



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

1/30/2013

Certified Mail

Karen Teter  
J.M. Smucker Company - Crisco Facility  
5204 Spring Grove Ave.  
Cincinnati, OH 45217

Facility ID: 1431394112  
Permit Number: P0110509  
County: Hamilton

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 11/19/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Southwest Ohio Air Quality Agency





## Response to Comments

Facility ID:	1431394112
Facility Name:	J.M. Smucker Company - Crisco Facility
Facility Description:	Manufacturer of vegetable oils and shortenings
Facility Address:	5204 Spring Grove Avenue Cincinnati, OH 45217 Hamilton County
Permit:	P0110509, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 11/20/2012. The comment period ended on 12/20/2012.	
Hearing date (if held)	NA
Hearing Public Notice Date (if different from draft public notice)	NA

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

### Comments from J.M. Smucker Company, dated 12/17/2012:

#### **1. Topic: Emissions Unit P001**

- a. Comment: On page 20, term d)(1) is a narrative discussion of Continuous Assurance Monitoring (CAM) requirements and purpose. The term is duplicative and unnecessary since most requirements are specified in terms d)(2) and d)(3). We request that term d)(1) be omitted to avoid ambiguity in the permit and incorporate requirements into terms d)(2), d)(3), and d)(4).

Response: Ohio EPA believes it is necessary to stipulate how Part 64 is being satisfied within the terms of the permit. Term d)(1) will be retained in the permit since this is consistent with other Title V renewal permits issued by Ohio EPA; however, revisions will be made to the term to streamline the specific requirements into terms d)(3) and d)(4) as suggested by the permittee.

- b. Comment: On page 21, add clarification to term d)(3) for daily records obtained from continuous pressure drop monitors(s).

Response: Ohio EPA's expectation is that the permittee shall record the reading from the continuous pressure drop monitor(s) each day when the emissions unit is in operation. Ohio EPA does not interpret the term as a requirement for continuous record keeping. Ohio EPA has agreed to change the term to clarify a once per day record keeping requirement.



- c. Comment: On page 24, we request the phrase “if required” be added to term f)(1)b. as there is no affirmative obligation to perform Method 9 readings unless requested by the Agency. This phrase was agreed upon previously in the appeal settlement of the initial Title V permit and should be incorporated into the applicable compliance method for the visible particulate emissions limit.

Response: Ohio EPA understands the permittee’s concern and will include language in term f)(1)b. to address the permittee’s comment.

**2. Topic: Emissions Units P014-P017**

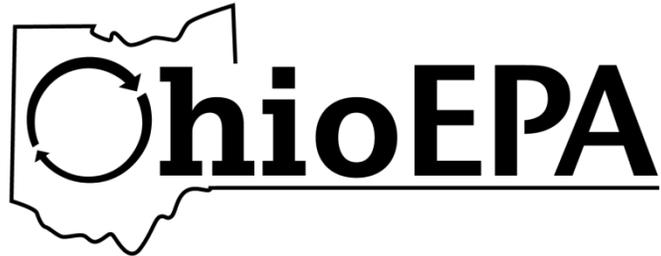
- a. Comment: On pages 26 through 36, terms d)(2), e)(2), and f)(2) for these emissions units reference the underlying Permit-to-Install (PTI) and indicate that the Title V permit terms are as stringent as, or more stringent than, the PTI. Since the underlying PTI was just recently modified (PTI P0111653, issued 11/13/12) and the Title V permit has substantively identical terms, we request all these terms be omitted from the permit as unnecessary.

Response: Ohio EPA agrees with this comment (since no additional gap-filling terms were included in the permit) and will make the change in the permit.

**3. Topic: Emissions Unit P017**

- a. Comment: On page 34, term c)(1) appears to have inadvertently omitted an operational restriction regarding the annual production rate for emissions unit P017 found in term A.II.1 of the current Title V operating permit (issued 12/26/2007). We request the applicable operational restriction be inserted in the terms for P017.

Response: Ohio EPA disagrees with this comment and notes that the underling PTI P0111653 that was modified and issued on 11/13/2012 removed this operational restriction as unnecessary since emissions unit P017 is permitted at its potential to emit (8,760 hrs/yr). Therefore, there is no basis to include this restriction in the Title V renewal permit terms.



**PRELIMINARY PROPOSED**

**Division of Air Pollution Control  
Title V Permit**

for

J.M. Smucker Company - Crisco Facility

Facility ID:	1431394112
Permit Number:	P0110509
Permit Type:	Renewal
Issued:	1/30/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
J.M. Smucker Company - Crisco Facility

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**Preliminary Proposed Title V Permit**

J.M. Smucker Company - Crisco Facility

**Permit Number:** P0110509

**Facility ID:** 1431394112

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1431394112  
Facility Description:  
Application Number(s): A0044711  
Permit Number: P0110509  
Permit Description: Renewal Title V permit for J.M Smucker Company's Crisco facility, a manufacturer of vegetable oils and shortenings, which includes two batch hardening processes, two continuous deodorization processes, a refinery process to refine and bleach crude vegetable oils, and dry material unloading and handling operations.  
Permit Type: Renewal  
Issue Date: 1/30/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0099951

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

J.M. Smucker Company - Crisco Facility  
5204 Spring Grove Avenue  
Cincinnati, OH 45217

Ohio Environmental Protection Agency (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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Southwest Ohio Air Quality Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



**Preliminary Proposed Title V Permit**  
J.M. Smucker Company - Crisco Facility  
**Permit Number:** P0110509  
**Facility ID:** 1431394112  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive



measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Southwest Ohio Air Quality Agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



**Preliminary Proposed Title V Permit**

J.M. Smucker Company - Crisco Facility

**Permit Number:** P0110509

**Facility ID:** 1431394112

**Effective Date:** To be entered upon final issuance

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*



### 13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. An identification of each term or condition of this permit that is the basis of the certification.



- b. The permittee's current compliance status.
  - c. Whether compliance was continuous or intermittent.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*



## **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of



a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



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## **B. Facility-Wide Terms and Conditions**



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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
  
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

P025 – 225 Hp Fire Protection Pump [PBR10152]
  
3. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions unit P001. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions unit.

(Authority for term: 40 CFR Part 64)



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## **C. Emissions Unit Terms and Conditions**



**1. P001, Dry Material Unloading and Handling**

**Operations, Property and/or Equipment Description:**

Dry Material Unloading and Handling

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 24 pounds per hour based on Table I, which is more stringent than Figure II.
c.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)a., d)(1) – d)(6), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7)

b. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1))

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the presence of visible particulate emissions exiting the stacks venting from the Pre-bleach Silo final filter (IS-4A-3) and the Earth Silo Tank baghouse (IS-4A-1) and pressure drop checks on the Pre-bleach Silo final filter (IS-4A-3) and the Earth Silo Tanks baghouse (IS-4A-1). The visible particulate emissions indicator is any occasion when visible emissions are observed exiting the baghouse stack and are not determined to be from normal operations. The pressure drop indicator is any occasion when the pressure drop checks show operation outside normal operating ranges established in d)(3). When abnormal visible emissions are observed and/or the pressure drop across the Pre-bleach Silo final filter (IS-4A-3) and/or the Earth Silo Tank baghouse (IS-4A-1) are outside of their ranges, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

- (2) 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 stacks venting from the Pre-bleach Silo final filter (IS-4A-3) and the Earth Silo Tank baghouse (IS-4A-1). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)



- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the Pre-bleach Silo final filter (IS-4A-3) and the Earth Silo Tank baghouse (IS-4A-1) when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the Pre-bleach Silo final filter (IS-4A-3) and the Earth Silo Tank baghouse (IS-4A-1) once per day when the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

The indicator range for the pressure drop across the Pre-bleach Silo final filter (IS-4A-3) is between 0.1 and 10 inches of water column and the indicator range for the pressure drop across the Earth Silo Tank baghouse (IS-4A-1) is between 0.1 and 12 inches of water column. Whenever the recorded values for the pressure drops are outside these ranges, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

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

In response to each required investigation to determine the cause of an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the excursion ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.



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

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.9)

- (4) Upon detecting an excursion of the pressure drop across the Pre-bleach Silo final filter (IS-4A-3) and/or the Earth Silo Tank baghouse (IS-4A-1) and/or abnormal visible emission observations, the permittee shall restore operation of the emissions unit (including the control devices) to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

- (6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the Pre-bleach Silo final filter (IS-4A-3) and/or the Earth Silo Tank baghouse (IS-4A-1);
  - b. all days during which any abnormal visible particulate emissions were observed from the Pre-bleach Silo final filter (IS-4A-3) and/or the Earth Silo Tank baghouse (IS-4A-1) stack serving this emissions unit and the cause of each incident;
  - c. each period of time (start time and date, and end time and date) when the pressure drop across the Pre-bleach Silo final filter (IS-4A-3) and/or the Earth Silo Tank baghouse (IS-4A-1) was outside of the ranges specified in d)(3) and the cause of each incident;
  - d. the date, time, and duration of any downtime of the Pre-bleach Silo final filter (IS-4A-3) and/or the Earth Silo Tank baghouse (IS-4A-1) continuous monitoring equipment (other than downtime associated with zero and span or other daily calibration checks) while the emissions unit was in operation and the cause of each incident;
  - e. the corrective action(s) taken for each incident described in (a), (b), and (c);
  - f. an identification of each incident described in (a), (b), and (c) where a prompt investigation was not conducted;
  - g. an identification of each incident described in (a), (b), and (c) where prompt corrective action, that would bring the emissions unit into compliance and/or the Pre-bleach Silo final filter (IS-4A-3) and the Earth Silo Tank baghouse (IS-4A-1) pressure drop indicator ranges defined in d)(3) into an acceptable range, was determined to be necessary and was not taken; and
  - h. an identification of each incident described in (a), (b), and (c) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

- (2) If the permittee is required under 40 CFR Part 64.8 and d)(6) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)



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:

Particulate emissions (PE) shall not exceed 24 pounds per hour.

Applicable Compliance Method:

Compliance may be demonstrated using the emission factor from AP-42, Fifth Edition, Table 11.17-4, Material Handling for Lime (similar physical properties as bleached clay) of 2.2 pounds of PE/ton of material handled as follows:

2.2 pounds of PE/ton of material handled x 14 tons/hr (maximum amount of material handled) x (1 - .99) control efficiency of baghouse = 0.308 pound of PE/hour.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 – 5.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(B))

b. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1), and OAC rule 3745-17-07(A)(1))

g) Miscellaneous Requirements

(1) None.



**2. P014, Batch Hardening 1**

**Operations, Property and/or Equipment Description:**

Batch process to hydrogenate refined vegetable oils

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)  [PTI P0111653, issued 11/13/2012]	Organic Compound (OC) emissions shall not exceed 31.2 pounds per day* and 5.7 tons per year.  *The pounds per day OC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.
b.	OAC rule 3745-21-07(M)	See b)(2)a.

- (2) Additional Terms and Conditions

- a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the amount of each vegetable oil processed;
    - b. the average hexane content of each vegetable oil, in ppm;



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- c. the total OC emissions (as hexane), from all vegetable oils processed, in pounds or tons, calculated in accordance with the methodology specified in the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit; and
- d. the year-to-date total amount of each vegetable oil processed.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total amount of each vegetable oil produced, the individual monthly OC emissions, and the total annual OC emissions. These reports shall be submitted by January 31 of each year and cover the previous calendar year's production.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

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:

Organic Compound (OC) emissions shall not exceed 31.2 pounds per day.

Applicable Compliance Method:

The daily emission limitation is based on the emissions unit's potential to emit. This emission rate was calculated using the emission factors and production data from the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A to determine the hourly emission rate and the hourly emission rate shall be multiplied by the maximum daily hours of operation for the emission unit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

b. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 5.7 tons per year.



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Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by the recordkeeping in d)(1).

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

g) Miscellaneous Requirements

(1) None.



**3. P015, Batch Hardening 2**

**Operations, Property and/or Equipment Description:**

Batch process to hydrogenate refined vegetable oils

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)  [PTI P0111653, issued 11/13/2012]	Organic Compound (OC) emissions shall not exceed 29.28 pounds per day* and 5.32 tons per year.  *The pounds per day OC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.
b.	OAC rule 3745-21-07(M)	See b)(2)a.

- (2) Additional Terms and Conditions

- a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the amount of each vegetable oil processed;
    - b. the average hexane content of each vegetable oil, in ppm;



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- c. the total OC emissions (as hexane), from all vegetable oils processed, in pounds or tons, calculated in accordance with the methodology specified in the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit; and
- d. the year-to-date total amount of each vegetable oil processed.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total amount of each vegetable oil produced, the individual monthly OC emissions, and the total annual OC emissions. These reports shall be submitted by January 31 of each year and cover the previous calendar year's production.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

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:

Organic Compound (OC) emissions shall not exceed 29.28 pounds per day.

Applicable Compliance Method:

The daily emission limitation is based on the emissions unit's potential to emit. This emission rate was calculated using the emission factors and production data from the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A to determine the hourly emission rate and the hourly emission rate shall be multiplied by the maximum daily hours of operation for the emission unit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

b. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 5.32 tons per year.



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Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by the recordkeeping in d)(1).

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

g) Miscellaneous Requirements

(1) None.



**4. P016, Continuous Deodorization 1**

**Operations, Property and/or Equipment Description:**

Continuous process to deodorize refined vegetable oils

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)  [PTI P0111653, issued 11/13/2012]	Organic Compound (OC) emissions shall not exceed 135.12 pounds per day* and 7.48 tons per year.  *The pounds per day OC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.  See c)(1).
b.	OAC rule 3745-21-07(M)	See b)(2)a.

- (2) Additional Terms and Conditions

- a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

- c) Operational Restrictions

- (1) The production rates shall not exceed the amounts listed in the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of each vegetable oil processed;
  - b. the average hexane content of each vegetable oil, in ppm;
  - c. the total OC emissions (as hexane), from all vegetable oils processed, in pounds or tons, calculated in accordance with the methodology specified in the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit; and
  - d. the year-to-date total amount of each vegetable oil processed.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total amount of each vegetable oil produced, the individual monthly OC emissions, and the total annual OC emissions. These reports shall be submitted by January 31 of each year and cover the previous calendar year's production.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

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:

Organic Compound (OC) emissions shall not exceed 135.12 pounds per day.

Applicable Compliance Method:

The daily emission limitation is based on the emissions unit's potential to emit. This emission rate was calculated using the emission factors and production data from the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A to determine the hourly emission rate and the hourly emission rate shall be multiplied by the maximum daily hours of operation for the emission unit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))



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b. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 7.48 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by the recordkeeping in d)(1).

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

g) Miscellaneous Requirements

(1) None.



**5. P017, Continuous Deodorization 2**

**Operations, Property and/or Equipment Description:**

Continuous process to deodorize refined vegetable oils

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)  [PTI P0111653, issued 11/13/2012]	Organic Compound (OC) emissions shall not exceed 57.84 pounds per day* and 10.56 tons per year.  *The pounds per day OC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.
b.	OAC rule 3745-21-07(M)	See b)(2)a.

- (2) Additional Terms and Conditions

- a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the amount of each vegetable oil processed;
    - b. the average hexane content of each vegetable oil, in ppm;



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- c. the total OC emissions (as hexane), from all vegetable oils processed, in pounds or tons, calculated in accordance with the methodology specified in the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit; and
- d. the year-to-date total amount of each vegetable oil processed.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total amount of each vegetable oil produced, the individual monthly OC emissions, and the total annual OC emissions. These reports shall be submitted by January 31 of each year and cover the previous calendar year's production

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

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:

Organic Compound (OC) emissions shall not exceed 57.84 pounds per day.

Applicable Compliance Method:

The daily emission limitation is based on the emissions unit's potential to emit. This emission rate was calculated using the emission factors and production data from the confidential application for the initial Permit to Install #14-04344, issued on June 2, 1997, for this emissions unit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A to determine the hourly emission rate and the hourly emission rate shall be multiplied by the maximum daily hours of operation for the emission unit.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))



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b. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 10.56 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by the recordkeeping in d)(1).

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

g) Miscellaneous Requirements

(1) None.



**6. P018, Refinery**

**Operations, Property and/or Equipment Description:**

Continuous process to refine and bleach crude vegetable oils

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)	See b)(2)a.

- (2) Additional Terms and Conditions

- a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) None.

- e) Reporting Requirements

- (1) None.

- 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. None.



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g) Miscellaneous Requirements

(1) None.