



Environmental
Protection Agency

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

5/16/2012

Mark Miller
Sensory Effects Powder Systems
24 N CLINTON ST
DEFIANCE, OH 43512

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0320010118
Permit Number: P0109976
Permit Type: Renewal
County: Defiance

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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	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
Sensory Effects Powder Systems**

Facility ID:	0320010118
Permit Number:	P0109976
Permit Type:	Renewal
Issued:	5/16/2012
Effective:	5/16/2012
Expiration:	5/16/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
Sensory Effects Powder Systems

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Authorization

Facility ID: 0320010118
Application Number(s): A0044420
Permit Number: P0109976
Permit Description: Renewal PTIO for Coulter I Dryer (P004), DJ Coulter Dryer (P007) and five 7.5 mmBTU/hr natural gas, #4 and/or #6 fuel oil-fired boilers (B002-B006).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 5/16/2012
Effective Date: 5/16/2012
Expiration Date: 5/16/2017
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Sensory Effects Powder Systems
24 N CLINTON ST
Defiance, OH 43512

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: P0109976

Permit Description: Renewal PTIO for Coulter I Dryer (P004), DJ Coulter Dryer (P007) and five 7.5 mmBTU/hr natural gas, #4 and/or #6 fuel oil-fired boilers (B002-B006).

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

Emissions Unit ID:	P004
Company Equipment ID:	Wet scrubber
Superseded Permit Number:	03-09789
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P007
Company Equipment ID:	DJ
Superseded Permit Number:	03-09789
General Permit Category and Type:	Not Applicable

Group Name: 7.5 mmBTU/hr Boiler

Emissions Unit ID:	B002
Company Equipment ID:	002
Superseded Permit Number:	03-09789
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B003
Company Equipment ID:	003
Superseded Permit Number:	03-09789
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B004
Company Equipment ID:	004
Superseded Permit Number:	03-09789
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B005
Company Equipment ID:	005
Superseded Permit Number:	03-09789
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B006
Company Equipment ID:	006
Superseded Permit Number:	03-09789
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

Sensory Effects Powder Systems

Permit Number: P0109976

Facility ID: 0320010118

Effective Date: 5/16/2012

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.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

C. Emissions Unit Terms and Conditions

1. P004, Coulter I Dryer with Wet Scrubber

Operations, Property and/or Equipment Description:

Non-dairy food product dryer, Coulter I Dryer

- 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.	OAC rule 3745-31-05(A)(3)	2.70 lbs particulate emissions (PE)/hr; 11.83 tons PE/yr 1.32 lbs nitrogen oxides (NOx)/hr; 5.78 tons NOx/yr 0.07 lb organic compounds (OC)/hr; 0.31 ton OC/yr 1.11 lbs carbon monoxide (CO)/hr; 4.86 tons CO/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements for this emissions unit have been determined to be the use of a wet scrubber and compliance with the terms and conditions of this permit.
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall be between 0.2 to 3 inches of water.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 200 gallons per minute.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's flow rate on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

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

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

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

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
 - 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 scrubber;

- c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in “a” or “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.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- 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:
2.70 lbs PE/hr; 11.83 tons PE/yr
Applicable Compliance Method:
The hourly PE emission limitation was developed by taking the maximum uncontrolled mass emissions rate of 270 lbs/hr and applying a 99 percent control efficiency for the use of a packed bed scrubber.
If required, compliance with the hourly emission limitation shall be determined by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.
The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.
 - b. Emission Limitation:
1.32 lbsNOx/hr; 5.78 tons NOx/yr
Applicable Compliance Method:
The hourly emission limitation was established by multiplying the emission factor from AP-42, “Compilation of Air Pollutant Emission Factors”, 5th edition, section 1.4 (revised 7/98) of 100 pounds per million standard cubic feet (mmscf) of

natural gas fired by the maximum hourly heat input of 13.5 mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

If required, the permittee shall demonstrate compliance with this emission limitation through emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

0.07 lb OC/hr; 0.31 ton OC/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (revised 7/98) of 5.5 pounds per million standard cubic feet (mmscf) of natural gas fired by the maximum hourly heat input of 13.5 mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

If required, compliance with the hourly emission limitation shall be determined by testing in accordance with Methods 1-4 and 18, 25 or 25A of 40, CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:

1.11 lbs CO/hr; 4.86 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (revised 7/98) of 84 pounds per million standard cubic feet (mmscf) of natural gas fired by the maximum hourly heat input of 13.5 mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

If required, the permittee shall demonstrate compliance with this emission limitation through emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

e. Emission Limitation:

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

Applicable Compliance Method:

If required compliance with the visible PE limitation shall be demonstrated in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

2. P007, DJ Dryer with Cyclones

Operations, Property and/or Equipment Description:

Non-dairy food products dryer, D.J. dryer

- 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.	OAC rule 3745-31-05(A)(3)	1.24 lbs particulate emissions (PE)/hr; 5.43 tons PE/yr 1.08 lb nitrogen oxides (NOx)/hr; 4.73 tons NOx/yr 0.06 lb organic compounds (OC)/hr; 0.26 ton OC/yr 0.91 lb carbon monoxide (CO)/hr; 4.0 tons CO/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements have been determined to be the use of three high efficiency cyclones and compliance with the terms and conditions of this permit.
- b. The emission limitation specified this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

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.

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

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 from the stack serving this emissions unit; 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 are 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.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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:

1.24 lbs PE/hr; 5.43 tons PE/yr

Applicable Compliance Method:

The hourly PE emission limitation was developed by taking the maximum uncontrolled mass emissions rate of 62 lbs/hr and applying a 98% control efficiency for the use of a three high efficiency cyclones.

If required, compliance with the hourly emission limitation shall be determined by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate the actual PE emission rates for this emissions unit utilizing the method specified above.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

1.08 lbsNOx/hr; 4.73 tons NOx/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (revised 7/98) of 100 pounds per million standard cubic feet (mmscf) of natural gas fired by the maximum hourly heat input of 11mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

If required, the permittee shall demonstrate compliance with this emission limitation through emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

0.06 lb OC/hr; 0.26 ton OC/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (revised 7/98) of 5.5 pounds per million standard cubic feet (mmscf) of natural gas fired by the maximum hourly heat input of 11 mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

If required, compliance with the hourly emission limitation shall be determined by testing in accordance with Methods 1-4 and 18, 25 or 25A of 40, CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:

0.91 lb CO/hr; 4.0 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (revised 7/98) of 84 pounds per million standard cubic feet (mmscf) of natural gas fired by the maximum hourly heat input of 11 mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

If required, the permittee shall demonstrate compliance with this emission limitation through emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

e. Emission Limitation:

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

Applicable Compliance Method:

If required compliance with the visible PE limitation shall be demonstrated in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -7.5 mmBTU/hr Boiler: B002,B003,B004,B005,B006,

EU ID	Operations, Property and/or Equipment Description
B002	7.5 MM BTU/hr NG/No. 4 or No. 6 oil fired boiler, Boiler No. 1
B003	7.5 MM BTU/hr NG/No. 4 or No. 6 oil fired boiler, Boiler No. 2
B004	7.5 MM BTU/hr NG/No. 4 or No. 6 oil fired boiler, Boiler No. 3
B005	7.5 MM BTU/hr NG/No. 4 or No. 6 oil fired boiler, Boiler No. 4
B006	7.5 MM BTU/hr NG/No. 4 or No. 6 oil fired boiler, Boiler No. 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. None.

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

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

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(A)(3)	<u>From each emissions unit individually:</u> 1.01 lbs particulate emissions (PE)/hr; 4.42 tons PE/yr 2.95 lbs nitrogen oxides (NOx)/hr; 12.92 tons NOx/yr 0.06 lb organic compounds (OC)/hr; 0.26 tons OC/yr 0.62 lb carbon monoxide (CO)/hr; 2.72 tons CO/yr

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		2.17 pounds sulfur dioxide (SO ₂) per million British thermal units (mmBtu) of actual heat input Visible PE shall not exceed 20% opacity, as a six minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D)	<u>When burning #4 or #6 Oil, emissions units B002 through B006, combined, shall not exceed the following:</u> 23 tons SO ₂ , per rolling 12-month period. See b)(2)c.
c.	OAC rule 3745-17-10(C)	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-18-06(D)	See b)(2)e.

(2) Additional Terms and Conditions

- a. The hourly and annual PE, NO_x, CO, and OC emission limitation were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.

When firing natural gas, compliance with the SO₂ emission limitations shall be assumed based on the negligible percent sulfur, by weight, in the fuel. The maximum SO₂ potential to emit for each emissions unit individually when firing natural gas is 0.02 tons per year based on the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (revised 7/98) of 0.6 pounds per million standard cubic feet (mmscf) of natural gas fired by the maximum hourly heat input of 7.5 mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- c. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V regulations:
- i. 23 tons SO₂ per rolling, 12-month period when burning fuel oil for emissions units B002 through B006, combined, based upon the fuel oil operational restriction [See c)(1)].

- d. The emission limitation specified by this rule is less stringent than the emission limitation established in OAC rule 3745-31-05(A)(3).
- e. These emissions units are exempt from the requirements of OAC rule 3745-18-06(D) pursuant to OAC rule 3745-18-06(B).
- f. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as-received" basis:
 - i. a sulfur content less than 1.7% by weight; and
 - ii. greater than 140,596 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

c) **Operational Restrictions**

- (1) The maximum annual fuel oil usage for emissions units B002 through B006, combined, shall not exceed 150,000 gallons, based upon a rolling, 12-month summation of fuel oil usage.

These emissions units have 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 fuel oil usage, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBTU). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with Method 19 of 40 CFR, Part 60, Appendix A, or the appropriate ASTM methods (such as ASTM methods D240 and D4292), or equivalent methods as approved by the director.

- (2) The permittee shall maintain monthly records of the following information for emissions units B002-B006, combined:
 - a. the #4 or #6 oil usage for each month, in gallons; and
 - b. the rolling, 12-month summation of their combined usage rates, in gallons.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 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. the rolling, 12-month usage rate limitation of 150,000 gallons of #4 and/or #6 fuel oil;
 - 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) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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:
1.01 lbs PE/hr; 4.42 tons PE/yr

Applicable Compliance Method:

The worst case fuel for this pollutant is #6 fuel oil and the emission limitation was established based on the emission factor for that fuel. The hourly emission limitation was developed by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.3 (revised 5/10) of 18.84 lbs/1000 gallon of fuel oil* by the maximum hourly heat input of 7.5 mmBtu per hour, and dividing by a heating value of 0.14 mmBtu/gal.

If required, the permittee shall demonstrate compliance with this emission limitation through emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

*18.84 lbs/1000 gallons = 9.19(S) + 3.22 where (S) = the sulfur content. The average sulfur content used is 1.7%

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

2.95 lbsNOx/hr; 12.92 tons NOx/yr

Applicable Compliance Method:

The worst case fuel for this pollutant is #6 fuel oil and the emission limitation was established based on the emission factor for that fuel. The hourly emission limitation was developed by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.3 (revised 5/10) of 55 lbs/1000 gallons of #6 oil by the maximum hourly heat input of 7.5 mmBTU/hr and dividing by the heating value of 0.14 mmBTU/gallon.

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by testing in accordance with Methods 1-4 and 7 of 40, CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

0.06 lb OC/hr; 0.26 ton OC/yr

Applicable Compliance Method:

The worst case fuel for this pollutant is #6 fuel oil and the emission limitation was established based on the emission factor for that fuel. The hourly emission limitation was developed by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.3 (revised 5/10) of 1.13 lbs/1000 gallons of #6 oil by the maximum hourly heat input of 7.5 mmBTU/hr and dividing by the heating value of 0.14 mmBTU/gallon.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation by testing in accordance with Methods 1-4 and 18, 25 or 25A of 40, CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:

0.62 lb CO/hr; 2.72 tons CO/yr

Applicable Compliance Method:

The worst case fuel for this pollutant is natural gas and the emission limitation was established based on the emission factor for that fuel. The hourly emission limitation was established by multiplying the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (revised 7/98) of 84 pounds per million standard cubic feet (mmscf) of natural gas fired by the maximum hourly heat input of 7.5 mmBtu per hour, and dividing by a heating value of 1020 mmBtu/mmscf.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation by testing in accordance with Methods 1-4 and 10 of 40, CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

e. Emission Limitation:

2.17 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When burning #4 or #6 oil, compliance with the SO₂ emission limitation above shall be demonstrated based on the record keeping requirements in d)(1) of this permit, and the use of the equation contained in OAC rule 3745-18-04(F)(2) to calculate the actual SO₂ emission rate for each oil shipment received during the calendar month.

When firing natural gas, compliance shall be assumed based on the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

f. Emission Limitation:

23 tons SO₂ per rolling 12-month period

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the annual fuel oil restriction of 150,000 gallons, a heating value of 0.14 mmBtu/gallon, the emission limitation of 2.17 lbs SO₂ per mmBtu of actual heat input, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual fuel oil restriction and the fuel oil quality restriction, compliance with the SO₂ emission limitation also be demonstrated.

g. Emission Limitation:

Visible PE shall not exceed 20% opacity, except as provided by rule

Applicable Compliance Method:

If required compliance with the visible PE limitation shall be demonstrated in accordance with Method 9, of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.