



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
PUTNAM COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-13378

DATE: 2/16/00

Iams Company
Chuck Beckman
PO Box 87 3700 St Rte 87
Leipsic, OH 45856-0087

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 2/16/00

FINAL PERMIT TO INSTALL 03-13378

Application Number: 03-13378
APS Premise Number: 0369000037
Permit Fee: **\$6400**
Name of Facility: Iams Company
Person to Contact: Chuck Beckman
Address: PO Box 87 3700 St Rte 87
Leipsic, OH 458560087

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3700 St Rt 65
Leipsic, Ohio**

Description of proposed emissions unit(s):

Pet food production line

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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 quarterly, i.e., 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.)

3. Records Retention Requirements

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.

4. 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.

5. 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

Iams Company
PTI Application: 03-13378
Issued: 2/16/00

Facility ID: 0369000037

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	13.73

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
product bin storage with aeration system; unit E18 A & B	OAC rule 3745-31-05	<u>from aeration system stack:</u> 1.48 lbs particulate emissions (PE)/hr, and 3.2 TPY PE
		0% opacity
	OAC rule 3745-17-11(B)(2)	see A.2.a
	OAC rule 3745-17-07(A)	see A.2.a

2. Additional Terms and Conditions

- 2.a The emissions limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

None.

D. Reporting Requirements

8

Iams C

PTI A

Issued: 2/16/00

Emissions Unit ID: **P014**

None.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

1.48 lb PE/hr, and 6.48 TPY PE

- Applicable Compliance Method:

PE from this emissions unit is generated from the aeration of 16 product storage bins which are vented to two exhaust stacks. The permittee shall demonstrate compliance with the hourly emission limitation based upon a company supplied outlet emission concentration of 0.008 gr/cfm and a maximum combined flow rating of 21,600 cfm total from all sixteen product storage bins. If required, compliance with the particulate emission limitation shall be determined in accordance with the test method and procedures in 40 CFR 60, Appendix A, Method 5.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

F. Miscellaneous Requirements

This permit supercedes all limits, terms and conditions specific to this emissions unit contained in PTI #03-13280 issued December 15,1999.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
line #3 extruding, drying, cooling and material handling, utilizing cyclones; unit E16	OAC rule 3745-31-05	0.70 lb particulate emissions (PE) /hr, and 3.1 TPY PE
	OAC rule 3745-17-11(B)(2)	10% opacity, as a 3 minute average
	OAC rule 3745-17-07(A)	see A.2.a

2. Additional Terms and Conditions

- 2.a The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The pressure drop across the cyclones shall be maintained within the range of * inches of water while the emissions unit is in operation.
 - * Not more than 180 days following the issuance of this permit, the permittee shall notify the Ohio EPA in writing of the pressure drop across the triple cyclone. The permittee shall operate the cyclone in accordance with these reported values.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: P015

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the cyclones while 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). The permittee shall record the pressure drop across the cyclone once per day of operation.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the cyclone did not comply with the allowable range specified above.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.70 lb PE/hr, and 3.1 TPY PE

- a. Applicable Compliance Method:

PE from this emissions unit is generated from an extruded air lift system and a dryer which are exhausted through a common stack. PE from the extruded air lift will be uncontrolled and PE from the dryer will be controlled by triple cyclones. The combined emissions will be 0.70 lb PE/hr as determined in accordance with the following:

$$\text{PE}(\text{from combined stack emissions}) = \text{EAE} + \text{DCE}$$

$$\begin{aligned} \text{EAE} &= \text{PE from uncontrolled emissions from extruded airlift exhaust} \\ &= 6400 \text{ dscf/min} \times 60 \text{ min/hr} \times 3.42^{-03} \text{ gr/dscf} \times 1 \text{ lb/7000 gr} \\ &= 0.188 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} \text{DCE} &= \text{PE from dryer cyclone exhaust} \\ &= 40,500 \text{ dscf/min} \times 60 \text{ min/hr} \times 0.0912 \text{ gr/dscf} \times 1 \text{ lb/7000 gr} \\ &= 0.507 \text{ lb PE/hr} \end{aligned}$$

$$\text{PE (from combined stack emissions)} = (0.188 \text{ lb PE/hr}) + (0.507 \text{ lb PE/hr}) = 0.70 \text{ lb PE/hr.}$$

Iams C
PTI A
Issued: 2/16/00

Emissions Unit ID: **P015**

Compliance will be demonstrated by the monitoring and recordkeeping specified in section C.1 of this permit. If required, compliance with the particulate emission limitation shall be determined in accordance with the test method and procedures in 40 CFR 60, Appendix A, Method 5.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

10% opacity, as a 3 minute average

Applicable Compliance Method:

Method 9, 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
line #4 extruding, drying, cooling and material handling, utilizing cyclones; unit E17	OAC rule 3745-31-05	0.70 lb particulate emissions (PE) /hr, and 3.1 TPY PE
	OAC rule 3745-17-11(B)(2)	10% opacity, as a 3-minute average
	OAC rule 3745-17-07(A)	see A.2.a

2. Additional Terms and Conditions

- 2.a The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The pressure drop across the cyclones shall be maintained within the range of * inches of water while the emissions unit is in operation.
 - * Not more than 180 days following the issuance of this permit, the permittee shall notify the Ohio EPA in writing of the pressure drop across the triple cyclone. The permittee shall operate the cyclone in accordance with these reported values.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: P016

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the cyclones while 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). The permittee shall record the pressure drop across the cyclone once per day of operation.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the cyclone did not comply with the allowable range specified above.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.70 lb PE/hr, and 3.1 TPY PE

- a. Applicable Compliance Method:

PE from this emissions unit is generated from an extruded air lift system and a dryer which are exhausted through a common stack. PE from the extruded air lift will be uncontrolled and PE from the dryer will be controlled by triple cyclones. The combined emissions will be 0.70 lb PE/hr as determined in accordance with the following:

$$\text{PE}(\text{from combined stack emissions}) = \text{EAE} + \text{DCE}$$

$$\begin{aligned} \text{EAE} &= \text{PE from uncontrolled emissions from extruded airlift exhaust} \\ &= 6400 \text{ dscf/min} \times 60 \text{ min/hr} \times 3.42^{-03} \text{ gr/dscf} \times 1 \text{ lb/7000 gr} \\ &= 0.188 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} \text{DCE} &= \text{PE from dryer cyclone exhaust} \\ &= 40,500 \text{ dscf/min} \times 60 \text{ min/hr} \times 0.0912 \text{ gr/dscf} \times 1 \text{ lb/7000 gr} \\ &= 0.507 \text{ lb PE/hr} \end{aligned}$$

$$\text{PE}(\text{from combined stack emissions}) = (0.188 \text{ lb PE/hr}) + (0.507 \text{ lb PE/hr}) = 0.70 \text{ lb PE/hr.}$$

Compliance will be demonstrated by the monitoring and recordkeeping specified in section

C.1 of this permit. If required, compliance with the particulate emission limitation shall be determined in accordance with the test method and procedures in 40 CFR 60, Appendix A, Method 5.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

b. Emission Limitation:

10% opacity, as a 3 minute average

Applicable Compliance Method:

Method 9, 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hopper truck and railcar grain or ingredient loadout system w/baghouse	OAC rule 3745-31-05	control requirements (see A.2.d) <u>baghouse stack:</u> 0.01 gr/dscf, 0.09 lb particulate emissions (PE)/hr*, 0.39 TPY PE* <u>fugitive emissions:</u> 0.66 TPY PE 5% opacity from grain/meal loading operations 0% opacity from the baghouse 0% opacity from grain handling/storage operations
	OAC rule 3745-17-11(B)(2)	see A.2.a
	OAC rule 3745-17-07(A)	see A.2.a
	OAC rule 3745-17-08(B)	none (see A.2.b)
	OAC rule 3745-17-07(B)	none (see A.2.c)

*All PE from the baghouse are considered to be PM₁₀

17

Iams C

PTI A

Issued: 2/16/00

Emissions Unit ID: **P903**

2. Additional Terms and Conditions

- 2.a** The emission limitations and control requirements established by OAC rules 3745-17-11(B) and 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
- 2.b** The Iams Company Facility is not located within an "appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements.
- 2.c** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e)
- 2.d** The "Best Available Technology" (BAT) control requirements for emissions unit P903 have been determined to be the following:
 - i. Use of a two sided enclosure for truck/railcar loading.
 - ii. Use of an aspiration system vented to a baghouse serving the transferring and conveying of grain/meal.
 - iii. Use of telescoping chute for truck/railcar loading.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5 inches of water while the emissions unit is in operation.
- 2. The maximum annual throughput for emissions unit P903 shall not exceed 31,000 tons of grain and/or ingredients.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while 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). The permittee shall record the pressure drop across the baghouse on a daily basis.
- 2. The permittee shall maintain annual records of the grain and/or ingredients throughput for this

Iams Company
PTI Application: 02 12270
Issued

Facility ID: 0369000037

Emissions Unit ID: **P903**

emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit annual reports which identify any exceedances of the annual grain throughput limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.01 gr/dscf from baghouse

Applicable Compliance Method:

The limitation was determined in accordance with the manufacturers guaranteed outlet grain loading. If required the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR 60, Appendix A.

- b. Emission Limitation:

0.09 lb PE/hr, and 0.39 TPY PE from baghouse

Applicable Compliance Method:

The emission limitation was developed by using a baghouse outlet grain loading emission factor (see E.1.a) and maximum volumetric air flow rates. Compliance shall be demonstrated by the monitoring and record keeping specified in section C1. If required the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR 60, Appendix A.

The tons per year limitation was developed by multiplying the lb/hr allowable mass emissions rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance

21

Iams C

PTI A

Issued: 2/16/00

Emissions Unit ID: **P903**

will also be shown with the annual limitation.

c. Emission Limitation:

0.66 TPY PE from fugitive emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by using AP-42, chapter 9.9.1 (5/98) emission factor of 0.035 lb PE/ton handled, the annual grain throughput for this emissions source and a control efficiency of 50% obtained from the use of a 2 sided control structure and the use of a telescoping spout. Compliance shall be demonstrated by the monitoring and record keeping specified in section C2.

d. Emission Limitation:

- i. Visible emissions shall not exceed 5% opacity from grain loading operations.
- ii. Visible emissions shall not exceed 0% opacity from the baghouse.
- iii. Visible emissions shall not exceed 0% opacity from grain handling/conveying operations.

Applicable Compliance Method:

Method 9 of 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

None.

NEW SOURCE REVIEW FORM B

PTI Number: 03-13378 Facility ID: 0369000037

FACILITY NAME Iams Company

FACILITY DESCRIPTION Pet food production line CITY/TWP Leinsic

Emissions Unit ID: P903

SIC CODE 2047 SCC CODE 3-02-005-06 EMISSIONS UNIT ID P014

EMISSIONS UNIT DESCRIPTION product bin storage with aeraton system; unit E18 A & B

DATE INSTALLED Upon receipt of permit

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	1.48	3.2	1.48	3.2
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination none required

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 03-13378

Facility ID: 0369000037

FACILITY NAME Iams Company

FACILITY DESCRIPTION Pet food production line

CITY/TWP Leinsic

Emissions Unit ID: **P903**

SIC CODE 2047

SCC CODE 3-02-005-04

EMISSIONS UNIT ID P015

EMISSIONS UNIT DESCRIPTION line #2 extruding, drying, cooling and material handling, utilizing cyclones; unit E16

DATE INSTALLED upon receipt of permit

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.70 lb/hr	3.1	0.70 lb/hr	3.1
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination cyclone

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13378 Facility ID: 0369000037

FACILITY NAME Iams Company

FACILITY DESCRIPTION Pet food production line CITY/TWP Leinsic

Emissions Unit ID: P903

SIC CODE 2047 SCC CODE 3-02-005-04 EMISSIONS UNIT ID P016

EMISSIONS UNIT DESCRIPTION line #4 extruding, drying, cooling and material handling, utilizing cyclones; unit E17

DATE INSTALLED upon receipt of permit

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.70 lb/hr	3.1	0.70 lb/hr	3.1
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: cyclone

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 03-13378 Facility ID: 0369000037

FACILITY NAME Iams Company

FACILITY DESCRIPTION Pet food production line CITY/TWP Leinsic

Emissions Unit ID: **P903**

SIC CODE 2047 SCC CODE 3-02-005-06 EMISSIONS UNIT ID P903

EMISSIONS UNIT DESCRIPTION railcar and truck loading area

DATE INSTALLED upon receipt of permit

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.01 gr/dscr, 0.09 lb/hr	1.05	0.01 gr/dscr, 0.09 lb/hr	1.05
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

2 NEW SC

PTI Num

FACILITY

FACILITY DESCRIPTION Pet food production line

Emissions Unit ID: **P903** _____
CITY/TWP Leipsic

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Permit review form and calculations

Please provide any additional permit specific notes as you deem necessary:

NONE

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

PE

13.73