



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

8/4/2011

Mr. Lars Laursen
Hamlet Protein Inc.
5289 Invision Drive
Findlay, OH 45840

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0332012022
Permit Number: P0108108
Permit Type: Initial Installation
County: Hancock

Certified Mail

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

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 Josh Mandel," 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, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Hamlet Protein Inc.**

Facility ID:	0332012022
Permit Number:	P0108108
Permit Type:	Initial Installation
Issued:	8/4/2011
Effective:	8/4/2011
Expiration:	8/4/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Hamlet Protein Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. P901 11
2. P902 16
3. Emissions Unit Group -Thermal Oxidizer #1: P001 & P002..... 21
4. Emissions Unit Group -Thermal Oxidizer #2: P003 & P004..... 26

Authorization

Facility ID: 0332012022
Application Number(s): A0041873, A0042343
Permit Number: P0108108
Permit Description: Installation of four production lines (with two shared thermal oxidizers) for an animal feed protein supplement.
Permit Type: Initial Installation
Permit Fee: \$1,900.00
Issue Date: 8/4/2011
Effective Date: 8/4/2011
Expiration Date: 8/4/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Hamlet Protein Inc.
5289 Invision Drive
Findlay, OH 45840

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108108

Permit Description: Installation of four production lines (with two shared thermal oxidizers) for an animal feed protein supplement.

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

Emissions Unit ID:	P901
Company Equipment ID:	P901
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P902
Company Equipment ID:	P902
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Thermal Oxidizer #1

Emissions Unit ID:	P001
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	P002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Thermal Oxidizer #2

Emissions Unit ID:	P003
Company Equipment ID:	P003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	P004
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, Northwest 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 submitting¹ 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.

¹Permittees 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).

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.

B. Facility-Wide Terms and Conditions

Final Permit-to-Install and Operate

Hamlet Protein Inc.

Permit Number: P0108108

Facility ID: 0332012022

Effective Date: 8/4/2011

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. P901

Operations, Property and/or Equipment Description:

Meal receiving with elevator, (2) 80-ton silos, and material transfer conveyors with dust collectors DC-1 and DC-2.

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. b)(1)c.

(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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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(F)	1.65 pounds particulate matter less than or equal to 10 microns (PM ₁₀); 7.23 tons PM ₁₀ /year Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the stacks associated with DC-1 and DC-2. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC rule 3745-17-08(B)	This emissions unit is not located within an "Appendix A" area, as identified in

Final Permit-to-Install and Operate

Hamlet Protein Inc.

Permit Number: P0108108

Facility ID: 0332012022

Effective Date: 8/4/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), the emissions unit is exempt from the requirements of OAC rule 3745-17-08.
g.	OAC rule 3745-17-07(B)	Pursuant to OAC rule 3745-17-11(B)(11)(e), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

(1) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:

- i. 1.65 pounds PM₁₀/hour and 7.23 tons PM₁₀/year; and
- ii. visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the stacks associated with DC-1 and DC-2.

All emissions of particulate matter from the dust collector stack are PM₁₀.

The capture systems for the dust collectors do not achieve 100% capture efficiencies from the receiving and transferring operations; however, fugitive particulate emissions are negligible and therefore have not been addressed in this permit. Additionally, the negligible amount of un-captured PE will be controlled by the building(s) containing the operations.

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.].

It should be noted that the voluntary restrictions were established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)c.].

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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should also be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration the practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].
- e. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:

- a. Dust collector DC-1 shall be capable of achieving a maximum outlet concentration of 0.01 gr/dscf for PM₁₀.
- b. Dust collector DC-2 shall be capable of achieving a maximum outlet concentration of 0.01 gr/dscf for PM₁₀.

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 PE from the stacks of the dust collectors (DC-1 and DC-2) 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

The results of the daily checks shall be kept separately for DC-1 and DC-2.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.01 gr PM₁₀/dscf (for DC-1 and DC-2)

Applicable Compliance Method:
The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the dust collectors. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - b. Emission Limitation:
1.65 pound PM₁₀/hour

Applicable Compliance Method:
The hourly limitation was established by summing the hourly emissions from DC-1 and DC-2. The following calculation shall be used to estimate the hourly emission rate for each dust collector:

Final Permit-to-Install and Operate

Hamlet Protein Inc.

Permit Number: P0108108

Facility ID: 0332012022

Effective Date: 8/4/2011

0.01 gr PM ₁₀ ⁽¹⁾	dscf ⁽²⁾	1 pound ⁽³⁾	60 minutes ⁽³⁾
dscf	minute	7,000 grains	hour

Where,

(1) Maximum outlet grain loading concentration of the dust collectors.

(2) Maximum volumetric air flow rate of the dust collector (DC-1 = 17,000; DC-2 = 2,200).

(3) Conversion factors.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

c. Emission Limitation:
7.23 tons PM₁₀/year

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:

Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the stacks associated with DC-1 and DC-2.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

2. P902

Operations, Property and/or Equipment Description:

Product bagging (50 lb bags and 1000 kg totes) with dust collector DC-4 and product storage and bulk truck loadout operation with dust free telescoping spout with aspiration and dust collector DC-5.

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. b)(1)c.

(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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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(F)	1.44 pounds particulate matter less than or equal to 10 microns (PM ₁₀); 6.31 tons PM ₁₀ /year Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the stacks associated with DC-4 and DC-5. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC rule 3745-17-08(B)	This emissions unit is not located within

Final Permit-to-Install and Operate

Hamlet Protein Inc.

Permit Number: P0108108

Facility ID: 0332012022

Effective Date: 8/4/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		an "Appendix A" area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), the emissions unit is exempt from the requirements of OAC rule 3745-17-08.
g.	OAC rule 3745-17-07(B)	Pursuant to OAC rule 3745-17-11(B)(11)(e), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:

- i. 1.44 pounds PM₁₀/hour and 6.31 tons PM₁₀/year; and
- ii. visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the stacks associated with DC-4 and DC-5.

All emissions of particulate matter from the dust collector stack are PM₁₀.

The capture systems for the dust collectors do not achieve 100% capture efficiencies from the bagging and loadout operations; however, fugitive particulate emissions are negligible and therefore have not been addressed in this permit. Additionally, the negligible amount of un-captured PE from the bagging operations will be controlled by the building containing the operations.

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.].

It should be noted that the voluntary restrictions were established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)c.].

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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should also be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration the practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].
- e. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:

- a. Dust collector DC-4 shall be capable of achieving a maximum outlet concentration of 0.01 gr/dscf for PM₁₀.
- b. Dust collector DC-5 shall be capable of achieving a maximum outlet concentration of 0.01 gr/dscf for PM₁₀.

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 PE from the stacks of the dust collectors (DC-4 and DC-5) 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. the total duration of any visible emission incident; and

- c. any corrective actions taken to eliminate the visible emissions.

The results of the daily checks shall be kept separately for DC-4 and DC-5.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.01 gr PM₁₀/dscf (for DC-4 and DC-5)

Applicable Compliance Method:
The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the dust collectors. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - b. Emission Limitation:
1.44 pound PM₁₀/hour

Applicable Compliance Method:

The hourly limitation was established by summing the hourly emissions from DC-4 and DC-5. The following calculation shall be used to estimate the hourly emission rate for each dust collector:

0.01 gr PM ₁₀ ⁽¹⁾	dscf ⁽²⁾	1 pound ⁽³⁾	60 minutes ⁽³⁾
dscf	minute	7,000 grains	hour

Where,

- (1) Maximum outlet grain loading concentration of the dust collectors.
- (2) Maximum volumetric air flow rate of the dust collector (DC-4 = 14,000; DC-5 = 2,750).
- (3) Conversion factors.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- c. Emission Limitation:
6.31 tons PM₁₀/year

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

- d. Emission Limitation:

Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the stacks associated with DC-4 and DC-5.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group -Thermal Oxidizer #1: P001 & P002

EU ID	Operations, Property and/or Equipment Description
P001	protein production line #1: soy meal processing, sterilizing, drying, filtering, and grinding with thermal oxidizer #1 and product recovery baghouse DC-3A
P002	protein production line #2: soy meal processing, sterilizing, drying, filtering, and grinding with thermal oxidizer #1 and product recovery baghouse DC-3B

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	The permittee shall employ a thermal oxidizer control system (TO #1) capable of achieving a 98% destruction efficiency for the reduction of volatile organic compounds (VOC).
b.	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

Final Permit-to-Install and Operate

Hamlet Protein Inc.

Permit Number: P0108108

Facility ID: 0332012022

Effective Date: 8/4/2011

c.	OAC rule 3745-17-07(A)	In accordance with OAC rule 3745-17-07(A)(1)(h), the visible particulate emission limitations specified in OAC rule 3745-17-07(A) are not applicable because OAC rule 3745-17-11 is not applicable to this emissions unit.
----	------------------------	--

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emission unit is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

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

The average combustion temperature within the thermal oxidizer shall be maintained at or above 1,450 degrees Fahrenheit at all times when the associated emissions unit is in operation.

The minimum temperature is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. Approved temperature revisions will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operation of the thermal oxidizer 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 average combustion temperature within the thermal oxidizer was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
 - c. each incident of deviation described in e)(3)a. or e)(3)b. where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(3)a. or e)(3)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in e)(3)a. or e)(3)b. 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.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
The thermal oxidizer shall be capable of achieving a 98% destruction efficiency for the reduction of VOC.

Applicable Compliance Method:

The destruction efficiency was based on the manufacturer’s design destruction efficiency.

For the purpose of federal enforceability, potential annual emissions can be determined using the following calculation for each production line:

80 lbs VOC ⁽¹⁾	2.85 tons ⁽²⁾	1-0.98 ⁽³⁾	8,760 hours ⁽⁴⁾	1 ton ⁽⁵⁾
ton	hour		year	2,000 lbs

Where:

- (1) Emission factor based on stack testing data from similar sources.
- (2) Maximum hourly production rate.
- (3) 98% destruction efficiency for reduction of VOC.
- (4) Maximum annual operating schedule.
- (5) Conversion factor.

If required, the permittee shall demonstrate compliance with the VOC destruction efficiency in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A. In addition, the capture efficiency to the thermal oxidizer can be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA’s “Guidelines for Determining Capture Efficiency,” dated January 9, 1995, if required. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- (2) The permittee shall conduct, or have conducted, emission testing for either:
 - a. P001 and P002 which are controlled by thermal oxidizer #1; OR
 - b. P003 and P004 which are controlled by thermal oxidizer #2.

Emission testing shall be conducted in accordance with the following requirements:

- c. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit, unless otherwise approved by the appropriate Ohio EPA District Office or local air agency.

- d. The emission testing shall be conducted to demonstrate compliance with the minimum 98% destruction efficiency for VOC from the thermal oxidizer.

40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A shall be employed to demonstrate compliance with the minimum destruction efficiency. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. 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).
- g. 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.
- h. 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.

g) **Miscellaneous Requirements**

- (1) None.

4. Emissions Unit Group -Thermal Oxidizer #2: P003 & P004

EU ID	Operations, Property and/or Equipment Description
P003	protein production line #3: soy meal processing, sterilizing, drying, filtering, and grinding with thermal oxidizer #2 and product recovery baghouse DC-3C
P004	protein production line #4: soy meal processing, sterilizing, drying, filtering, and grinding with thermal oxidizer #2 and product recovery baghouse DC-3D

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	The permittee shall employ a thermal oxidizer control system (TO #2) capable of achieving a 98% destruction efficiency for the reduction of volatile organic compounds (VOC).
b.	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

Final Permit-to-Install and Operate

Hamlet Protein Inc.

Permit Number: P0108108

Facility ID: 0332012022

Effective Date: 8/4/2011

c.	OAC rule 3745-17-07(A)	In accordance with OAC rule 3745-17-07(A)(1)(h), the visible particulate emission limitations specified in OAC rule 3745-17-07(A) are not applicable because OAC rule 3745-17-11 is not applicable to this emissions unit.
----	------------------------	--

(1) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emission unit is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

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

The average combustion temperature within the thermal oxidizer shall be maintained at or above 1,450 degrees Fahrenheit at all times when the associated emissions unit is in operation.

The minimum temperature is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. Approved temperature revisions will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operation of the thermal oxidizer 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 average combustion temperature within the thermal oxidizer was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
 - c. each incident of deviation described in e)(3)a. or e)(3)b. where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(3)a. or e)(3)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in e)(3)a. or e)(3)b. 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.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
The thermal oxidizer shall be capable of achieving a 98% destruction efficiency for the reduction of OC.

Applicable Compliance Method:

The destruction efficiency was based on the manufacturer's design control efficiency.

For the purpose of federal enforceability, potential annual emissions can be determined using the following calculation for each production line:

80 lbs VOC ⁽¹⁾	2.85 tons ⁽²⁾	1-0.98 ⁽³⁾	8,760 hours ⁽⁴⁾	1 ton ⁽⁵⁾
ton	hour		year	2,000 lbs

Where:

- (1) Emission factor based on stack testing data from similar sources.
- (2) Maximum hourly production rate.
- (3) 98% destruction efficiency for reduction of VOC.
- (4) Maximum annual operating schedule.
- (5) Conversion factor.

If required, the permittee shall demonstrate compliance with the VOC destruction efficiency in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A. In addition, the capture efficiency to the thermal oxidizer can be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995, if required. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- (2) The permittee shall conduct, or have conducted, emission testing for either:
 - a. P001 and P002 which are controlled by thermal oxidizer #1; OR
 - b. P003 and P004 which are controlled by thermal oxidizer #2.

Emission testing shall be conducted in accordance with the following requirements:

- c. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit, unless otherwise approved by the appropriate Ohio EPA District Office or local air agency.
- d. The emission testing shall be conducted to demonstrate compliance with the minimum 98% destruction efficiency for VOC from the thermal oxidizer.

40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A shall be employed to demonstrate compliance with the minimum destruction efficiency. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. 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).
- g. 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.
- h. 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.

g) Miscellaneous Requirements

- (1) None.