Ohio Environmental Protection Agency

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

Certified Mail

7/28/2010

No	TOXIC REVIEW
No	PSD
No	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)

Troy Brunn
Worthington Foods, Inc.
1675 Fairview Road
Zanesville, OH 43701

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0660010264
Permit Number: P0104786
Permit Type: OAC Chapter 3745-31 Modification
County: Muskingum

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-SEDO

Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0660010264
Facility Name:	Worthington Foods, Inc.
Facility Description:	
Facility Address:	1675 Fairview Road Zanesville, OH 43701 Muskingum County
Permit #:	P0104786, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Times Recorder on 03/02/2010. The comment period ended on 04/01/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **Comments were received from the permittee during the draft comment period, and responses are detailed in correspondence with the permittee located in the facility file.**
    a. Comment: **None**
    b. Response: **None**
2. Topic: **None**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

FINAL

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

Facility ID:	0660010264
Permit Number:	P0104786
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	7/28/2010
Effective:	7/28/2010
Expiration:	7/28/2015

Ohio | Environmental Protection Agency

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

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Authorization

Facility ID: 0660010264
Application Number(s): A0037262
Permit Number: P0104786
Permit Description: Modification of 3 previously unpermitted fryers to increase the throughput. Worthington Foods is requesting a federally enforceable limit for VOC emissions of 9.90 tons per 12 month rolling period for each fryer.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $1,500.00
Issue Date: 7/28/2010
Effective Date: 7/28/2010
Expiration Date: 7/28/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Worthington Foods, Inc.
1675 Fairview Road
Zanesville, OH 43701

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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: P0104786
Permit Description: Modification of 3 previously unpermitted fryers to increase the throughput. Worthington Foods is requesting a federally enforceable limit for VOC emissions of 9.90 tons per 12 month rolling period for each fryer.

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

Emissions Unit ID:	**P002**
Company Equipment ID:	Phase II Fryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: **natural gas fryers**

Emissions Unit ID:	**P001**
Company Equipment ID:	Phase I Fryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Phase III Fryer
Superseded Permit Number:	
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 Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] 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

[1] 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).

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.

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) None.

C. Emissions Unit Terms and Conditions

1. P002, Phase II Fryer

Operations, Property and/or Equipment Description:

Deep fat fryer using indirect heat (process steam). This modification is to allow an increase in the maximum production rate. This fryer is equipped with a mesh-type mist eliminator.

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. g)(1)

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

a. b)(1)b., c)(1), d)(2), e)(1).

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 11/30/01	Emissions of volatile organic compounds (VOC) shall not exceed 16.3 lbs/hr. Emissions of Particulate Matter (PM) shall not exceed 1.52 lb/hr and 6.66 tons per year (TPY). See b)(2)a.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	Emissions of VOC shall not exceed 9.90 tons per rolling 12-month period. See c)(1) and b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
d.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions (PE) shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11	PE from cooking stack shall not exceed

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Table I)	6.3 lb/hr.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant 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 revision 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 3745-31-05, then these emission limits/control measures no longer apply.

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

i. Permit to Install and operate P0104786 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 purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for VOC emissions.

(a) 9.90 tons of VOC per rolling, 12-month period, as restricted in c)(1) below.

ii. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Particulate Emissions (PE) from this air contaminant source since the uncontrolled potential to emit for PE are less than ten tons per year.

c) Operational Restrictions

(1) Flavoring usage, and amount of product fried shall not cause VOC emissions to exceed 9.90 tons per rolling, 12-month period based on the following equations:

a. <u>Monthly VOC from flavorings</u>:

$$\sum_{i=1}^{n} (a_i * c_i) / 2{,}000 \text{ lbs/ton}$$

a_i = the amount of flavoring i used, in pounds, during the month;

c_i = VOC content of flavoring i, as percent by weight;

b. Monthly potential VOC from product deep fat frying:

0.059 ton VOC (based on worst case emissions calculation provided by permittee in application No. A0037262).

c. Total monthly VOC

Total monthly VOC = VOC from flavorings + 0.059 ton VOC from deep fat frying

d. Total VOC per rolling, 12-month period

$$\sum_{i=1}^{12} \text{total monthly VOC}$$

i = calendar month

Total VOC for the rolling, 12-month period ≤ 9.90 tons

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

Note: The presence of water vapor in the plume does not constitute 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 maintain monthly records of the following information:

a. the company identification of each product fried and each flavoring used;

b. the VOC content of each flavoring used, as percent by weight;

c. the amount of each VOC-containing flavoring used, in pounds;

d. total VOC emissions from volatilization of flavorings (calculated per c)(1)a.), in tons;

e. potential VOC emissions from product deep-fat frying, in tons;

f. total VOC emissions (d + e); and

g. rolling, 12-month total VOC emissions.

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions 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:

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

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall

cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emissions Limitation:

Emissions of VOC shall not exceed 16.3 lbs/hr.

Applicable Compliance Method:

The VOC limitation was established for PTI purposes to reflect the emissions unit's "worst case" potential to emit and was calculated based on the highest VOC content flavoring as follows:

VOC from flavoring

Max operating rate in lbs/hr * percent of flavoring in product * percent VOC in flavoring = 16.15 lbs/hr

VOC from frying

Max operating rate in ton/hr * the emissions factor provided in permittee application No. A0037262 = 0.162 lb/hr

Total VOC

16.15 + 0.162 = 16.3 lbs/hr

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

Emissions of Particulate Matter (PM) shall not exceed 1.52 lb/hr and 6.66 tons per year (TPY).

Applicable Compliance Method:

The PM limitation was established for PTI purposes to reflect the emissions unit's potential to emit and was calculated based on the maximum capacity of the emissions unit as follows:

Max operating rate in ton/hr * the emissions factor provided in permittee application No. A0037262 = 1.52 lb/hr

Annual PM

(1.52 lb/hr * 8760 hr/year)/2000 lbs/ton = 6.65 TPY

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitation:

Emissions of VOC shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method:

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the rolling, 12-month emission limit shall be based on the record keeping in d)(2) and the calculations in c)(1). This limit was requested by the permittee.

d. Emissions Limitation:

Visible PE shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

e. Emissions Limitation:

PE from cooking stack shall not exceed 6.3 lb/hr.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office, and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

2. Emissions Unit Group - natural gas fryers: P001, P003,

EU ID	Operations, Property and/or Equipment Description
P001	Deep fat fryer burning 2.45 MMBtu/hr natural gas. This modification is to allow an increase in the maximum production rate. Equipped with a mesh-type mist eliminator.
P003	Deep fat fryer burning 2.45 MMBtu/hr natural gas. This modification is to allow an increase in the maximum production rate. Equipped with a mesh-type mist eliminator.

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. g)(1)

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

a. b)(1)b., c)(1), d)(3), e)(2).

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 11/30/01	Emissions of volatile organic compounds (VOC) shall not exceed 16.3 lbs/hr. Emissions of Particulate Matter (PM) shall not exceed 1.54 lb/hr and 6.75 tons per year (TPY). Emissions of Nitrogen Oxides (NO_x) shall not exceed 0.26 lb/hr and 1.13 tons per year (TPY). Emissions of Carbon Monoxide (CO) shall not exceed 0.22 lb/hr and 0.95 tons per year (TPY). Emissions of Sulfur Dioxide (SO_2) shall not exceed 0.002 lb/hr and 0.01 tons per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		year (TPY). See b)(2)a.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	Emissions of VOC shall not exceed 9.90 tons per rolling 12-month period. See c)(1) and b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), As effective 12/01/06	See b)(2)b. below.
d.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions (PE) shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) from combustion stack shall not exceed 0.020 lb per million Btu.
f.	OAC rule 3745-17-11 (Table I)	PE from cooking stack shall not exceed 6.3 lb/hr.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant 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 revision 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 3745-31-05, then these emission limits/control measures no longer apply.

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

i. Permit to Install and operate P0104786 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 purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for VOC emissions.

(a) 9.90 tons of VOC per rolling, 12-month period, as restricted in c)(1) below.

ii. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Particulate Emissions (PE), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and Carbon Monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for PE, NOx, SOx, and CO emissions are less than ten tons per year.

c) Operational Restrictions

(1) Flavoring usage, and amount of product fried shall not cause VOC emissions to exceed 9.90 tons per rolling, 12-month period based on the following equations:

a. Monthly VOC from flavorings:

$$\sum_{i=1}^{n} (a_i * c_i) / 2{,}000 \text{ lbs/ton}$$

a_i = the amount of flavoring i used, in pounds, during the month;

c_i = VOC content of flavoring i, as percent by weight;

b. Monthly potential VOC from fuel burning:

1.88 MMscf natural gas (maximum possible natural gas burned in a month) * 5.5 lb VOC/MMscf) / 2,000 lb/ton = 0.005 ton VOC

emission factor from AP-42 table1.4-2, 07/1998

c. Monthly potential VOC from product deep fat frying:

0.059 ton VOC (based on worst case emissions calculation provided by permittee in application No. A0037262).

d. Total monthly VOC

Total monthly VOC = VOC from flavorings + 0.005 ton VOC from fuel burning + 0.059 ton VOC from deep fat frying

e. Total VOC per rolling, 12-month period

$$\sum_{i=1}^{12} \text{total monthly VOC}$$

i = calendar month

Total VOC per rolling 12-month period ≤ 9.90 tons

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

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

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

Note: The presence of water vapor in the plume does not constitute 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.

(3) The permittee shall maintain monthly records of the following information:

a. the company identification of each product fried and flavoring used;

b. the VOC content of each flavoring used, as percent by weight;

c. the amount of each VOC-containing flavoring used, in pounds;

d. total VOC emissions from volatilization of flavorings (calculated per c)(1)a.), in tons;

e. total VOC emissions from flavorings, deep-fat frying, and combustion (d. + 0.059 + 0.005); and

f. rolling, 12-month total VOC emissions.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) 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:

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

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).

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

a. <u>Emissions Limitation</u>:

Emissions of VOC shall not exceed 16.3 lbs/hr.

Applicable Compliance Method:

The VOC limitation was established for PTI purposes to reflect the emissions unit's "worst case" potential to emit and was calculated based on the highest VOC content flavoring as follows:

VOC from flavoring

Max operating rate in lbs/hr * percent of flavoring in product * percent VOC in flavoring = 16.15 lbs/hr

VOC from frying

Max operating rate in ton/hr * the emissions factor provided in permittee application No. A0037262 = 0.162 lb/hr

VOC from fuel burning

(22.6 MMscf/year * 5.5 lbs/MMscf (AP-42, 5th Edition, Table 1.4-2, July 1998)) / 8760 hr/year = 0.014 lb/hr

Total VOC

16.15 + 0.162 + 0.014 = 16.3 lbs/hr

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

Emissions of Particulate Matter (PM) shall not exceed 1.54 lb/hr and 6.75 TPY.

Applicable Compliance Method:

The PM limitation was established for PTI purposes to reflect the emissions unit's potential to emit and was calculated based on the maximum capacity of the emissions unit as follows:

PM from frying

Max operating rate in ton/hr * the emissions factor provided in permittee application No. A0037262 = 1.52 lb/hr

PM from fuel burning

(22.6 MMscf/year * 7.6 lbs/MMscf(AP-42, 5th Edition, Table 1.4-2, July 1998)) / 8760 hr/year = 0.020 lb/hr

Total PM

1.52 lb/hr + 0.020 lb/hr = 1.54 lbs/hr

Annual PM

(1.54 lb/hr * 8760 hr/year)/2000 lbs/ton = 6.75 TPY

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitation:

Emissions of NO_x shall not exceed 0.26 lb/hr and 1.13 TPY.

Emissions of CO shall not exceed 0.22 lb/hr and 0.95 TPY.

Emissions of SO_2 shall not exceed 0.002 lb/hr and 0.01 TPY.

Applicable Compliance Method:

The NO_x, CO, and SO_2 limitations were established for PTI purposes to reflect the emissions units' potential to emit and was calculated based on the maximum capacity of the emissions unit as follows:

NO_x

(22.6 MMscf/year * 100 lbs/MMscf(AP-42, 5th Edition, Table 1.4-1, July 1998)) / 8760 hr/year = 0.26 lb/hr

Annual NO_x

(0.26 lb/hr * 8760 hr/year)/2000 lbs/ton = 1.13 TPY

CO

(22.6 MMscf/year * 84 lbs/MMscf(AP-42, 5th Edition, Table 1.4-1, July 1998)) / 8760 hr/year = 0.22 lb/hr

Annual CO

(0.22 lb/hr * 8760 hr/year)/2000 lbs/ton = 0.95 TPY

SO_2

(22.6 MMscf/year * 0.6 lbs/MMscf(AP-42, 5th Edition, Table 1.4-2, July 1998)) / 8760 hr/year = 0.002 lb/hr

Annual SO_2

(0.002 lb/hr * 8760 hr/year)/2000 lbs/ton = 0.01 TPY

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

d. Emissions Limitation:

Emissions of VOC shall not exceed 9.90 tons per rolling 12-month period.

Applicable Compliance Method:

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the rolling, 12-month emission limit shall be based on the record keeping in d)(3) and the calculations in c)(1). This limit was requested by the permittee.

e. Emissions Limitation:

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

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

f. Emissions Limitation:

Particulate emissions (PE) from combustion stack shall not exceed 0.020 lb per million Btu.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office, and the procedures specified in OAC rule 3745-17-03(B)(9).

g. Emissions Limitation:

PE from cooking stack shall not exceed 6.3 lb/hr.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office, and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.