



Environmental Protection Agency

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

10/30/2012

Gary Sluss
AdvancePierre Foods
9990 Princeton-Glendale Rd.
Cincinnati, OH 45246

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

Facility ID: 1409000687
Permit Number: P0110240
Permit Type: Administrative Modification
County: Butler

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, Journal News. 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 Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
SWOAQA; Indiana; Kentucky

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	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:

Synthetic Minor Determination

Netting Determination

2. Source Description:

AdvancePierre Foods is a meat product cooking and packaging facility. Various meat products are steam cooked or fried, then frozen, and packaged for distribution. There are 10 cook lines at the facility (P001 – P010).

This Federally Enforceable Permit to Install and Operate (FEPTIO) (P0110240) is an administrative modification for emissions unit P001 (Cook Line 1 – Fry/Fry) for the purpose of setting a Synthetic Minor emissions limitation for greenhouse gas (GHG) emissions in the form of an emissions limitation on carbon dioxide equivalent (CO₂e) emissions. It was determined that AdvancePierre Foods has the potential to emit of greater than 100,000 TPY CO₂e. Having a potential to emit of greater than 100,000 TPY CO₂e required the facility to apply for a Title V operating permit by July 1, 2012 in following the requirements of Step 2 of the GHG Tailoring Rule. The facility applied for a Synthetic Minor CO₂e emissions restriction on June 5, 2012. The facility also submitted a protective Title V operating permit application on 6/29/2012. Ohio EPA will not act on the Title V operating permit, and will instead process the Synthetic Minor request. This permitting action will set a restriction on CO₂e emissions and a restriction on facility-wide natural gas usage.

Although this is a new requirement for the facility, this does not qualify for a Chapter 31 modification since the CO₂e emissions have always been present. There have been no physical changes in the emissions units and no new pollutant is being emitted. Therefore, this qualifies as a facility requested administrative modification.

FEPTIO P0110240 will supersede FEPTIO 14-06026, issued 5/28/2010, for emissions unit P001 and the facility-wide limitations.

3. Facility Emissions and Attainment Status:

AdvancePierre Foods is located in Butler County, Ohio, which is currently non-attainment for ozone and attainment for all other criteria pollutants. AdvancePierre Foods is a Synthetic Minor facility for emissions of PM and VOC based on its unrestricted potential to emit PM and VOC being greater than 100 TPY. The facility has accepted emissions limitations and production restrictions to set allowable emissions of PM and VOC from all units facility-wide, combined, at 85.2 TPY PM and 96.3 TPY VOC in order to avoid Title V applicability.

On May 13, 2012, US EPA issued the GHG Tailoring Rule which established Title V applicability, during Step 2, for any facility as having a facility-wide potential to emit of equal to or greater than 100,000 TPY CO₂e emissions and equal to or greater than 100 TPY GHG emissions on a mass basis. The rule required such facilities to submit a Title V operating permit application by July 1, 2012. AdvancePierre Foods determined that their facility-wide potential to emit for CO₂e is 175,551.17 TPY. The facility-wide potential to emit for GHG emissions on a mass basis is 175,334.44 TPY. AdvancePierre Foods



submitted a request to limit the facility-wide CO₂e emissions to 99,500 TPY. This permitting action grants this request. The facility has also accepted a facility-wide federally enforceable restriction on natural gas usage of 698.57 million cubic feet per year. These restrictions have been accepted in order to avoid Title V applicability.

4. Source Emissions:

Best available technology (BAT) was not reevaluated for this permitting action, since this action is an administrative modification. However, for P001, the annual PTE for VOC and PM/PM₁₀ emissions was based on a maximum production of 17,300 TPY cooked product allowable throughput. This was originally based on the 7,800 TPY allowable for fried product throughput, plus 9,500 TPY of additional fried throughput based on using 19,000 tons of the All Beef allowable throughput at a usable ratio of 0.5 ton of fried product to 1 ton of All Beef product. However, the true maximum throughput of Cook Line 1 (P001) is 18,250 TPY cooked product. This could actually be accomplished within the throughput restrictions by again substituting 731 tons of the Angus allowable throughput to allow for 950 tons of additional fried product throughput at the usable ratio of 1.3 tons of fried product to 1 ton of Angus product. Therefore, this permitting action will administratively increase the annual allowable VOC emissions for P001. This will not qualify as a Chapter 31 modification since the PTE has always truly been this amount. This will be a correction to the original permit. The VOC emissions limitation will be increased from 19.9 TPY to 21.0 TPY.

The December 10, 2009 guidance for establishing BAT was followed for emissions with the controlled potential to emit being greater than 10 tons per year (TPY). The December 10, 2009 guidance applies to VOC emissions from P001. Following the December 10, 2009 guidance, ORC 3704.03(T) applies to emissions unit P006 for VOC emissions. BAT was chosen according to Step 4 of the guidance since Step 2 and Step 3 did not apply. A BAT format of "tons of emission per rolling 12-month period" was chosen as the appropriate format when processing the previous permit 14-06026. This format remained the same for this permitting action, since we are not reevaluating BAT.

Ohio Administrative Code (OAC) rule 3745-31-05(A)(3), as effective 11/30/2001, applies to emissions unit P001 for PM and PM₁₀ emissions until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 for Ohio's State Implementation Plan (SIP). Best available technology (BAT) is considered employing mass emission limitations and the use of a rotoclone. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 for Ohio's SIP, OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006, will apply for PM and PM₁₀ emissions based on the uncontrolled potential to emit for these pollutants being less than 10 tons per year (TPY).

The hourly VOC emission limitation included in PTIO 14-06026 was removed from the applicability of OAC rule 3745-31-05(A)(3), as effective 11/30/2001, since BAT for VOC is established under ORC 3704.03(T).

OAC rule 3745-31-05(D) applies to emissions unit P001 to restrict facility-wide PM, VOC, and CO₂e emissions to 85.2 TPY PM, 96.3 TPY VOC, and 99,500 TPY CO₂e in order to avoid Title V applicability.

OAC rule 3745-17-07(A) applies to emissions unit P001.

OAC rule 3745-17-07(B) applies to emissions unit P001.



OAC rule 3745-17-11(B) applies to emissions unit P001 by applying the emissions limitation calculated from Table I.

Fuel burning emissions are not included for P001 due to P001 being fired by the Fulton Boiler (6.0 mmBtu/hr boiler). Fuel burning emissions are accounted for under the Fulton Boiler.

Facility-wide worst case CO2e potential to emit is based on natural gas usage and liquid CO2 usage, even though there are some units that have the ability to operate on propane which has higher CO2e emissions factors than natural gas. AdvancePierre Foods stated that if any propane is used in the facility, they cannot also burn natural gas anywhere at the facility. It is either one or the other facility-wide. There are only a few emissions units that have the ability to run on propane, therefore operating the facility on natural gas gives a higher potential to emit overall than operating just the few available units on propane.

5. Conclusion:

This facility will remain a Synthetic Minor facility.

6. Please provide additional notes or comments as necessary:

Approval of FEPTIO P0110240 is recommended. It is recommended that the permit be first issued in draft prior to being issued final, since this permit sets a federally enforceable facility-wide allowable CO2e emissions limitation and fuel usage restriction.

Table with 2 columns: Fee Description and Amount. Rows include Permit Fee (\$500), Admin Mod (Half fee), and Total (\$250).

Prepared by: Amy Kesterman
Date: October 23, 2012

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

Table with 2 columns: Pollutant and Tons Per Year. Rows include PM/PM10 (85.2), VOC (96.3), and CO2e (99,500).

PUBLIC NOTICE

10/30/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

AdvancePierre Foods

9990 Princeton-Glendale Rd.,

West Chester Twp., OH 45246

Butler County

FACILITY DESC.: Rendering and Meat Byproduct Processing

PERMIT #: P0110240

PERMIT TYPE: Administrative Modification

PERMIT DESC: Administrative modification to establish synthetic minor limitations to avoid Title V applicability for greenhouse gas emissions.

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: Paul Tedtman, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AdvancePierre Foods**

Facility ID:	1409000687
Permit Number:	P0110240
Permit Type:	Administrative Modification
Issued:	10/30/2012
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
AdvancePierre Foods

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Authorization

Facility ID: 1409000687

Application Number(s): A0044796

Permit Number: P0110240

Permit Description: Administrative modification to establish synthetic minor limitations to avoid Title V applicability for greenhouse gas emissions.

Permit Type: Administrative Modification

Permit Fee: \$250.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 10/30/2012

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:

AdvancePierre Foods
9990 Princeton-Glendale Rd.
West Chester Twp., OH 45246

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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: P0110240

Permit Description: Administrative modification to establish synthetic minor limitations to avoid Title V applicability for greenhouse gas emissions.

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

Emissions Unit ID:	P001
Company Equipment ID:	Line 1 - Fry/Fry
Superseded Permit Number:	14-06026
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 Southwest Ohio Air Quality Agency 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) OAC rule 3745-31-05(D) shall apply to the following emissions units: B001 (Boiler #1), B002 (Boiler #2), B003 (Boiler #3), B004 (Boiler #4), B005 (Boiler #5), B006 (Boiler Number 6 - 12.56 MMBtu/hr gas fired boiler), B007 (Boiler #7), P001 (Cook Line 1 – Fry/Fry), P002 (Cook Line 2 - Sear/Steam Oven), P003 (Cook Line 3 - Sear/Steam Oven), P004 (Cook Line 4 - Sear/Steam Impinge), P005 (Cook Line 5 - Fry Line), P006 (Cook Line 6 - Sear/Impinge), P007 (Cook Line 7 - Sear/Impinge), P008 (Cook Line 8 - Sear/Impinge), P009 (Cook Line 9 - Sear/Impinge), and P010 (Cook Line 10 - Sear/Impinge)), along with any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units at the facility as this permit is a Synthetic Minor to avoid Title V permitting.

(2) The actual particulate matter (PM) (filterable and condensable) and particulate matter with a diameter 10 microns and less (PM10) (filterable and condensable) stack emissions from emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 85.2 tons per year (TPY) for PM, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

(3) The actual stack emissions of volatile organic compounds (VOC) from emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 96.3 tons per year (TPY) for VOC, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

- (4) The actual carbon dioxide equivalent (CO₂e) emissions from emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 99,500 tons per year (TPY) for CO₂e, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

- (5) The maximum annual production rate for all cooked products in emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, combined, shall not exceed 96,500 tons per year, based on a rolling, 12-month summation of the production rates. This total production rate for all cooked products includes a maximum production rate for Angus beef production of 35,700 tons per year, a maximum production rate for All Beef production of 19,000 tons per year, and a maximum production rate for Fried production of 7,800 tons per year. The permittee has the option of substituting All Beef production, at an exchange of 1.5 tons of All Beef production to 1 ton of Angus beef production, or substituting Fried production, at an exchange of 1.3 tons of Fried production to 1 ton of Angus beef production, for the Angus beef production total limitation of 35,700 tons per rolling, 12-month period. The permittee has the option of substituting Fried production, at an exchange of 0.5 ton of Fried production to 1 ton of All Beef production, for the All Beef production. The production rates for individual products mentioned above shall be based on a rolling, 12-month summation of the individual product production rates.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- (6) The maximum annual natural gas usage rate for emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 698.57 million cubic feet per year, based on a rolling, 12-month summation of the natural gas usage.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- (7) The permittee shall collect and record the following information each month for emissions units P001 through P010, combined:
- a. The identification of each cooked product produced;
 - b. The number of tons of each cooked product produced;
 - c. The total number of tons of all cooked products produced;

- d. The number of additional pounds or tons of All Beef production or Fried production, produced beyond their individual production limitations, to be substituted for Angus beef production;
- e. The number of additional pounds or tons of Fried production, produced beyond the specified Fried production limitation, to be substituted for All Beef production;
- f. The amount of the Angus beef production limitation that has been used, by any combination of Angus beef, All Beef, or Fried production;
- g. The amount of the All Beef production limitation that has been used, by any combination of All Beef or Fried production;
- h. The PM emission factor, in pounds of PM emissions per ton of cooked product, of each cooked product produced;
- i. The VOC emission factor, in pounds of VOC emissions per ton of cooked product, of each cooked product produced;
- j. The total stack PM rate for all cooked products produced, in pounds or tons;
- k. The total stack VOC emission rate for all cooked products produced, in pounds or tons;
- l. The updated rolling, 12-month summation of the total cooked products production, in tons. (This shall include the information for the current month and the preceding eleven months);
- m. The updated rolling, 12-month summation of each individual cooked product production, in tons. (This shall include the information for the current month and the preceding eleven months);
- n. The updated rolling, 12-month summation of stack PM emissions, in tons. (This shall include the information for the current month and the preceding eleven months);
- o. The updated rolling, 12-month summation of stack VOC emissions, in tons. (This shall include the information for the current month and the preceding eleven months);
- p. The updated rolling, 12-month summation of the additional All Beef production or Fried production, produced beyond their individual production limitations, to be substituted for Angus beef production, in tons. (This shall include the information for the current month and the preceding eleven months);
- q. The updated rolling, 12-month summation of the amount of the Angus beef production limitation that has been used, in tons. (This shall include the information for the current month and the preceding eleven months);

- r. The updated rolling, 12-month summation of the additional Fried production, produced beyond the specified Fried production limitation, to be substituted for All Beef production, in tons. (This shall include the information for the current month and the preceding eleven months); and,
 - s. The updated rolling, 12-month summation of the amount of the All Beef production limitation that has been used, in tons. (This shall include the information for the current month and the preceding eleven months).
- (8) The permittee shall collect and record the following information each month for emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined:
- a. The total fuel usage (natural gas or propane), in cubic feet or gallons;
 - b. The total liquid CO2 usage, in tons;
 - c. The total stack PM emissions (filterable and condensable), in tons;
 - d. The total stack VOC emissions, in tons;
 - e. The total CO2e emissions, in tons;
 - f. The updated rolling, 12-month summation of stack PM emissions (filterable and condensable), in tons;
 - g. The updated rolling, 12-month summation of stack VOC emissions, in tons;
 - h. The updated rolling, 12-month summation of CO2e emissions, in tons; and
 - i. The updated rolling, 12-month summation of natural gas usage, in million cubic feet.
- (9) 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:
 - allexceedances of the rolling, 12-month emission limitation for stack PM emissions;
 - allexceedances of the rolling, 12-month emission limitation for stack VOC emissions;
 - allexceedances of the rolling, 12-month emission limitation for CO2e emissions;

all exceedances of the rolling, 12-month restriction on the total cooked products production;

all exceedances of the rolling, 12-month restriction on each individual cooked product production; and

all exceedances of the rolling, 12-month restriction on natural gas usage.

- 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).

- (10) Compliance with the emission limitations in b)(2), b)(3), and b)(4) of these terms and conditions shall be demonstrated by the following methods:

- a. Emission Limitation:

The combined annual stack PM emissions (filterable and condensable) and PM10 from emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 85.2 tons per year (TPY), based on a rolling, 12-month summation.

Applicable compliance method:

Compliance with the rolling, 12-month PM and PM10 stack emissions limitation in b)(2) shall be determined by the record keeping in b)(7) and b)(8).

Actual stack PM emissions for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010 shall be determined based on the following equation from the permittee-supplied information in FEPTIO application P0110240 as submitted on June 5, 2012:

PM = Sum of [(tons of individual cooked product) x (EF) X (1 - CE) / (2000 lbs/ton)] for each cooked product and for each emissions unit, where:

EF = the stack emissions factor for PM emissions (filterable and condensable) for the corresponding cooked product; EF for Angus product = 4.99 lbs of PM/ton of cooked product, EF for All Beef product = 3.32 lbs of PM/ton of cooked product, EF for Pork product = 1.95 lbs of PM/ton of cooked product, EF for Chicken product = 0.53 lb of PM/ton of cooked product, and EF for Fried product = 0.12 lb of PM/ton of cooked product.

CE = the control efficiency of the control equipment for PM for the corresponding control equipment; CE for rotoclones for emissions units P001 - P006 = 30%, and CE for wet scrubbers for emissions units P007 - P010 = 80%.

Stack PM emissions for emissions units B001, B002, B003, B004, B005, B006, B007, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units shall be determined based on applying the appropriate AP-42 emissions factor for the process.

b. Emission Limitation:

The combined annual VOC stack emissions from emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 96.3 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC stack emissions limitation in b)(3) shall be determined by the record keeping in b)(7) and b)(8).

Actual VOC emissions for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, and P010 shall be determined based on the following equation from the permittee-supplied information in FEPTIO application P0110240 as submitted on June 5, 2012:

VOC emissions = Sum of [(tons of individual cooked product) x (EF) X (1 - CE) / (2000 lbs/ton)] for each cooked product and for each emissions unit, where:

EF = the emission factor for stack VOC emissions for the corresponding cooked product; EF for Angus product = 3.88 lbs of VOC/ton of cooked product, EF for All Beef product = 1.45 lbs of VOC/ton of cooked product, EF for Pork product = 0.95 lb of VOC/ton of cooked product, EF for Chicken product = 0.26 lb of VOC/ton of cooked product, and EF for Fried product = 2.87 lbs of VOC/ton of cooked product.

CE = the control efficiency of the control equipment for PM for the corresponding control equipment; CE for rotoclones for emissions units P001 - P006 = 20%, and CE for wet scrubbers for emissions units P007 - P010 = 20%.

Stack VOC emissions for emissions units B001, B002, B003, B004, B005, B006, B007, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units shall be determined based on applying the appropriate AP-42 emissions factor for the process.

c. Emission Limitation:

The actual carbon dioxide equivalent (CO₂e) emissions from emissions units B001, B002, B003, B004, B005, B006, B007, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 99,500 tons per year (TPY) for CO₂e, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month CO₂e emissions limitation in b)(4) shall be determined by the record keeping in b)(8).

Actual CO₂e emissions for emissions units referenced in b)(4) shall be determined based on the following equation from the permittee-supplied information in FEPTIO application P0110240 as submitted on June 5, 2012:

CO₂e emissions = (CO₂ emissions from liquid CO₂ usage) + (CO₂e emissions from fuel usage), where:

Liquid CO₂ usage = CO₂ emissions, in tons.

CO₂e emissions from fuel usage = [(million cubic feet of natural gas usage per year) x (1028 Btu per cubic foot of natural gas heat content) x (117.0046 lbs CO₂e per million Btu heat content) / (2000 lbs/ton)] + [(gallons of propane usage per year) x (0.091 million Btu per gallon of propane heat content) x (136.049 lbs CO₂e per million Btu heat content) / (2000 lbs/ton)] = TPY CO₂e.

- (11) Compliance with the rolling, 12-month production rate restrictions in b)(5) shall be determined by the record keeping in b)(7).
- (12) Compliance with the rolling, 12-month natural gas usage restriction in b)(6) shall be determined by the record keeping in b)(8).

C. Emissions Unit Terms and Conditions



1. P001, Line 1 - Fry/Fry

Operations, Property and/or Equipment Description:

Cook Line 1 – Fry/Fry

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) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	<p>Volatile organic compound (VOC) stack emissions shall not exceed 21.0 tons of emission per rolling, 12-month period.</p> <p>See b)(2)c.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	<p>Particulate matter (PM) stack emissions (filterable and condensable) shall not exceed 0.21 pound per hour.</p> <p>Particulate matter with a diameter 10 microns and less (PM10) stack emissions (filterable and condensable) shall not exceed 0.15 pound per hour.</p> <p>See b)(2)a., b)(2)d., and c)(1).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A), and OAC rule 3745-17-07(B).
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Both Non-Attainment Review and Title V Applicability	See b) of Section B.1.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the plume does not constitute visible emissions.
f.	OAC rule 3745-17-11(B)	Stack particulate emissions (PE) from this emissions unit shall not exceed 6.90 pounds per hour.
g.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

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

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) from this air contaminant source since the uncontrolled potential to emit for both PM and PM10 is less than 10.0 TPY.

- c. Compliance with ORC 3704.03(T) for VOC shall be demonstrated by the mass emission limitations and the use of a rotoclone.
- d. The hourly emission limitations for PM and PM10 are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

c) Operational Restrictions

- (1) This emissions unit shall be vented to the rotoclone at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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.

- (2) The permittee shall collect and record the following information each month for emissions unit P001:
 - a. The identification of each cooked product produced;
 - b. The number of tons of each cooked product produced;
 - c. The VOC emission factor, in pounds of VOC emissions per ton of cooked product, of each cooked product produced;
 - d. The total stack VOC emission rate for all cooked products produced, in pounds or tons;
 - e. The updated rolling, 12-month summation of the total cooked products production, in tons. (This shall include the information for the current month and the preceding eleven months); and
 - f. The updated rolling, 12-month summation of stack VOC emissions, in tons. (This shall include the information for the current month and the preceding eleven months).
- e) Reporting Requirements
 - (1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive particulate emissions.
 - (2) 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.
 - (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:

Volatile organic compound (VOC) stack emissions shall not exceed 21.0 tons of emission per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC stack emission limitation in b)(1)a. shall be determined by the record keeping in d)(2).

The annual emission limitation is based upon the emissions unit's potential to emit. Potential VOC stack emissions were determined based on the following equation from the permittee-supplied information in the FEPTIO P0110240 application as submitted on June 5, 2012:

$$\text{VOC} = (5000 \text{ lbs of cooked product/hr maximum}) / (2000 \text{ lbs/ton}) \times (2.87 \text{ lbs of VOC/ton of cooked product}) \times (7300 \text{ hours per year maximum}) \times (1 - 20\% \text{ control efficiency for VOC}) / (2000 \text{ lbs/ton}) = 21.0 \text{ tons per year.}$$

b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

The uncontrolled potential to emit for stack PM and PM10 from this emissions unit is less than ten tons per year.

Particulate matter (PM) emissions (filterable and condensable) shall not exceed 0.21 pound per hour.

Particulate matter with a diameter 10 microns and less (PM10) stack emissions (filterable and condensable) shall not exceed 0.15 pound per hour.

Applicable Compliance Method:

The potential annual stack PM rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual stack PM rate for emissions unit P001 was determined based on the following equation from the permittee-supplied information in the FEPTIO P0110240 application as submitted on June 5, 2012:

$$PM = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PM/ton of cooked product}) \times (7300 \text{ hours per year maximum}) \times (1 - 30\% \text{ control efficiency for PM}) / (2000 \text{ lbs/ton}) = 0.77 \text{ ton per year of PM.}$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack PM emissions were determined based on the following equation from the permittee-supplied information in the FEPTIO P0110240 application as submitted on June 5, 2012:

$$PM = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PM/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PM}) = 0.21 \text{ pound per hour.}$$

The potential annual PM10 rate is based on this emissions unit's uncontrolled potential to emit.

The potential annual PM10 rate for emissions unit P001 was determined based on the following equation from the permittee-supplied information in the FEPTIO P0110240 application as submitted on June 5, 2012:

$$\text{PM}_{10} = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PM/ton fried cooked product}) \times (7300 \text{ hours per year maximum}) / (2000 \text{ lbs/ton}) \times (1 - 30\% \text{ control efficiency for PM}) \times (70\% \text{ of PM are assumed to be PM}_{10}) = 0.54 \text{ ton per year of PM}_{10}.$$

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly stack PM₁₀ emissions were determined based on the following equation from the permittee-supplied information in the FEPTIO P0110240 application as submitted on June 5, 2012:

$$\text{PM}_{10} \text{ emissions} = (5000 \text{ lbs of cooked product/hr}) / (2000 \text{ lbs/ton}) \times (0.12 \text{ lb of stack PM/ton of cooked product}) \times (1 - 30\% \text{ control efficiency for PM}) \times (70\% \text{ of PM are assumed to be PM}_{10}) = 0.15 \text{ pound per hour.}$$

e. Emission Limitation:

The stack particulate emissions (PE) from this emissions unit shall not exceed 6.90 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

g) Miscellaneous Requirements

(1) None.