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Facility Name: **Doane Products**

Application Number: **01-7310**

Date: **September 10, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule

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3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Doane Products** located in **Fayette** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
P001	14 MM BTU Dryer (D012)
B001	
P002	14 MM BTU Dryer (D008)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
12 MM BTU Boiler (D011)				3745-31-05
	<u>BAT Determination</u>		<u>Applicable Federal & OAC Rules</u>	
	Compliance with permitted limits and applicable rules. The BAT emission limits are more stringent than the rule.	Compliance with permitted limits and applicable rules and NSPS subpart Dc. The BAT emission limits are more stringent than the rule.	3745-31-05	3745-17-10 (B) (1) 3745-17-07
			3745-17-10 (B) (1)	40 CFR Part 60 Subpart Dc
			3745-17-07	
			3745-31-05	
	Compliance with permitted limits and applicable rules. The BAT emission limits are more stringent than the rule.		3745-17-10 (B) (1)	
			3745-17-07	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	opacity as six minute average	0.246 Lbs PM/Hr 0.921 PM/TPY		
Permit Allowable Mass Emissions and/or Control/Usage Requirements	0.154 Lbs OC/Hr. 0.577 OC TPY 1.176 Lbs CO/Hr. 4.403 CO TPY 0.008 Lbs SO ₂ /Hr. 0.031 SO ₂ TPY 1.4 Lbs NO _x /Hr. 5.24 NO _x TPY 0.577 OC TPY 0.28 Lbs PM/Hr. 1.176 Lbs PM TPY CO/Hr. 4.403 CO TPY 20% opacity as six minute average 0.008 Lbs SO ₂ /Hr. 0.031 SO ₂ TPY 0.135 Lbs oc/Hr. 1.4 Lbs NO _x /Hr. 0.507 OC TPY 5.24 Lbs NO _x TPY 1.033 Lbs CO/Hr. 0.28 Lbs 3.868 CO TPY 0.007 Lbs SO ₂ /Hr 1.05 PM TPY 0.028 SO ₂ TPY 1.23 Lbs NO _x /Hr 4.61 NO _x TPY	20% opacity as six minute average		

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SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	1.661
CO	12.674
SO ₂	0.09
NO _x	15.09
PM	3.021

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B001	Boiler	DC

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

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Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Ohio EPA Central District Office**
3232 Alum Creek Drive
Columbus, Ohio 43207-3417

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

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Except as provided by OAC Rule 3745-15-06(A) (3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. OPERATIONAL RESTRICTIONS

1. Emissions units B001, P001, and P002 shall not operate more than 7488 hours a year.
2. Emissions units B001, P001, and P002 shall not burn fuels other than natural gas.

B. MONITORING AND/OR RECORDKEEPING REQUIREMENTS

The permittee shall collect and record the following information:

1. for emissions units P001, P002, and B001 the owner or operator shall record and maintain records of the amount of fuel combusted daily; and,
2. all records shall be maintained at the facility for at least five years.

C. COMPLIANCE DETERMINATION

1. Compliance with the emissions limitation(s) contained in this permit shall be determined in accordance with the following methods:

- a. Emissions Limitation

0.02 Pound particulate emissions/MMBTU actual heat imputed for B001 and P002.

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Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.012 MMCF/Hour B001 0.014 MMCF P001 and P002) by the AP 42 (Chapter 1.4, revised 3/98) emission factor for natural gas (7.6 Lbs. PM/MMCF) and dividing by the maximum hourly heat imputed capacity of the emissions unit (12.3 MMBTU/Hr for B001 and 14 MMBTU/Hr P001 and P002).

b. Emission Limitation:

P001 and P002

0.008 Pound sulfur dioxide/hour

0.031 TPY sulfur dioxide

B001

0.007 Pound sulfur dioxide/hour

0.028 TPY sulfur dioxide

Applicable Compliance Method:

Compliance with the emission limitation shall be calculated by converting the hourly MMBTU requirement to MMCF and then multiplying this value by the emission by the emission factor for sulfur dioxide from AP-42 (Chapter 1.4, revised 3/98).

c. Emission Limitation:

P001 and P002

1.46 pounds Nitrogen oxide/hour

5.24 TPY Nitrogen oxide

B001

1.23 pound Nitrogen oxide/hour

4.61 TPY Nitrogen oxide

Applicable Compliance Method:

Compliance with the emission limitation shall be calculated by converting the hourly MMBTU requirement to MMCF and then

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multiplying this value by the emission by the emission factor for nitrogen oxide from AP-42 1.4 (Chapter 1.4, revised 3/98).

d. Emission Limitation:

P001 and P002

0.0154 Pound organic compound/hour

0.577 TPY organic compound

B001

0.135 Pound organic compound/hour

0.507 TPY organic compound

Applicable Compliance Method:

Compliance with the emission limitation shall be calculated by converting the hourly MMBTU requirement to MMCF and then multiplying this value by the emission by the emission factor for organic compounds from AP-42 (Chapter 1.4, revised 3/98).

e. Emission Limitation:

P001 and P002

1.176 Pounds/hour carbon monoxide

4.403 TPY carbon monoxide

B001

1.033 Carbon monoxide pounds/hour

3.868 TPY carbon monoxide

Applicable Compliance Method:

Compliance with the emission limitation shall be calculated by converting the hourly MMBTU requirement to MMCF and then multiplying this value by the emission by the emission factor for carbon monoxide from AP-42 1.4 (Chapter 1.4, revised 3/98).

f. Emission Limitation:

20 Percent opacity as a six minute average, except as provided by rule.

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Applicable Compliance Method:

Compliance with the emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 6, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B) (1).