of 1.5 tons of All Beef production to 1 ton of Angus beef production, or substituting Fried production, at an exchange of 1.3 tons of Fried production to 1 ton of Angus beef production, for the Angus beef production total limitation of 35,700 tons per rolling, 12-month period. The permittee has the option of substituting Fried production, at an exchange of 0.5 ton of Fried production to 1 ton of All Beef production, for the All Beef production. The production rates for individual products mentioned above shall be based on a rolling, 12-month summation of the individual product production rates.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- (5) The permittee shall collect and record the following information each month for emissions units P001 through P010, combined:
- a. The identification of each cooked product produced;
  - b. The number of tons of each cooked product produced;
  - c. The total number of tons of all cooked products produced;
  - d. The number of additional pounds or tons of All Beef production or Fried production, produced beyond their individual production limitations, to be substituted for Angus beef production;
  - e. The number of additional pounds or tons of Fried production, produced beyond the specified Fried production limitation, to be substituted for All Beef production;
  - f. The amount of the Angus beef production limitation that has been used, by any combination of Angus beef, All Beef, or Fried production;
  - g. The amount of the All Beef production limitation that has been used, by any combination of All Beef or Fried production;
  - h. The PE emission factor, in pounds of PE emissions per ton of cooked product, of each cooked product produced;
  - i. The VOC emission factor, in pounds of VOC emissions per ton of cooked product, of each cooked product produced;
  - j. The total stack PE rate for all cooked products produced, in pounds or tons;
  - k. The total stack VOC emission rate for all cooked products produced, in pounds or tons;
  - l. The updated rolling, 12-month summation of the total cooked products production, in tons. (This shall include the information for the current month and the preceding eleven months);

- m. The updated rolling, 12-month summation of each individual cooked product production, in tons. (This shall include the information for the current month and the preceding eleven months);
  - n. The updated rolling, 12-month summation of stack PE, in tons. (This shall include the information for the current month and the preceding eleven months);
  - o. The updated rolling, 12-month summation of stack VOC emissions, in tons. (This shall include the information for the current month and the preceding eleven months);
  - p. The updated rolling, 12-month summation of the additional All Beef production or Fried production, produced beyond their individual production limitations, to be substituted for Angus beef production, in tons. (This shall include the information for the current month and the preceding eleven months);
  - q. The updated rolling, 12-month summation of the amount of the Angus beef production limitation that has been used, in tons. (This shall include the information for the current month and the preceding eleven months);
  - r. The updated rolling, 12-month summation of the additional Fried production, produced beyond the specified Fried production limitation, to be substituted for All Beef production, in tons. (This shall include the information for the current month and the preceding eleven months); and,
  - s. The updated rolling, 12-month summation of the amount of the All Beef production limitation that has been used, in tons. (This shall include the information for the current month and the preceding eleven months).
- (6) The permittee shall collect and record the following information each month for emissions units B001, B002, B003, B004, B005, B006, B007, B008, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined:
- a. The total stack PE (filterable and condensable), in tons;
  - b. The total stack VOC emissions, in tons;
  - c. The updated rolling, 12-month summation of stack PE (filterable and condensable), in tons; and
  - d. The updated rolling, 12-month summation of stack VOC emissions, in tons.
- (7) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations 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:  
  
all exceedances of the rolling, 12-month emission limitation for stack PE;

all exceedances of the rolling, 12-month emission limitation for stack VOC;

all exceedances of the rolling, 12-month restriction on the total cooked products production; and,

all exceedances of the rolling, 12-month restriction on each individual cooked product production.

- 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).

- (8) Compliance with the emission limitations in b)(2) and b)(3) of these terms and conditions shall be demonstrated by the following methods:

- a. Emission Limitation:

The combined annual stack PE (filterable and condensable) and PM10 from emissions units B001, B002, B003, B004, B005, B006, B007, B008, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 82.0 tons per year (TPY), based on a rolling, 12-month summation.

Applicable compliance method:

Compliance with the rolling, 12-month PE and PM10 stack emissions limitation in b)(2) shall be determined by the record keeping in b)(5) and b)(6).

Actual stack PE for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010 shall be determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

PE = Sum of [(tons of individual cooked product) x (EF) X (1 - CE) / (2000 lbs/ton)] for each cooked product and for each emissions unit, where:

EF = the stack emissions factor for PE (filterable and condensable) for the corresponding cooked product; EF for Angus product = 4.99 lbs of PE/ton of cooked product, EF for All Beef product = 3.32 lbs of PE/ton of cooked product, EF for Pork product = 1.95 lbs of PE/ton of cooked product, EF for Chicken product = 0.53 lb of PE/ton of cooked product, and EF for Fried product = 0.12 lb of PE/ton of cooked product.

CE = the control efficiency of the control equipment for PE for the corresponding control equipment; CE for rotoclones for emissions units P001 - P006 = 30%, and CE for wet scrubbers for emissions units P007 - P010 = 80%.

Stack PE for emissions units B001, B002, B003, B004, B005, B006, B007, and B008, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units shall be determined based on applying the appropriate AP-42 emissions factor for the process.

b. Emission Limitation:

The combined annual VOC stack emissions from emissions units B001, B002, B003, B004, B005, B006, B007, B008, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 96.3 tons per year (TPY), based on a rolling, 12-month summation.

Applicable compliance method:

Compliance with the rolling, 12-month VOC stack emissions limitation in b)(3) shall be determined by the record keeping in b)(5) and b)(6).

Actual VOC emissions for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010 shall be determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

VOC emissions = Sum of [(tons of individual cooked product) x (EF) X (1 - CE) / (2000 lbs/ton)] for each cooked product and for each emissions unit, where:

EF = the emission factor for stack VOC emissions for the corresponding cooked product; EF for Angus product = 3.88 lbs of VOC/ton of cooked product, EF for All Beef product = 1.45 lbs of VOC/ton of cooked product, EF for Pork product = 0.95 lb of VOC/ton of cooked product, EF for Chicken product = 0.26 lb of VOC/ton of cooked product, and EF for Fried product = 2.87 lbs of VOC/ton of cooked product.

CE = the control efficiency of the control equipment for PE for the corresponding control equipment; CE for rotoclones for emissions units P001 - P006 = 20%, and CE for wet scrubbers for emissions units P007 - P010 = 20%.

Stack VOC emissions for emissions units B001, B002, B003, B004, B005, B006, B007, and B008, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units shall be determined based on applying the appropriate AP-42 emissions factor for the process.

- (9) Compliance with the rolling, 12-month production rate limitations in b)(4) shall be determined by the record keeping in b)(5).

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



1. P001, Line 1 – Fry/Fry

Operations, Property and/or Equipment Description:

Cook Line 1 – Fry/Fry

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)d.

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.	ORC 3704.03(T)	Volatile organic compound (VOC) stack emissions shall not exceed 19.9 tons of emission per rolling, 12-month period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	<p>Particulate emissions (PE) (filterable and condensable) shall not exceed 0.21 pound per hour.</p> <p>Particulate matter with a diameter 10 microns and less (PM10) stack emissions (filterable and condensable) shall not exceed 0.15 pound per hour.</p> <p>Volatile organic compound (VOC) stack emissions shall not exceed 5.7 pounds per hour.</p> <p>See b)(2)a., b)(2)c., b)(2)e., b)(2)d., and c)(1).</p> <p>The requirements of this rule also include</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		compliance with the requirements of OAC rule 3745-31-05(D) OAC rule 3745-17-07(A), and OAC rule 3745-17-07(B).
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
f.	OAC rule 3745-17-11(B)	Particulate stack emissions (PE) from this emissions unit shall not exceed 6.90 lb/hr.
g.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) from this air contaminant source since the uncontrolled potential to emit for both PE and PM10 is less than 10.0 TPY.

- c. Compliance with OAC rule 3745-31-05(A)(3), as effective on 11/30/2001 for VOC shall be demonstrated by the production limitations, emission limitations, and the use of a rotoclone.
  - d. The hourly emission limitations for PE, PM10, and VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
  - e. The rotoclone on this emissions unit shall have a control efficiency of at least 20% for VOC.
- c) Operational Restrictions
- (1) This emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- 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 emissions of 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 shall collect and record the following information each month for emissions unit P001:
    - a. The identification of each cooked product produced;

- b. The number of tons of each cooked product produced;
  - c. The VOC emission factor, in pounds of VOC emissions per ton of cooked product, of each cooked product produced;
  - d. The total stack VOC emission rate for all cooked products produced, in pounds or tons;
  - e. The updated rolling, 12-month summation of the total cooked products production, in tons. (This shall include the information for the current month and the preceding eleven months); and
  - f. The updated rolling, 12-month summation of stack VOC emissions, in tons. (This shall include the information for the current month and the preceding eleven months).
- e) Reporting Requirements
- (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
    - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
  - (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 b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
    - a. Emission Limitation:  
  
Volatile organic compound (VOC) stack emissions shall not exceed 19.9 tons of emission per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC stack emission limitation in b)(1)a. shall be determined by the record keeping in d)(2).

Potential VOC stack emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

VOC emissions = (17,300 TPY cooked fried product maximum allowable production) x (2.87 lbs of VOC/ton of cooked product) x (1 - 20% control efficiency for VOC) / (2000 lbs/ton) = 19.9 tons.

b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

Applicable Compliance Method:

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

d. Emission Limitation:

The uncontrolled potential to emit for PE and PM10 from this emissions unit is less than ten tons per year.

Particulate emissions (PE) (filterable and condensable) shall not exceed 0.21 pound per hour.

Particulate matter with a diameter 10 microns and less (PM10) stack emissions (filterable and condensable) shall not exceed 0.15 pound per hour.

Applicable Compliance Method:

The potential annual stack PE rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual stack PE rate for emissions unit P001 was determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$PE = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PE/ton of cooked product}) \times (7300 \text{ hours per year maximum}) \times (1 - 30\% \text{ control efficiency for PE}) / (2000 \text{ lbs/ton}) = 0.77 \text{ ton per year of PE.}$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack PE were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$PE = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PE/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) = 0.21 \text{ pound per hour.}$$

The potential annual PM10 rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual PM10 rate for emissions unit P001 was determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$PM10 = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PE/ton fried cooked product}) \times (7300 \text{ hours per year maximum}) / (2000 \text{ lbs/ton}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) = 0.54 \text{ ton per year of PM10.}$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack PM10 emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$PM10 \text{ emissions} = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PE/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) = 0.15 \text{ pound per hour.}$$

e. Emission Limitation:

The stack particulate emissions (PE) from this emissions unit shall not exceed 6.90 lb/hr.



Applicable Compliance Method:

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



2. P002, Line 2 - Sear/Steam Oven

Operations, Property and/or Equipment Description:

Cook Line 2 - Sear/Steam Oven

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)d.

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), as effective 11/30/2001	<p>Volatile organic compound (VOC) emissions shall not exceed 1.33 pounds per hour.</p> <p>Particulate emissions (PE) (filterable and condensable) shall not exceed 2.66 pounds per hour.</p> <p>Particulate matter with a diameter 10 microns and less (PM10) stack emissions (filterable and condensable) shall not exceed 1.86 pounds per hour.</p> <p>Emissions of nitrogen oxides (NOx) shall not exceed 0.17 pound per hour and 0.75 TPY.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.14 pound per hour and 0.63 TPY.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) for VOC and PM10 only, OAC rule 3745-17-07(A), and OAC rule 3745-17-07(B).
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
c.	OAC rule 3745-31-05(E), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 4.62 pounds per hour.
g.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compound (VOC), oxides of nitrogen

(NO<sub>x</sub>), or carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for VOC, NO<sub>x</sub>, and CO is less than 10.0 TPY.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Federally enforceable permit to install and operate 14-06026 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):

- i. for particulate emissions (PE): the emissions from this emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- ii. for particulate matter emissions 10 microns and less in diameter (PM<sub>10</sub>): the emissions from this emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- iii. The rotoclone on this emissions unit shall have a control efficiency of at least 30% for PE.

- d. The hourly emission limitations for VOC, PE, and PM<sub>10</sub> are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

- e. The hourly and annual emission limitations for NO<sub>x</sub> and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- (2) The permittee shall produce no Angus beef product in this emissions unit.

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 emissions of 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.

e) Reporting Requirements

- (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (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 b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
  - a. Emission Limitation:  
  
Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

**Applicable Compliance Method:**

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

**b. Emission Limitation:**

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

**Applicable Compliance Method:**

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

**c. Emission Limitation:**

The uncontrolled potential to emit for VOC emissions from this emissions unit is less than ten tons per year.

Volatile organic compound (VOC) emissions shall not exceed 1.33 pounds per hour.

**Applicable Compliance Method:**

The potential annual stack VOC emissions rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual stack VOC emissions rate for emissions unit P002 was determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

VOC stack emissions = (2287 lbs of cooked product/hr)/(2000 lbs/ton) x (1.45 lbs of stack VOC/ton of cooked product) x (7300 hours per year maximum)/(2000 lbs/ton) = 6.05 tons per year of VOC.

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{VOC stack emissions} = (2287 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (1.45 \text{ lbs of stack VOC/ton of cooked product}) \times (1 - 20\% \text{ control efficiency for VOC}) = 1.33 \text{ pounds per hour.}$$

d. Emission Limitation:

The controlled potential to emit for both stack PE and PM10 emissions from this emissions unit is less than ten tons per year.

Particulate emissions (PE) (filterable and condensable) shall not exceed 2.66 pounds per hour.

Particulate matter with a diameter 10 microns and less (PM10) stack emissions (filterable and condensable) shall not exceed 1.86 pounds per hour.

Applicable Compliance Method:

The potential annual stack PE rate is based on this emissions unit's controlled potential to emit.

The potential annual stack PE rate for emissions unit P002 was determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{PE} = (2287 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs of stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (7300 \text{ hours per year maximum}) / (2000 \text{ lbs/ton}) = 9.70 \text{ tons per year of PE.}$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack PE rate was determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{PE} = (2287 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs of stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) = 2.66 \text{ pounds per hour.}$$

The potential annual stack PM10 emissions rate is based on this emissions unit's controlled potential to emit.

The potential annual stack PM10 rate for emissions unit P002 was determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{PM10} = (2287 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) \times (7300 \text{ hours per year maximum}) / (2000 \text{ lbs/ton}) = 6.79 \text{ tons per year of PM10.}$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack PM10 emissions rate was determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{PM10} = (2287 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs of stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) = 1.86 \text{ pounds per hour.}$$

e. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 0.17 pounds per hour and 0.75 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NOx emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{NOx emissions hourly} = (1716 \text{ CF natural gas/hr}) \times (100 \text{ lbs NOx} / 1,000,000 \text{ CF natural gas AP-42, Table 1.4-1}).$$
$$\text{NOx emissions annually} = (1716 \text{ CF natural gas/hr}) \times (100 \text{ lbs NOx} / 1,000,000 \text{ CF natural gas AP-42, Table 1.4-1}) \times (8,760 \text{ hours per year}) / (2000 \text{ lbs/ton}).$$

f. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.14 pounds per hour and 0.63 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{CO emissions hourly} = (1716 \text{ CF natural gas/hr}) \times (84 \text{ lbs CO}/1,000,000 \text{ CF natural gas AP-42, Table 1.4-1}).$$
$$\text{CO emissions annually} = (1716 \text{ CF natural gas/hr}) \times (84 \text{ lbs CO} / 1,000,000 \text{ CF natural gas AP-42, Table 1.4-1}) \times (8,760 \text{ hours per year}) / (2000 \text{ lbs/ton}).$$

g. Emission Limitation:

Stack particulate emissions (PE) from this emissions unit shall not exceed 4.62 lb/hr based upon an hourly raw meat usage rate of 2391 and Table I listed in OAC rule OAC rule 3745-17-11.



Applicable Compliance Method:

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



3. P003, Line 3 - Sear/Impinge Oven

Operations, Property and/or Equipment Description:

Cook Line 3 - Sear/Impinge Oven

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)e.

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.	ORC 3704.03(T)	Stack particulate emissions (PE) (filterable and condensable) shall not exceed 12.7 tons of emission per rolling, 12-month period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	<p>Volatile organic compound (VOC) emissions shall not exceed 1.74 pounds per hour.</p> <p>Stack particulate matter emissions (PE) (filterable and condensable) shall not exceed 3.49 pounds per hour.</p> <p>Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.44 pounds per hour.</p> <p>Emissions of nitrogen oxides (NOx) shall not exceed 0.39 pound per hour and 1.67 TPY.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Carbon monoxide (CO) emissions shall not exceed 0.33 pound per hour and 1.41 TPY.  See b)(2)a., b)(2)g., c)(1), and c)(2).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) for VOC and PM10 only, OAC rule 3745-17-07(A), and OAC rule 3745-17-07(B).
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(E), as effective 12/1/2006	See b)(2)c.
e.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
g.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 6.15 pounds per hour.
h.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compound (VOC), oxides of nitrogen (NO<sub>x</sub>), or carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for VOC, NO<sub>x</sub>, and CO is less than 10.0 TPY.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Federally enforceable permit to install and operate 14-06026 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):

- i. for particulate matter emissions 10 microns and less in diameter (PM<sub>10</sub>): the emissions from this emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- ii. The rotoclone on this emissions unit shall have a control efficiency of at least 30% for PE.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitations, emission limitations, and the use of a rotoclone.
- e. The hourly emission limitations for VOC and PM<sub>10</sub> are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
- f. The hourly and annual emission limitations for NO<sub>x</sub> and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- g. The rotoclone on this emissions unit shall have a control efficiency of at least 30% for PE.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- (2) The permittee shall produce no Angus beef product in this emissions unit.

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 emissions of 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 shall collect and record the following information each month for emissions unit P003:
  - a. The identification of each cooked product produced;
  - b. The number of tons of each cooked product produced;
  - c. The PE emission factor, in pounds of PE emissions per ton of cooked product, of each cooked product produced;
  - d. The total stack PE (filterable and condensable) for all cooked products produced, in pounds or tons;
  - e. The updated rolling, 12-month summation of the total cooked products production, in tons. (This shall include the information for the current month and the preceding eleven months); and
  - f. The updated rolling, 12-month summation of stack PE (filterable and condensable), in tons. (This shall include the information for the current month and the preceding eleven months).

e) Reporting Requirements

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



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (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 b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
- a. Emission Limitation:  
  
Stack particulate emissions (PE) (filterable and condensable) shall not exceed 12.7 tons of emission per rolling, 12-month period.  
  
Stack particulate emissions (PE) (filterable and condensable) shall not exceed 3.49 pounds per hour.  
  
Applicable Compliance Method:  
  
Compliance with the rolling, 12-month PE (filterable and condensable) stack emissions limitation in b)(1)a. shall be determined by the record keeping in d)(2).  
  
Potential PE stack emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:  
  
$$PE = (3000 \text{ lbs maximum cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (7,300 \text{ maximum operating hours per year}) / (2000 \text{ lbs/ton}) = 12.7 \text{ tons of emission per rolling, 12-month period.}$$
  
  
$$\text{Stack PE emissions} = (3000 \text{ lbs cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) = 3.49 \text{ pounds per hour.}$$
  - b. Emission Limitation:  
  
The controlled potential to emit for stack PM10 emissions from this emissions unit is less than ten tons per year.

Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.44 pounds per hour.

Applicable Compliance Method:

The potential annual stack PM10 emissions rate is based on this emissions unit's controlled potential to emit.

The potential annual stack PM10 rate for emissions unit P003 was determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$\text{PM10} = (3000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) \times (7300 \text{ hours per year maximum}) / (2000 \text{ lbs/ton}) = 8.91 \text{ tons per year of PM10.}$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential stack PM10 emissions (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$\text{Stack PM10 emissions} = (3000 \text{ lbs cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) = 2.44 \text{ pounds per hour.}$$

c. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

## d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

Applicable Compliance Method:

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

## e. Emission Limitation:

The uncontrolled potential to emit for VOC emissions from this emissions unit is less than ten tons per year.

Volatile organic compound (VOC) emissions shall not exceed 1.74 pounds per hour.

Applicable Compliance Method:

The potential annual stack VOC emissions rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual stack VOC emissions rate for emissions unit P003 was determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$\text{VOC emissions} = (3000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (1.45 \text{ lbs of stack VOC/ton of cooked product}) \times (7300 \text{ hours per year maximum}) / (2000 \text{ lbs/ton}) = 7.94 \text{ tons per year of VOC.}$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$\text{VOC emissions} = (3000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (1.45 \text{ lbs of stack VOC/ton of cooked product}) \times (1 - 20\% \text{ control efficiency for VOC}).$$

## f. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 0.39 pounds per hour and 1.67 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NOx emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

NOx emissions hourly = (3824 CF natural gas/hr) x (100 lbs NOx / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NOx emissions annually = (3824 CF natural gas/hr) x (100 lbs NOx / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.33 pound per hour and 1.41 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

CO emissions hourly = (3824 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (3824 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

h. Emission Limitation:

Particulate emissions (PE) shall not exceed 6.15 pounds per hour based upon an hourly raw meat usage rate of 3660 and Table I listed in OAC rule OAC rule 3745-17-11.

Applicable Compliance Method:

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



4. P004, Line 4 - Fry/Impinge

Operations, Property and/or Equipment Description:

Cook Line 4 - Fry/Impinge

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)d.

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.	ORC 3704.03(T)	<p>Volatile organic compound (VOC) stack emissions shall not exceed 19.9 tons of emission per rolling, 12-month period.</p> <p>Stack particulate emissions (PE) (filterable and condensable) shall not exceed 21.2 tons of emission per rolling, 12-month period.</p> <p>Stack particulate matter emissions (filterable and condensable) 10 microns and less in diameter (PM10) shall not exceed 14.8 tons of emission per rolling, 12-month period.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	<p>Emissions of nitrogen oxides (NOx) shall not exceed 0.21 pound per hour and 0.92 TPY.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.18 pound per hour and 0.78</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		TPY.  See b)(2)a., b)(2)e., and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-11(B).
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1 and c)(2).
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 6.90 pounds per hour.
g.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to oxides of nitrogen (NOx) or carbon monoxide (CO)

emissions from this air contaminant source since the uncontrolled potential to emit for NO<sub>x</sub> and CO is less than 10.0 TPY.

- c. Compliance with OAC rule 3745-31-05(A)(3), as effective 11/30/2001 shall be demonstrated by the production limitations, emission limitations, and the use of a rotoclone.
- d. The hourly and annual emission limitations for NO<sub>x</sub> and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- e. The rotoclone on this emissions unit shall have a control efficiency of at least 30% for PE and a control efficiency of at least 20% for VOC.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- (2) The permittee shall produce no Angus beef product in this emissions unit.

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 emissions of 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 shall collect and record the following information each month for emissions unit P004:
- a. The identification of each cooked product produced;
  - b. The number of tons of each cooked product produced;
  - c. The PE emission factor, in pounds of PE emissions per ton of cooked product, of each cooked product produced;
  - d. The VOC emission factor, in pounds of VOC emissions per ton of cooked product, of each cooked product produced;
  - e. The total stack PE (filterable and condensable) for all cooked products produced, in pounds or tons;
  - f. The total stack PM10 (filterable and condensable) emissions for all cooked products produced, in pounds or tons;
  - g. The total stack VOC emission rate for all cooked products produced, in pounds or tons;
  - h. The updated rolling, 12-month summation of the total cooked products production, in tons. (This shall include the information for the current month and the preceding eleven months);
  - i. The updated rolling, 12-month summation of stack PE (filterable and condensable), in tons. (This shall include the information for the current month and the preceding eleven months);
  - j. The updated rolling, 12-month summation of stack PM10 (filterable and condensable) emissions, in tons. (This shall include the information for the current month and the preceding eleven months); and
  - k. The updated rolling, 12-month summation of stack VOC emissions, in tons. (This shall include the information for the current month and the preceding eleven months).
- e) Reporting Requirements
- (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

- c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (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 b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
      - a. Emission Limitation:

Stack particulate emissions (PE) (filterable and condensable) shall not exceed 21.2 tons of emission per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month PE (filterable and condensable) stack emissions limitation in b)(1)a. shall be determined by the record keeping in d)(2).

Potential PE stack emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$PE = (5000 \text{ lbs maximum cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (7,300 \text{ maximum operating hours per year}) / (2000 \text{ lbs/ton}).$$
      - b. Emission Limitation:

Stack particulate matter emissions (filterable and condensable) 10 microns and less in diameter (PM10) shall not exceed 14.8 tons of emission per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month PM10 (filterable and condensable) stack emissions limitation in b)(1)a. shall be determined by the record keeping in d)(2).

Potential PM10 stack emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

$$PM10 \text{ emissions} = (5000 \text{ lbs maximum cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs stack PE/ton cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) \times (7,300 \text{ maximum operating hours per year}) / (2000 \text{ lbs/ton}).$$

c. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

Applicable Compliance Method:

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

e. Emission Limitation:

Volatile organic compound (VOC) stack emissions shall not exceed 19.9 tons of emission per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC stack emissions limitation in b)(1)a. shall be determined by the record keeping in d)(2).

Potential VOC stack emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

VOC emissions = (17,300 TPY cooked fried product maximum allowable production) x (2.87 lbs of VOC/ton of cooked product) x (1 - 20% control efficiency for VOC) / (2000 lbs/ton).

f. Emission Limitation:

Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 0.21 pounds per hour and 0.92 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NO<sub>x</sub> emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

NO<sub>x</sub> emissions hourly = (2108 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NO<sub>x</sub> emissions annually = (2108 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.18 pounds per hour and 0.78 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application A0039021 as submitted on February 16, 2010:

CO emissions hourly = (2108 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (2108 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

h. Emission Limitation:

Particulate emissions (PE) shall not exceed 6.90 pounds per hour based upon an hourly raw meat usage rate of 4350 and Table I listed in OAC rule OAC rule 3745-17-11.

Applicable Compliance Method:

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



5. P005, Line 5 - Fry Line

Operations, Property and/or Equipment Description:

Cook Line 5 - Fry Line

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)d.

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)	Stack volatile organic compound (VOC) emissions shall not exceed 3.84 pounds per hour.  See b)(2)f. and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) for VOC only, OAC rule 3745-17-07(A), and OAC rule 3745-17-08(B).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Particulate emissions (PE) (filterable and condensable) shall not exceed 0.14 pound per hour.  Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 0.10 pound per hour.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Emissions of nitrogen oxides (NOx) shall not exceed 0.25 pound per hour and 1.07 TPY.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.21 pound per hour and 0.90 TPY.</p> <p>See b)(2)a, b)(2)f., and c)(1).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) for PE and PM10 only, OAC rule 3745-17-07(A), and OAC rule 3745-17-07(B).</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
f.	OAC rule 3745-17-11(B)	<p>The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001.</p> <p>Stack particulate emissions (PE) from this emissions unit shall not exceed 5.27 pounds per hour pursuant to the policy of implementing OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006.</p>
g.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code

(ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10), oxides of nitrogen (NOx), or carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, NOx, and CO is less than 10.0 TPY.

- c. Compliance with OAC rule 3745-31-05(A)(3) ), as effective 11/30/2001, shall be demonstrated by the production limitations, emission limitations, and the use of a rotoclone.
- d. The hourly emission limitations for VOC, PE, and PM10 are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
- e. The hourly and annual emission limitations for NOx and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- f. The rotoclone on this emissions unit shall have a control efficiency of at least 20% for VOC and a control efficiency of at least 30% for PE.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.

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 emissions of 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.

e) Reporting Requirements

- (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (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 emissions limitations in b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
  - a. Emission Limitation:  
  
Stack volatile organic compound (VOC) emissions shall not exceed 3.84 pounds per hour.

**Applicable Compliance Method:**

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential stack VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

VOC emissions = (3343 lbs of cooked product/hr)/(2000 lbs/ton) x (2.87 lbs of stack VOC/ton of cooked product) x (1 - 20% control efficiency for VOC).

**b. Emission Limitation:**

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

**Applicable Compliance Method:**

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

**c. Emission Limitation:**

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

**Applicable Compliance Method:**

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

**d. Emission Limitation:**

The uncontrolled potential to emit for PE and PM10 emissions from this emissions unit is less than ten tons per year.

Particulate emissions (PE) (filterable and condensable) shall not exceed 0.14 pound per hour.

Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 0.10 pound per hour.

Applicable Compliance Method:

The potential stack annual PE rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual stack PE rate for emissions unit P005 was determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$PE = (3343 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PE/ton of cooked product}) \times (7300 \text{ hours per year maximum}) \times (1 - 30\% \text{ control efficiency for PE}) / (2000 \text{ lbs/ton}) = 0.51 \text{ ton per year of PE.}$$

The potential annual stack PM10 emission rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual stack PM10 emission rate for emissions unit P005 was determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$PM10 = (3343 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PE/ton of cooked product}) \times (7300 \text{ hours per year maximum}) \times (1 - 30\% \text{ control efficiency for PE}) / (2000 \text{ lbs/ton}) \times (70\% \text{ of PE are assumed to be PM10}) = 0.35 \text{ ton per year of PM10.}$$

The hourly emission limitation is based upon the emissions unit's controlled potential to emit. Potential hourly stack PE were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$PE = (3343 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) = 0.14 \text{ pound per hour.}$$

The hourly emission limitation is based upon the emissions unit's controlled potential to emit. Potential hourly stack PM10 were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$PM10 = (3343 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) = 0.10 \text{ pound per hour.}$$

e. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 0.25 pound per hour and 1.07 TPY.

**Applicable Compliance Method:**

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NO<sub>x</sub> emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

NO<sub>x</sub> emissions hourly = (2451 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NO<sub>x</sub> emissions annually = (2451 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

**f. Emission Limitation:**

Carbon monoxide (CO) emissions shall not exceed 0.21 pound per hour and 0.90 TPY.

**Applicable Compliance Method:**

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

CO emissions hourly = (2451 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (2451 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

**g. Emission Limitation:**

Stack particulate emissions (PE) from this emissions unit shall not exceed 5.27 lb/hr.

**Applicable Compliance Method:**

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

**g) Miscellaneous Requirements**

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



6. P006, Line 6 - Sear/Impinge

Operations, Property and/or Equipment Description:

Cook Line 6 - Sear/Impinge

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)d.

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)	Stack particulate emissions (PE) (filterable and condensable) shall not exceed 5.68 pounds per hour.  Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 3.98 pounds per hour.  Volatile organic compound (VOC) stack emissions shall not exceed 2.84 pounds per hour.  See b)(2)f., c)(1) and c)(2).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3), as	Emissions of nitrogen oxides (NOx) shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 11/30/2001	not exceed 0.42 pound per hour and 1.83 TPY. Carbon monoxide (CO) emissions shall not exceed 0.35 pound per hour and 1.53 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
g.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to oxides of nitrogen (NOx) or carbon monoxide (CO)

emissions from this air contaminant source since the uncontrolled potential to emit for NO<sub>x</sub> and CO is less than 10.0 TPY.

- c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitations, emission limitations, and the use of a rotoclone.
- d. The hourly emission limitations for VOC, PE, and PM<sub>10</sub> are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
- e. The hourly and annual emission limitations for NO<sub>x</sub> and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- f. The rotoclone on this emissions unit shall have a control efficiency of at least 30% for PE and a control efficiency of at least 20% for VOC.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.
- (2) The permittee shall produce no Angus beef product in this emissions unit.

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 emissions of 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.

e) Reporting Requirements

- (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (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 emissions limitations in b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
  - a. Emission Limitation:

Stack particulate emissions (PE) (filterable and condensable) shall not exceed 5.68 pounds per hour.

Applicable Compliance Method:

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential stack PE were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$PE = (4891 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (3.32 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PE}).$$
  - b. Emission Limitation:

Stack particulate matter emissions (filterable and condensable) 10 microns and less in diameter (PM10) shall not exceed 3.98 pounds per hour.

**Applicable Compliance Method:**

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential PM<sub>10</sub> emissions (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

PM<sub>10</sub> emissions = (4891 lbs of cooked product/hr)/(2000 lbs/ton) x (3.32 lbs of stack PE/ton of cooked product) x (1 - 30% control efficiency for PE) x (70% of PE are assumed to be PM<sub>10</sub>).

**c. Emission Limitation:**

Volatile organic compound (VOC) stack emissions shall not exceed 2.84 pounds per hour.

**Applicable Compliance Method:**

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential stack VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

Stack VOC emissions = (4891 lbs of cooked product/hr)/(2000 lbs/ton) x (1.45 lbs of stack VOC/ton of cooked product) x (1 - 20% control efficiency for VOC).

**d. Emission Limitation:**

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

**Applicable Compliance Method:**

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

## e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

## Applicable Compliance Method:

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

## f. Emission Limitation:

Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 0.42 pound per hour and 1.83 TPY.

## Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NO<sub>x</sub> emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

NO<sub>x</sub> emissions hourly = (4167 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NO<sub>x</sub> emissions annually = (4167 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

## g. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.35 pound per hour and 1.53 TPY.

## Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

CO emissions hourly = (4167 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (4167 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

## g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



7. P007, Line 7 - Sear/Impinge

Operations, Property and/or Equipment Description:

Cook Line 7 - Sear/Impinge

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)e.

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)	Stack particulate emissions (PE) (filterable and condensable) shall not exceed 3.04 pounds per hour.  Stack volatile organic compound (VOC) emissions shall not exceed 9.46 pounds per hour.  See b)(2)g. and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.13 pounds per hour and 7.77 TPY.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions of nitrogen oxides (NOx) shall not exceed 0.78 pound per hour and 3.44 TPY.  Carbon monoxide (CO) emissions shall not exceed 0.66 pound per hour and 2.89 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(E), as effective 12/1/2006	See b)(2)c.
e.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.
g.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.
h.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to oxides of nitrogen (NO<sub>x</sub>) or carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for NO<sub>x</sub> and CO is less than 10.0 TPY.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Federally enforceable permit to install and operate 14-06026 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):

- i. For particulate matter emissions 10 microns and less in diameter (PM<sub>10</sub>): the emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.
  - ii. The wet scrubber on this emissions unit shall have a control efficiency of at least 80% for PM<sub>10</sub>.
  - iii. Operating this emissions unit at 7300 hours per year.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitations, emission limitations, and the use of a wet scrubber.
- e. The hourly emission limitations for PE and VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
- f. The hourly and annual emission limitations for PM<sub>10</sub>, NO<sub>x</sub>, and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- g. The wet scrubber on this emissions unit shall have a control efficiency of at least 80% for PE and a control efficiency of at least 20% for VOC.
- h. Control of Particulate Emissions
- i. The Permittee shall install, operate, and maintain a venturi scrubber and mist eliminator system on this emissions unit for the control of particulate emissions, which shall be operated to comply with the particulate emission rates in this permit.
  - ii. The permittee shall have an engineer with demonstrated experience in the design of air quality control systems perform an engineering review of the design specifications of the as-built components of the total air pollution control system for the purpose of documenting that the capability of the scrubber control system performing as it was designed. This

evaluation shall also consider all operating parameters which represent normal operating conditions for this emissions unit. This evaluation shall be performed within 60 days of permit issuance. A report detailing the findings of the evaluation shall be submitted to Hamilton County Department of Environmental Services within 75 days of permit issuance.

Particulate emission limitations and control efficiencies specified in this permit are subject to revision once initial testing required in f) of this permit and the system design evaluation requirement described above have been completed, reviewed and approved by Ohio EPA.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) while cooking is occurring on 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 across the scrubber and the scrubber liquid flow rate on a once per day basis.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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. a description of the corrective action;

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

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

The acceptable range for the pressure drop across the scrubber, that shall be maintained in order to demonstrate compliance, is 51 inches of water to 63 inches of water. The minimum limit for the liquid flow rate, that shall be maintained in order to demonstrate compliance, is at or above 110 gallons per minute.

These range(s) and/or limit(s) are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future emission tests that demonstrate compliance with the allowable PE, PM10, and VOC emission rates for this emissions unit. In addition, approved revisions to the ranges 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.

- (2) 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 emissions of 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.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the acceptable range or limit;
  - b. an identification of each incident of deviation described in "a" (above) 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 or limit, 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(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(3) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

## f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:

## a. Emission Limitation:

Stack particulate emissions (PE) (filterable and condensable) shall not exceed 3.04 pounds per hour.

## Applicable Compliance Method:

The permittee shall conduct, or have conducted, stack emission testing for emissions unit P007 in accordance with the following requirements:

- i. The emission testing shall be conducted within 120 days after final issuance of this permit 14-06026;
- ii. The stack emission testing shall be conducted to demonstrate compliance with the allowable stack mass emission rate(s) for PE, in the appropriate averaging period(s);
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 5 as outlined in 40 CFR Part 60, Appendix A. Front half and back half emissions should be analyzed for purposes of compliance determination due to high condensable particulate emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.

- vii. 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.

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential stack PE (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$PE = (6093 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}).$

- b. Emission Limitation:

Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.13 pounds per hour and 7.77 TPY.

Applicable Compliance Method:

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential stack PM10 emissions (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$PM10 \text{ emissions} = (6093 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) = 2.13 \text{ pounds per hour}.$

The annual PM10 is 2.13 pounds per hour X 7300 hours per year divided by 2000 lbs per ton.

- c. Emission Limitation:

Stack volatile organic compound (VOC) emissions shall not exceed 9.46 pounds per hour.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for emissions unit P007 in accordance with the following requirements:

- i. The stack emission testing shall be conducted within 120 days after final issuance of this permit 14-06026;
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable stack mass emission rate(s) for VOC, in the appropriate averaging period(s);

- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 25 as outlined in 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.
- vii. 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.

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential VOC stack emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

VOC emissions = (6093 lbs of cooked product/hr)/(2000 lbs/ton) x (3.88 lbs of stack VOC/ton of cooked product) x (1 - 20% control efficiency for VOC).

- d. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

Applicable Compliance Method:

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

f. Emission Limitation:

Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 0.78 pound per hour and 3.44 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NO<sub>x</sub> emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

NO<sub>x</sub> emissions hourly = (7843 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NO<sub>x</sub> emissions annually = (7843 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.66 pound per hour and 2.89 TPY.

**Applicable Compliance Method:**

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

CO emissions hourly = (7843 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (7843 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

**g) Miscellaneous Requirements**

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



8. P008, Line 8 - Sear/Impinge

Operations, Property and/or Equipment Description:

Cook Line 8 - Sear/Impinge

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)e.

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)	Stack particulate emissions (PE) (filterable and condensable) shall not exceed 3.04 pounds per hour.  Stack volatile organic compound (VOC) emissions shall not exceed 9.46 pounds per hour.  See b)(2)g. and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.13 pounds per hour and 7.77 TPY.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions of nitrogen oxides (NOx) shall not exceed 0.78 pound per hour and 3.44 TPY.  Carbon monoxide (CO) emissions shall not exceed 0.66 pound per hour and 2.89 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(E), as effective 12/1/2006	See b)(2)c.
e.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.
g.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.
h.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to oxides of nitrogen (NOx) or carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO is less than 10.0 TPY.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Federally enforceable permit to install and operate 14-06026 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):

- i. for particulate matter emissions 10 microns and less in diameter (PM10): the emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.
  - ii. The wet scrubber on this emissions unit shall have a control efficiency of at least 80% for PM10.
  - iii. Operating this emissions unit at 7300 hours per year.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitations, emission limitations, and the use of a wet scrubber.
- e. The hourly emission limitations for PE and VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
- f. The hourly and annual emission limitations for PM10, NOx and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- g. The wet scrubber on this emissions unit shall have a control efficiency of at least 80% for PE and a control efficiency of at least 20% for VOC.
- h. Control of Particulate Emissions
- i. The Permittee shall install, operate, and maintain a venturi scrubber and mist eliminator system on this emissions unit for the control of particulate emissions, which shall be operated to comply with the particulate emission rates in this permit.
  - ii. The permittee shall have an engineer with demonstrated experience in the design of air quality control systems perform an engineering review of the design specifications of the as-built components of the total air pollution control system for the purpose of documenting that the capability of the scrubber control system performing as it was designed. This

evaluation shall also consider all operating parameters which represent normal operating conditions for this emissions unit. This evaluation shall be performed within 60 days of permit issuance. A report detailing the findings of the evaluation shall be submitted to Hamilton County Department of Environmental Services within 75 days of permit issuance.

Particulate emission limitations and control efficiencies specified in this permit are subject to revision once initial testing required in f) of this permit and the system design evaluation requirement described above have been completed, reviewed and approved by Ohio EPA.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) while cooking is occurring on 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 across the scrubber and the scrubber liquid flow rate on a once per day basis.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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. a description of the corrective action;

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

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

The acceptable range for the pressure drop across the scrubber, that shall be maintained in order to demonstrate compliance, is 51 inches of water to 63 inches of water. The minimum limit for the liquid flow rate, that shall be maintained in order to demonstrate compliance, is at or above 110 gallons per minute.

These range(s) and/or limit(s) are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future emission tests that demonstrate compliance with the allowable PE, PM10, and VOC emission rates for this emissions unit. In addition, approved revisions to the ranges 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.

- (2) 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 emissions of 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.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the acceptable range or limit;
  - b. an identification of each incident of deviation described in "a" (above) 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 or limit, 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(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

## f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:

## a. Emission Limitation:

Stack particulate emissions (PE) (filterable and condensable) shall not exceed 3.04 pounds per hour.

## Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for emissions unit P008 in accordance with the following requirements:

- i. The stack emission testing shall be conducted within 9 months after issuance of this permit 14-06026;
- ii. The stack emission testing shall be conducted to demonstrate compliance with the allowable stack mass emission rate(s) for PE, in the appropriate averaging period(s);
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 5 as outlined in 40 CFR Part 60, Appendix A. Front half and back half emissions should be analyzed for purposes of compliance determination due to high condensable particulate emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.

- vii. 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.

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential stack PE (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$PE = (6093 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}).$

- b. Emission Limitation:

Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.13 pounds per hour and 9.32 TPY.

Applicable Compliance Method:

The hourly stack emission limitation is based upon the emissions unit's potential to emit. Potential stack PM10 emissions (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$PM10 \text{ emissions} = (6093 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}) = 2.13 \text{ pounds per hour}.$

The annual PM10 is 2.13 pounds per hour X 7300 hours per year divided by 2000 lbs per ton.

- c. Emission Limitation:

Stack volatile organic compound (VOC) emissions shall not exceed 9.46 pounds per hour.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for emissions unit P008 in accordance with the following requirements:

- i. The stack emission testing shall be conducted within 9 months after issuance of this permit 14-06026;
- ii. The stack emission testing shall be conducted to demonstrate compliance with the allowable stack mass emission rate(s) for VOC, in the appropriate averaging period(s);



- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 25 as outlined in 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.
- vii. 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.

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

VOC emissions = (6093 lbs of cooked product/hr)/(2000 lbs/ton) x (3.88 lbs of stack VOC/ton of cooked product) x (1 - 20% control efficiency for VOC).

- d. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

Applicable Compliance Method:

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

f. Emission Limitation:

Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 0.78 pound per hour and 3.44 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NO<sub>x</sub> emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

NO<sub>x</sub> emissions hourly = (7843 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NO<sub>x</sub> emissions annually = (7843 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.66 pound per hour and 2.89 TPY.

**Applicable Compliance Method:**

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

CO emissions hourly = (7843 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (7843 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

**g) Miscellaneous Requirements**

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-02305, as issued on November 25, 1992, for this emissions unit.



9. P009, Line 9 - Sear/Impinge

Operations, Property and/or Equipment Description:

Cook Line 9 - Sear/Impinge

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)d.

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)	Stack particulate emissions (PE) (filterable and condensable) shall not exceed 4.20 pounds per hour.  Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.94 pounds per hour.  Stack volatile organic compound (VOC) emissions shall not exceed 13.1 pounds per hour.  See b)(2)f. and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3), as	Emissions of nitrogen oxides (NOx) shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 11/30/2001	not exceed 0.76 pound per hour and 3.35 TPY. Carbon monoxide (CO) emissions shall not exceed 0.64 pound per hour and 2.81 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.
f.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.
g.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to oxides of nitrogen (NOx) or carbon monoxide (CO)

emissions from this air contaminant source since the uncontrolled potential to emit for NO<sub>x</sub> and CO is less than 10.0 TPY.

- c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitations, emission limitations, and the use of a wet scrubber.
- d. The hourly emission limitations for PE, PM<sub>10</sub>, and VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
- e. The hourly and annual emission limitations for NO<sub>x</sub> and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- f. The wet scrubber on this emissions unit shall have a control efficiency of at least 80% for PE and a control efficiency of at least 20% for VOC.
- g. Control of Particulate Emissions
  - i. The Permittee shall install, operate, and maintain a venturi scrubber and mist eliminator system on this emissions unit for the control of particulate emissions, which shall be operated to comply with the particulate emission rates in this permit.
  - ii. The permittee shall have an engineer with demonstrated experience in the design of air quality control systems perform an engineering review of the design specifications of the as-built components of the total air pollution control system for the purpose of documenting that the capability of the scrubber control system performing as it was designed. This evaluation shall also consider all operating parameters which represent normal operating conditions for this emissions unit. This evaluation shall be performed within 60 days of permit issuance. A report detailing the findings of the evaluation shall be submitted to Hamilton County Department of Environmental Services within 75 days of permit issuance.

Particulate emission limitations and control efficiencies specified in this permit are subject to revision once initial testing required in section f) of this permit and the system design evaluation requirement described above have been completed, reviewed and approved by Ohio EPA.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) while cooking is occurring on 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 across the scrubber and the scrubber liquid flow rate on a once per day basis.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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. a description of the corrective action;
- b. the date the corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) of the deviation;
- e. the pressure drop and flow rate readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

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

The acceptable range for the pressure drop across the scrubber, that shall be maintained in order to demonstrate compliance, is 51 inches of water to 63 inches of water. The minimum limit for the liquid flow rate, that shall be maintained in order to demonstrate compliance, is at or above 110 gallons per minute.

These range(s) and/or limit(s) are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio

EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future emission tests that demonstrate compliance with the allowable PE, PM10, and VOC emission rates for this emissions unit. In addition, approved revisions to the ranges 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.

- (2) 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 emissions of 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.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the scrubber during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the acceptable range or limit;
  - b. an identification of each incident of deviation described in "a" (above) 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 or limit, 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(s), as identified in the monitoring and record keeping requirements of this permit.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
    - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
  - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) **Testing Requirements**
  - (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
    - a. **Emission Limitation:**

Stack particulate emissions (PE) (filterable and condensable) shall not exceed 4.20 pounds per hour.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for emissions unit P009 in accordance with the following requirements:

      - i. The stack emission testing shall be conducted within 14 months after issuance of this permit 14-06026;
      - ii. The stack emission testing shall be conducted to demonstrate compliance with the allowable stack mass emission rate(s) for PE, in the appropriate averaging period(s);

- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 5 as outlined in 40 CFR Part 60, Appendix A. Front half and back half emissions should be analyzed for purposes of compliance determination due to high condensable particulate emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. Compliance with OAC rule 3745-17-11 shall use the front half only.;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.
- vii. 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.

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential PE (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$PE = (8418 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}).$$

- b. Emission Limitation:

Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.94 pounds per hour.

## Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential PM10 emissions (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{PM10 emissions} = (8418 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}).$$

## c. Emission Limitation:

Stack volatile organic compound (VOC) emissions shall not exceed 13.1 pounds per hour.

## Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for emissions unit P009 in accordance with the following requirements:

- i. The stack emission testing shall be conducted within 14 months after issuance of this permit 14-06026;
- ii. The stack emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC, in the appropriate averaging period(s);
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 25 as outlined in 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.

- vii. 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.

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

VOC emissions = (8418 lbs of cooked product/hr)/(2000 lbs/ton) x (3.88 lbs of stack VOC/ton of cooked product) x (1 - 20% control efficiency for VOC).

- d. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
  - ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
  - iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
  - iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.
- e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

Applicable Compliance Method:

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

f. Emission Limitation:

Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 0.76 pound per hour and 3.35 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NO<sub>x</sub> emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

NO<sub>x</sub> emissions hourly = (7647 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NO<sub>x</sub> emissions annually = (7647 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.64 pound per hour and 2.81 TPY.

Applicable Compliance Method:

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

CO emissions hourly = (7647 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (7647 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05341, as issued on July 7, 2005, and permit to install 14-05341, as issued on September 12, 2002, for this emissions unit.



10. P010, Line 10 - Sear/Impinge

Operations, Property and/or Equipment Description:

Cook Line 10 - Sear/Impinge

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)d.

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)	Stack particulate emissions (PE) (filterable and condensable) shall not exceed 4.20 pounds per hour.  Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.94 pounds per hour.  Stack volatile organic compound (VOC) emissions shall not exceed 13.1 pounds per hour.  See b)(2)f. and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3), as	Emissions of nitrogen oxides (NOx) shall

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 11/30/2001	not exceed 0.76 pound per hour and 3.35 TPY. Carbon monoxide (CO) emissions shall not exceed 0.64 pound per hour and 2.81 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V permitting	See b) of Section B.1.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.
f.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.
g.	OAC rule 3745-17-011(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to oxides of nitrogen (NOx) or carbon monoxide (CO)

emissions from this air contaminant source since the uncontrolled potential to emit for NO<sub>x</sub> and CO is less than 10.0 TPY.

- c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitations, emission limitations, and the use of a wet scrubber.
- d. The hourly emission limitations for PE, PM<sub>10</sub>, and VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.
- e. The hourly and annual emission limitations for NO<sub>x</sub> and CO are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limitations.
- f. The wet scrubber on this emissions unit shall have a control efficiency of at least 80% for PE and a control efficiency of at least 20% for VOC.
- g. Control of Particulate Emissions
  - i. The Permittee shall install, operate, and maintain a venturi scrubber and mist eliminator system on this emissions unit for the control of particulate emissions, which shall be operated to comply with the particulate emission rates in this permit.
  - ii. The permittee shall have an engineer with demonstrated experience in the design of air quality control systems perform an engineering review of the design specifications of the as-built components of the total air pollution control system for the purpose of documenting that the capability of the scrubber control system performing as it was designed. This evaluation shall also consider all operating parameters which represent normal operating conditions for this emissions unit. This evaluation shall be performed within 60 days of permit issuance. A report detailing the findings of the evaluation shall be submitted to Hamilton County Department of Environmental Services within 75 days of permit issuance.

Particulate emission limitations and control efficiencies specified in this permit are subject to revision once initial testing required in f) of this permit and the system design evaluation requirement described above have been completed, reviewed and approved by Ohio EPA.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) while cooking is occurring on 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 across the scrubber and the scrubber liquid flow rate on a once per day basis.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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. a description of the corrective action;
- b. the date the corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) of the deviation;
- e. the pressure drop and flow rate readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

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

The acceptable range for the pressure drop across the scrubber, that shall be maintained in order to demonstrate compliance, is 51 inches of water to 63 inches of water. The minimum limit for the liquid flow rate, that shall be maintained in order to demonstrate compliance, is at or above 110 gallons per minute.

These range(s) and/or limit(s) are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio

EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future emission tests that demonstrate compliance with the allowable PE, PM10, and VOC emission rates for this emissions unit. In addition, approved revisions to the ranges 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.

- (2) 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 emissions of 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.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the scrubber during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the acceptable range or limit;
  - b. an identification of each incident of deviation described in "a" (above) 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 or limit, 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(s), as identified in the monitoring and record keeping requirements of this permit.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(3) above:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
    - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.
  - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be demonstrated by the following methods:
    - a. Emission Limitation:

Stack particulate emissions (PE) (filterable and condensable) shall not exceed 4.20 pounds per hour.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for emissions unit P010 in accordance with the following requirements:

      - i. The stack emission testing shall be conducted within 18 months after issuance of this permit 14-06026;
      - ii. The stack emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, in the appropriate averaging period(s);

- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 5 as outlined in 40 CFR Part 60, Appendix A. Front half and back half emissions should be analyzed for purposes of compliance determination due to high condensable particulate emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. Compliance with OAC rule 3745-17-11 shall use the front half only.;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.
- vii. 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.

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential PE (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$PE = (8418 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}).$$

- b. Emission Limitation:

Stack particulate matter emissions 10 microns and less in diameter (PM10) (filterable and condensable) shall not exceed 2.94 pounds per hour.

## Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential PM10 emissions (filterable and condensable) were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

$$\text{PM10 emissions} = (8418 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (4.99 \text{ lbs of stack PE/ton of cooked product}) \times (1 - 80\% \text{ control efficiency for PE}) \times (70\% \text{ of PE are assumed to be PM10}).$$

## c. Emission Limitation:

Stack volatile organic compound (VOC) emissions shall not exceed 13.1 pounds per hour.

## Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for emissions unit P010 in accordance with the following requirements:

- i. The stack emission testing shall be conducted within 18 months after issuance of this permit 14-06026;
- ii. The stack emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC, in the appropriate averaging period(s);
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 25 as outlined in 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- iv. At both the inlet and outlet, 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.
- v. 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).
- vi. 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.

- vii. 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.

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

VOC emissions = (8418 lbs of cooked product/hr)/(2000 lbs/ton) x (3.88 lbs of stack VOC/ton of cooked product) x (1 - 20% control efficiency for VOC).

- d. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

- e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

**Applicable Compliance Method:**

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

f. **Emission Limitation:**

Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 0.76 pound per hour and 3.35 TPY.

**Applicable Compliance Method:**

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential NO<sub>x</sub> emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

NO<sub>x</sub> emissions hourly = (7647 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1).

NO<sub>x</sub> emissions annually = (7647 CF natural gas/hr) x (100 lbs NO<sub>x</sub> / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g. **Emission Limitation:**

Carbon monoxide (CO) emissions shall not exceed 0.64 pound per hour and 2.81 TPY.

**Applicable Compliance Method:**

The hourly and annual stack emission limitations are based upon the emissions unit's potential to emit. Potential CO emissions were determined based on the following equations from the permittee-supplied information in FEPTIO application 14-06026 as submitted on February 21, 2008:

CO emissions hourly = (7647 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1).

CO emissions annually = (7647 CF natural gas/hr) x (84 lbs CO / 1,000,000 CF natural gas AP-42, Table 1.4-1) x (8,760 hours per year) / (2000 lbs/ton).

g) **Miscellaneous Requirements**

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05341, as issued on July 7, 2005, and permit to install 14-05341, as issued on September 12, 2002, for this emissions unit.