



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
PUTNAM COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-16295

Fac ID: 0369000037

DATE: 4/28/2005

Iams Company
Tim Stults
PO Box 87 3700 State Route 65 North
Leipsic, OH 45856

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$8250** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO

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**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-16295

Application Number: 03-16295
Facility ID: 0369000037
Permit Fee: **To be entered upon final issuance**
Name of Facility: Iams Company
Person to Contact: Tim Stults
Address: PO Box 87 3700 State Route 65 North
Leipsic, OH 45856

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3700 St Rt 65
Leipsic, Ohio**

Description of proposed emissions unit(s):
Modification to 3 hammermills with addition of 2 more + addition of 2 process lines and 8 packaging bins.

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

Iams Company

Facility ID: 0369000037

PTI Application: 03-16295

Issued: To be entered upon final issuance

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

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

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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

Iams Company**Facility ID: 0369000037****PTI Application: 03-16295****Issued: To be entered upon final issuance**

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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	30.29
PM ₁₀	26.79
VOC	21.54
CO	19.62
NO _x	12.36

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>
P009 - Ration hammermill grinder and separation plenum (Company ID for this emissions unit is E12)	OAC rule 3745-31-05(A)(3)	0.91 pounds particulate emissions (PE) per hour; 3.99 tons PE per year*
This is a modification to PTI #03-16096 issued final on November 2, 2004 to change the volumetric air flow rate from 6,240 acfm to 10,611 acfm		Control requirements (see A.2.a)
		Visible particulate emissions shall not exceed 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)	see A.2.b
	OAC rule 3745-31-05(C)	see A.2.c

* All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 gr/dscf.

BAT requirements also include compliance with the terms and conditions of this permit.

- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Issued: To be entered upon final issuance

- 2.c This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a baghouse system to a maximum outlet concentration of 0.01 gr/dscf and a maximum mass emission rate of 0.91 pounds per hour.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping 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.

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.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this emission limitation

Iams Company
PTI Application: 02 16205
Issued

Facility ID: 0369000037

Emissions Unit ID: **P009**

shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation:
0.91 pounds PE per hour & 3.99 tons PE per year

Iams C**PTI A**Emissions Unit ID: **P009****Issued: To be entered upon final issuance**Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 10,611 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation 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.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. This permit supercedes the terms and conditions contained in PTI #03-16096 issued final on November 2, 2004 for this emissions unit.

Iams C
PTI A

Emissions Unit ID: **P018**

Issued: **To be entered upon final issuance**

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>
P018 - Hammermill grinder and separation plenum (Company ID for this emissions unit is E6A) This is a modification to PTI #03-16096 issued final on November 2, 2004 to change the volumetric air flow rate from 6,240 acfm to 10,611 acfm	OAC rule 3745-31-05(A)(3)	0.91 pounds particulate emissions (PE) per hour; 3.99 tons PE per year*
		Control requirements (see A.2.a)
		Visible particulate emissions shall not exceed 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)	see A.2.b
	OAC rule 3745-31-05(C)	see A.2.c

* All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 gr/dscf.

BAT requirements also include compliance with the terms and conditions of this permit.

- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Issued: To be entered upon final issuance

- 2.c This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a baghouse system to a maximum outlet concentration of 0.01 gr/dscf and a maximum mass emission rate of 0.91 pounds per hour.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping 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.

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.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this emission limitation

Iams Company

PTI Application: 02 16205

Issued

Facility ID: 0369000037

Emissions Unit ID: **P018**

shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation:
0.91 pounds PE per hour & 3.99 tons PE per year

Iams C**PTI A**Emissions Unit ID: **P018****Issued: To be entered upon final issuance**Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 10,611 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation 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.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. The modification of this emissions unit will result in a baghouse stack height of 65.5 feet above ground level which was used in air dispersion modeling to demonstrate compliance with Ohio EPA's acceptable incremental impact.
2. This permit supercedes the terms and conditions contained in PTI #03-16096 issued final on November 2, 2004 for this emissions unit.

Iams C
PTI A

Emissions Unit ID: P019

Issued: To be entered upon final issuance

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>
P019 - Hammermill grinder and separation plenum (Company ID for this emissions unit is E6B) This is a modification to PTI #03-16096 issued final on November 2, 2004 to change the volumetric air flow rate from 6,240 acfm to 10,611 acfm	OAC rule 3745-31-05(A)(3)	0.91 pounds particulate emissions (PE) per hour; 3.99 tons PE per year*
		Control requirements (see A.2.a)
		Visible particulate emissions shall not exceed 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)	see A.2.b
	OAC rule 3745-31-05(C)	see A.2.c

* All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 gr/dscf.

BAT requirements also include compliance with the terms and conditions of this permit.

- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2.c This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a baghouse system to a maximum outlet concentration of 0.01 gr/dscf and a maximum mass emission rate of 0.91 pounds per hour.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping 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.

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.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this emission limitation

Iams C

PTI A

Emissions Unit ID: **P019**

Issued: To be entered upon final issuance

shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation:
0.91 pounds PE per hour & 3.99 tons PE per year

Iams C**PTI A**Emissions Unit ID: **P019****Issued: To be entered upon final issuance**Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 10,611 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation 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.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. The modification of this emissions unit will result in a baghouse stack height of 65.5 feet above ground level which was used in air dispersion modeling to demonstrate compliance with Ohio EPA's acceptable incremental impact.
2. This permit supercedes the terms and conditions contained in PTI #03-16096 issued final on November 2, 2004 for this emissions unit.

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>
P027 - Process Line #5 extruding, drying, cooling and material handling (Company ID is E23)	OAC rule 3745-31-05(A)(3)	0.81 pounds PE per hour; 3.55 tons PE per year
		0.41 pounds particulate matter 10 microns in diameter or less (PM ₁₀) per hour; 1.80 tons PM ₁₀ per year
		2.24 pounds carbon monoxide (CO) per hour; 9.81 tons CO per year
		1.41 pounds nitrogen oxide (NO _x) per hour; 6.18 tons NO _x per year
		2.46 pounds organic compounds (OC) per hour; 10.77 tons OC per year
		Control requirements (see A.2.a)
		Visible particulate emissions shall not exceed 5% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)	see A.2.b
	OAC rule 3745-31-05(C)	see A.2.c

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Iams C

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P027**

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the use of three cyclones (in series) that control emissions from the dryer and the cooler. BAT requirements also include compliance with the terms and conditions of this permit.
- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by cyclones to a maximum mass emission rate of 0.81 pounds per hour.

B. Operational Restrictions

- 1. The pressure drop across the cyclones shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Record keeping Requirements

- 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 on a daily basis.
- 2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.
- 3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the amount of material produced, in tons, through this emissions unit;
 - b. the annual, year to date material produced, in tons (sum of C.3.a. for each calendar month to date from January to December).

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Iams C

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P027**

Issued: To be entered upon final issuance

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 cyclones did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit annual reports which identifies the amount of material, in tons, produced in emissions unit P027. This report shall be submitted by January 31 of each year and shall cover the previous calendar 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. Emissions Limitation:
0.81 pounds PE per hour and 3.55 tons per year of PE

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 is controlled by a cyclone and PE from the dryer will be controlled by cyclones. The combined emissions will be 0.81 lb PE/hr and compliance shall be determined in accordance with the following:

The combined flow rate from the air lift system and the dryer is 6,400 dscf/min + 40,500 dscf/min = 46,900 dscf/min. The outlet concentration was developed based on a stack test of a similar emissions unit, P010, on March 1, 2000.

$$PE = 46,900 \text{ dscf/min} \times 2.02^{-03} \text{ gr/dscf} \times 60 \text{ min/hr} \times 1 \text{ lb/7000 gr} = 0.81 \text{ lb/hr}$$

If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

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

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will also be shown with the annual limitation.

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- b. Emissions Limitation:
0.41 pounds PM₁₀ per hour and 1.80 tons per year of PM₁₀

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the hourly PE rate by a factor of 0.5 [stated in the footnote of AP-42's Table 9.9.1-2 for Animal Feed Mill Pellet Coolers (03/2003)]. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in Method 201 or 201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

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.

- c. Emissions Limitation:
2.24 pounds CO/hour and 9.81 tons CO/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a manufacturer's emission factor of 0.160 pounds CO per MMBTU with the maximum heat input capacity of 14 MMBTU per hour. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

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.

- d. Emissions Limitation:
1.41 pounds NO_x/hour and 6.18 tons NO_x/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying a manufacturer's emission factor of 0.101 pounds NO_x per MMBTU with the maximum heat input capacity of 14 MMBTU per hour. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4 and 7.

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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.

- e. Emissions Limitation:
2.46 pounds OC/hour and 10.77 tons OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying an emission factor derived from the stack testing of 0.154 pounds of OC per ton of product with the maximum product capacity of 16 tons per hour. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4, 18, 25 or 25A as applicable.

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. Emissions Limitation:
Visible particulate emissions from the stack shall not exceed 5 percent opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the test methods and procedures specified in US EPA Method 9 of 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>
P028 - Process Line #6 extruding, drying, cooling and material handling (Company ID is E24)	OAC rule 3745-31-05(A)(3)	0.81 pounds PE per hour; 3.55 tons PE per year
		0.41 pounds particulate matter 10 microns in diameter or less (PM ₁₀) per hour; 1.80 tons PM ₁₀ per year
		2.24 pounds carbon monoxide (CO) per hour; 9.81 tons CO per year
		1.41 pounds nitrogen oxide (NO _x) per hour; 6.18 tons NO _x per year
		2.46 pounds organic compounds (OC) per hour; 10.77 tons OC per year
		Control requirements (see A.2.a)
		Visible particulate emissions shall not exceed 5% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)	see A.2.b
	OAC rule 3745-31-05(C)	see A.2.c

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2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the use of three cyclones (in series) that control emissions from the dryer and the cooler. BAT requirements also include compliance with the terms and conditions of this permit.
- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by cyclones to a maximum mass emission rate of 0.81 pounds per hour.

B. Operational Restrictions

- 1. The pressure drop across the cyclones shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Record keeping Requirements

- 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 on a daily basis.
- 2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.
- 3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the amount of material produced, in tons, through this emissions unit;

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- b. the annual, year to date material produced, in tons (sum of C.3.a. for each calendar month to date from January to December).

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1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the cyclones did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit annual reports which identifies the amount of material, in tons, produced in emissions unit P028. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emissions limitations of PE, PM₁₀, NO_x, and CO.
 - c. The following test methods shall be employed to demonstrate compliance: for PE, Methods 1-5 of 40 CFR Part 60, for PM₁₀, Methods 1-4 of 40 CFR Part 60 and 201 or 201A of 40 CFR Part 51, for NO_x, Methods 1-4 and 7, and for CO, Methods 1-4 and 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - d. The tests shall be conducted while the emissions unit is operating at its maximum capacity of 14 MMBTU/hr and 17 tons per hour of production, unless otherwise specified or approved by the Ohio EPA, NWDO.

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- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emission tests.
 - f. Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.
2. 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. Emissions Limitation:
0.81 pounds PE per hour and 3.55 tons per year of PE

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly mass emission limitation in accordance with the requirements in E.1. of this permit.

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 mass emission limitation, compliance will also be shown with the annual limitation.
 - b. Emissions Limitation:
0.41 pounds PM₁₀ per hour and 1.80 tons per year of PM₁₀

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly mass emission limitation in accordance with the requirements in E.1. of this permit.

The tons per year limitation was developed by multiplying the lb/hr allowable mass

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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 mass emission limitation, compliance will also be shown with the annual limitation.

- c. Emissions Limitation:
 2.24 pounds CO/hour and 9.81 tons CO/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly mass emission limitation in accordance with the requirements in E.1. of this permit.

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 mass emission limitation, compliance will also be shown with the annual limitation.

- d. Emissions Limitation:
 1.41 pounds NO_x/hour and 6.18 tons NO_x/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly mass emission limitation in accordance with the requirements in E.1. of this permit.

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 mass emission limitation, compliance will also be shown with the annual limitation.

- e. Emissions Limitation:
 2.46 pounds OC/hour and 10.77 tons OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying an emission factor derived from the stack testing of 0.154 pounds of OC per ton of product with the maximum product capacity of 16 tons per hour. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4, 18, 25 or 25A as applicable.

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

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will also be shown with the annual limitation.

f. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed 5 percent opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the test methods and procedures specified in US EPA Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None

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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>
P029 - Hammermill grinder and separation plenum (Company ID for this emissions unit is E25)	OAC rule 3745-31-05(A)(3)	0.91 pounds PE per hour; 3.99 tons PE per year*
		Control requirements (see A.2.a)
		Visible particulate emissions shall not exceed 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)	see A.2.b
	OAC rule 3745-31-05(C)	see A.2.c

* All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)

2. Additional Terms and Conditions

- 2.a** Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 gr/dscf.

BAT requirements also include compliance with the terms and conditions of this permit.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2.c This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a baghouse system to a maximum outlet concentration of 0.01 gr/dscf and a maximum mass emission rate of 0.91 pounds per hour.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping 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.

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.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this emission limitation

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shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation:
0.91 pounds PE per hour & 3.99 tons PE per year

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The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 10,611 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation 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.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

None

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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>
P030 - Hammermill grinder and separation plenum (Company ID for this emissions unit is E26)	OAC rule 3745-31-05(A)(3)	0.91 pounds PE per hour; 3.99 tons PE per year*
		Control requirements (see A.2.a)
		Visible particulate emissions shall not exceed 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)	see A.2.b
	OAC rule 3745-31-05(C)	see A.2.c

* All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)

2. Additional Terms and Conditions

- 2.a** Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse control system with a maximum outlet concentration of 0.01 gr/dscf.

BAT requirements also include compliance with the terms and conditions of this permit.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2.c This permit establishes a federally enforceable limitation on particulate emissions for the purpose of having the controlled particulate emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3), by establishing the requirement to have particulate emissions controlled by a baghouse system to a maximum outlet concentration of 0.01 gr/dscf and a maximum mass emission rate of 0.91 pounds per hour.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping 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.

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.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
0.01 gr/dscf from baghouse

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse. If required, compliance with this emission limitation

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shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

- b. Emission Limitation:
0.91 pounds PE per hour & 3.99 tons PE per year

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The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet concentration of 0.01 gr/dscf by a maximum volumetric air flow rate of 10,611 acfm, 60 minutes/hour, and 1 pound/7000 grains. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation 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.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

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>
P032 - Product bin storage with an aeration system (Company ID for this emissions unit is E27)	OAC rule 3745-31-05(A)(3)	0.74 pounds PE per hour; 3.24 tons PE per year* Visible particulate emissions shall not exceed 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	see A.2.a
	OAC rule 3745-17-11(B)	see A.2.b

* All PE is assumed to be particulate matter 10 microns in diameter or less (PM₁₀)

2. **Additional Terms and Conditions**

- 2.a BAT requirements include compliance with the terms and conditions of this permit.
- 2.b The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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None

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None

E. Testing Requirements

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

- a. Emission Limitation:
0.74 pounds PE per hour & 3.24 tons PE per year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation based upon a company supplied outlet emission concentration of 0.008 gr/dscf (derived from a stack test of a similar source) by a maximum volumetric air flow rate of 10,800 acfm, 60 minutes/hour, and 1 pound/7000 grains from all eight product storage bins. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

The tons/yr was developed by multiplying the lb/hr limitation 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:
Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

None