



Environmental Protection Agency

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

7/6/2012

Paul Jagdeo
RALSTON FOODS
3775 Lancaster-New Lexington Rd
LANCASTER, OH 43130

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0123010180
Permit Number: P0110352
Permit Type: Initial Installation
County: Fairfield

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Lancaster Eagle Gazette. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-CDO; Kentucky

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)



Permit Strategy Write-Up

1. Check all that apply:

Netting Determination

New Installation

2. Source Description:

The applicant, Ralston Foods, is a manufacturer of cooked cereals. The facility is located at the following address:

276 Bremen Road
Lancaster, Ohio 43130

Ralston Foods was issued a synthetic minor permit on March 10, 2011 for cereal food dryers B015, B016, B017, P011, P012, and P016. The annual emissions from these emissions units were limited to 60 tons VOC per year. Additionally, Ralston Foods installed a new dryer (B018) under permit (P0105110). Potential emissions from B018 were permitted at 23.1 tons VOC per year without permit restrictions. Administrative Modification to Permit No. P0108236, issued 9/22/2011 to reflect corrected particulate emissions for P011, which includes the flash dryers, coating drums, steam dryer and extruder. This action resulted in no changes to FEPTIO status and limitations. The current permit action is for the replacement of System 4 dryer/cooler (B015) with a like unit (B019). This action will result in no changes to FEPTIO status and limitations.

3. Facility Emissions and Attainment Status:

Ralston Foods is classified as a Major Stationary Source pursuant to Title V operating permit requirements for volatile organic compound (VOC). Potential emissions solely from the use of VOC-containing liquid flavor cereal additives exceed the Title V operating permit threshold levels. Potential emissions, without the requested synthetic minor restrictions, are 142.3 tons of VOC per year. With the requested synthetic minor restrictions the emissions of volatile organic compounds from emissions units B015, B016, B017, B018, B019, P011, P012, and P016 is limited to 83.1 tons of per year.

Ralston Foods is located in Fairfield County which is currently attainment for all criteria air pollutants excluding PM2.5.

4. Source Emissions:

Yearly potential emissions of volatile organic compounds from the use of VOC-containing liquid flavor cereal additives in emissions units is B015, B016, B017, B018, B019, P011, P012, and P016 is 142.3 tons of per year.

Limiting the maximum yearly VOC-containing liquid flavor cereal additives rate to 700,000 pounds per year will reduce volatile organic compound potential emissions of 142.3 tons per year by 59.2 tons per year. Therefore, potential emissions of 142.3 tons per year are reduced to 83.1 tons ($142.3 - 59.2 = 83.1$).



Emissions of volatile organic compounds is based upon the annual VOC-containing liquid flavor cereal additives rate of 700,000 pound per year multiplied by VOC content of each flavoring used (23.75%) multiplied by one ton per 2000 pounds.

(700,000 lbs VOC containing flavorings/year) x (.2375 % VOC content of flavorings) x (1 ton / 2000 lbs) = 83.1 tons VOC per Year.

5. Conclusion:

Ralston Foods will become a synthetic minor facility by means of limiting the maximum yearly VOC-containing liquid flavor cereal additives rate to 700,000 pounds per year, as based upon a rolling, 12-month summation of the production rates.

The volatile organic compound emissions of 142.3 tons per year are reduced to 83.1 tons per year through this permit.

The synthetic minor will effectively restrict volatile organic compound emissions below the Title V thresholds. The operational restrictions, record keeping, reporting will ensure that compliance with this permit is achieved and maintained.

6. Please provide additional notes or comments as necessary:

This permit action is for the replacement of B015 with a like unit, B019. Emission rates are not affected.

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

Table with 2 columns: Pollutant, Tons Per Year. Rows: VOC (83.1), OC (7.3)

PUBLIC NOTICE

7/6/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

RALSTON FOODS
276 BREMEN RD,
LANCASTER, OH 43130

Fairfield County

FACILITY DESC.: Breakfast Cereal Manufacturing

PERMIT #: P0110352

PERMIT TYPE: Initial Installation

PERMIT DESC: Replacement of System 4 dryer/cooler (B015) with a like unit (B019).

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kelly Saavedra, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
RALSTON FOODS**

Facility ID:	0123010180
Permit Number:	P0110352
Permit Type:	Initial Installation
Issued:	7/6/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
RALSTON FOODS

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. B019, Dryer#4 (B015 Replacement) 11



Authorization

Facility ID: 0123010180
 Application Number(s): A0043837
 Permit Number: P0110352
 Permit Description: Replacement of System 4 dryer/cooler (B015) with a like unit (B019).
 Permit Type: Initial Installation
 Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*
 Issue Date: 7/6/2012
 Effective Date: To be entered upon final issuance
 Expiration Date: To be entered upon final issuance
 Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

RALSTON FOODS
 276 BREMEN RD
 LANCASTER, OH 43130

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, Central District Office
 50 West Town Street, 6th Floor
 P.O. Box 1049
 Columbus, OH 43216-1049
 (614)728-3778

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: P0110352

Permit Description: Replacement of System 4 dryer/cooler (B015) with a like unit (B019).

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

Emissions Unit ID:	B019
Company Equipment ID:	Dryer#4 (B015 Replacement)
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, Central 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

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. B019, Dryer#4 (B015 Replacement)

Operations, Property and/or Equipment Description:

System 4, coating, dryer and cooler

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

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

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 rule 3704.03(T)	Emissions shall not exceed: 45.45 pounds per hour of volatile organic compounds (VOC) from VOC-containing liquid cereal additives. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3) as effective 11/30/2001	Emissions shall not exceed: 0.46 pound per hour and 2.00 tons per year of particulate emissions (PE). See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	VOC emissions from liquid flavor cereal additives in emissions units B015, B016, B017, B018, B019, P011, P012, and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P016, combined, shall not exceed, as a rolling 12-month summation, 83.1 tons per year. See b)(2)c. and b)(2)d. below.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stacks serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(1)	PE from the stack serving B019 shall not exceed 6.1 lbs/hr based on the Table I which is more stringent than the allowable PE rate from Figure II.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE) from these air contaminant sources since the uncontrolled potential to emit for particulate emissions is less than 10 tons/year.
- c. The maximum annual VOC-containing liquid flavor cereal additives rate for the emissions units B015, B016, B017, B018, B019, P011, P012, and P016 shall not exceed 700,000 pounds per year, based upon a rolling, 12-month summation of the additive rates.
- d. Liquid flavor cereal additive applied in the cereal operations shall not exceed 23.75% pounds of VOC per gallon of liquid flavor cereal additive, excluding water and exempt solvents, as a daily volume-weighted average.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall collect and record the following information each day for emissions units B015, B016, B017, B018, B019, P011, P012, and P016:
 - a. the name and identification number of each liquid flavor cereal additive applied;
 - b. the volume, in gallons, of each liquid flavor cereal additive applied;
 - c. the hours of operation of each emissions unit;
 - d. the VOC content for each flavoring material in pounds of VOC per gallon of liquid flavor cereal additive, excluding water, as applied;
 - e. the total volume, in gallons, of all of the liquid flavor cereal additive applied; and
 - f. total daily emissions, for each emissions unit, in pounds per day ($c \times d \times e$).
- (3) The permittee shall collect and record the following information each month for emissions units B015, B016, B017, B018, B019, P011, P012, and P016:
 - a. the name and identification of each liquid flavor cereal additive, as applied;
 - b. the VOC content for each flavoring material in pounds of VOC per gallon of liquid flavor cereal additive, excluding water, as applied;
 - c. the number of gallons applied, of each liquid flavor cereal additive, excluding water, as applied;
 - d. the total VOC emissions rate for all liquid flavor cereal additive, in pounds per month ($b \times c$);
 - e. for the first 12 calendar months following the initial startup of this emissions unit, the cumulative additive rate is calculated by adding the current month's additive rate to the additive rate for the preceding months since the startup of the emissions unit;
 - f. the total VOC emissions rate for all liquid flavor cereal additive, in pounds per cumulative, 12-month summation ($b \times d$); and
 - g. beginning after the first 12 calendar months following the startup of the emissions unit, the rolling, 12 month summation of the total additive rate is calculated by adding the current month's additive rate to the additive rate for the preceding eleven calendar months;
 - h. The total VOC emissions rate for all liquid flavor cereal additive, in pounds per cumulative, 12-month summation ($b \times d$); and

- i. the total VOC emissions rate for all liquid flavor cereal additive, in tons per rolling, 12-month summation (f x 1 ton / 2000 pounds).
- (4) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:
- a. the name and identification number of each liquid flavor cereal additive, as applied;
 - b. the mass of VOC per volume of liquid flavor cereal additive (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each liquid flavor cereal additive, as applied; and
 - c. the daily volume-weighted average VOC content of all liquid flavor cereal additives, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi})}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all liquid flavor cereal additives, as applied.

$C_{VOC,2i}$ is the VOC content in pounds of VOC per gallon of liquid flavor cereal additives, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

D_C = density of liquid flavor cereal additives, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = the volume fraction of solids in liquid flavor cereal additive, in gallons of solids per gallon of liquid flavor cereal additive.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in liquid flavor cereal additive, in pound of volatile matter per pound of liquid flavor cereal additive.

W_W = weight fraction of water in liquid flavor cereal additive, in pound of water per pound of liquid flavor cereal additive.

W_{ES} = weight fraction of exempt solvent in liquid flavor cereal additive, in pound of exempt solvent per pound of liquid flavor cereal additive.

V_{VM} = volume fraction of volatile matter in liquid flavor cereal additive, in gallon of volatile matter per gallon of liquid flavor cereal additive.

V_W = volume fraction of water in liquid flavor cereal additive, in gallon of water per gallon of liquid flavor cereal additive.

V_{ES} = volume fraction of exempt solvent in liquid flavor cereal additive, in gallon of exempt solvent per gallon of liquid flavor cereal additive.

A = subscript denoting that the indicated VOC content is a weighted average of the liquid flavor cereal additives employed during time period "t".

L_C = liquid volume of cereal flavoring employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of liquid flavor cereal additive.

i = subscript denoting a specific liquid flavor cereal additive employed during time period "t".

n = total number of liquid flavor cereal additives employed during time period "t".

t = time period specified for the weighted average VOC content is per day and not included in the calculation.

- (5) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
- a. the number of gallons of liquid flavor cereal additive applied during the month;
 - b. the maximum daily volume-weighted average VOC content calculated for $(C_{VOC,2})_A$ during the month;
 - c. the total VOC emissions from all liquid flavor cereal additives applied during the month, i.e., the product of the "a" times "b";
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of "e" times "f" for all cleanup materials employed; and
 - h. the total VOC emissions from all liquid flavor cereal additives and cleanup materials employed, in pounds or tons, the sum of "c" and "g".

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions units.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions 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. VOC emissions from liquid flavor cereal additives in emissions units B015, B016, B017, B018, B019, P011, P012, and P016, combined, shall not exceed, as a rolling 12-month summation, 83.1 tons per year.
 - ii. The maximum annual VOC-containing liquid flavor cereal additives rate for this emissions unit shall not exceed 700,000 pounds per year, based upon a rolling, 12-month summation of the additive rates.
 - 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 Ohio EPA, Central District Office.

- (3) The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations 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:

45.45 pounds per hour of volatile organic compounds (VOC) from VOC-containing liquid cereal additives

Applicable Compliance Method:

Compliance with the short term limitation of 45.43 pounds per hour shall be demonstrated by multiplying hourly cereal flavor usage of 64.9 lbs/hr by the maximum VOC content of the liquid cereal flavoring of 70.0%.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 18, 25 or 25A.

b. Emission Limitation:

VOC emissions from liquid flavor cereal additives in emissions units B015, B016, B017, B018, B019, P011, P012, and P016, combined, shall not exceed, as a rolling 12-month summation, 83.1 tons per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d(3) of this permit.

Emissions of volatile organic compounds is based upon the annual VOC-containing liquid flavor cereal additives rate of 700,000 pound per year multiplied by VOC content of each flavoring used (23.75%) multiplied by one ton per 2000 pounds.

$(700,000 \text{ lbs VOC containing flavorings/year}) \times (.2375 \% \text{ VOC content of flavorings in lbs/gallon}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 83.1 \text{ Tons VOC / Year.}$

c. Emission Limitation:

Visible particulate emissions from the stacks serving these emissions units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



d. Emission Limitation:

0.46 lb/hr and 2.00 TPY of particulate emissions (PE)

Applicable Compliance Method:

PE from drying and cooling

$$(1.80 \text{ tons of product / hr}) \times (0.197 \text{ lb PE/ton of product drying}) = 0.36 \text{ lb PE/hr}$$

$$(1.80 \text{ tons of product / hr}) \times (0.054 \text{ lb PE/ton of product cooling}) = 0.097 \text{ lb PE/hr}$$

Total PE

$$(0.36 \text{ lb PE/hr}) + (0.097 \text{ lb PE/hr}) = 0.46 \text{ lb PE/hr}$$

The annual limit is based upon the hourly emissions limitation times the maximum operating schedule of 8,760 hours per year, divided by 2,000 lbs per ton.

$$(0.46 \text{ lb PE /hr}) \times (8760 \text{ hr/yr}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 2.00 \text{ TPY}$$

Compliance with the annual limitation for emissions units B015, B016, B017, B018, B019, P011, P012, and P016 shall be assumed as long as compliance with the hourly limitation for each is maintained.

Emission factors 0.197 lb PE / ton of product drying and 0.054 lb PE/ ton of product cooling are obtained from the permit to install application. Specifically, the emissions factors were derived from a February, 1996 stack test data for cereal dryers located at the Ralston Pet Foods facility in Clinton, Iowa.

No testing is specifically required to demonstrate compliance with these emission limitations but, if required, the permittee shall demonstrate compliance with these emissions limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

e. Emission Limitation:

PE from the stacks serving this emissions units, as regulated by OAC rule 3745-17-11(B)(1), shall not exceed 6.1 lbs/hr.

Applicable Compliance Method:

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.



P = 1.80 tons/hr

E = 6.1 lbs/hr

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

g) Miscellaneous Requirements

(1) None.