



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WOOD COUNTY**

CERTIFIED MAIL

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: 03-13746

DATE: 8/15/2002

Bakery Feeds
Michael Schmidt
4221 Alexandria Pike
Cold Spring, KY 410761897

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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/15/2002
Effective Date: 8/15/2002**

FINAL PERMIT TO INSTALL 03-13746

Application Number: 03-13746
APS Premise Number: 0387000386
Permit Fee: **\$3000**
Name of Facility: Bakery Feeds
Person to Contact: Michael Schmidt
Address: 4221 Alexandria Pike
Cold Spring, KY 410761897

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12850 Quarry Rd
North Baltimore, Ohio**

Description of proposed emissions unit(s):
Installation of facility to process waste bakery products and residual restaurant cooking oil for animal feed production.

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

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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

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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

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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 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.

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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>
CO	13.62
SO ₂	3.46
NO _x	41.92
VOC	31.27
PE (stack)	13.58
PE (fugitive)	11.92

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>
F001 - Dry blending stock receiving	OAC rule 3745-31-05(A)(3)	0.08 ton fugitive particulate emissions (PE)/year Visible PE from the building enclosure shall not exceed 10% opacity, as a six-minute average See A.I.2.a.
	OAC rule 3745-17-07(B)	See A.I.2.b.
	OAC rule 3745-17-08(B)	See A.I.2.b.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be use of a partial building enclosure and compliance with the terms and conditions of this permit.
- 2.b This emissions unit 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 of OAC rule 3745-17-08(B). 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).

B. Operational Restrictions

- 1. The maximum annual material throughput for this emissions unit shall not exceed 46,000 tons.

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Baker

PTI A

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Emissions Unit ID: **F001**

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the amount (tons per month and total tons, to date for the calendar year) of dry blending stock received.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the partial building enclosure serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, in known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any exceedances of the annual material throughput limitation, as well as the corrective actions that have been taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year.

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Emissions Unit ID: F001

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the partial building enclosure serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
0.08 ton fugitive PE/year

Applicable Compliance Method

The emission limitation was established by multiplying an annual throughput limitation of 46,000 tons dry blending stock and an emission factor of 0.035 lb PE per ton [AP-42 Table 9.9.1-1 (revised 5/98)], applying a control factor of (1- 0.9) for 90% control efficiency for building enclosure and multiplying by a conversion factor of 1 ton/2000 lbs. Therefore provided compliance is shown with the annual throughput limitation, compliance with the ton per year PE limitation will be assumed.

- b. **Emission Limitation**
Visible PE from the building enclosure shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance with the visible emission limitation specified above shall be determined in accordance with 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>
F002 - Railcar/truck finished product loading	OAC rule 3745-31-05(A)(3)	0.04 ton fugitive particulate emissions (PE)/year
		Visible PE from the building enclosure shall not exceed 10% opacity, as a six-minute average for the railcar loadout
		See A.I.2.a.
		Visible PE from the building enclosure shall not exceed 10% opacity, as a six-minute average for the truck loadout
	OAC rule 3745-17-07(B)	See A.I.2.a..
	OAC rule 3745-17-08(B)	See A.I.2.b.
		See A.I.2.b.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be use of a two-sided enclosure for the railcar loadout, a three-sided enclosure for the truck loadout and compliance with the terms and conditions of this permit.

- 2.b** This emissions unit 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 of OAC rule 3745-17-08(B). 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).

B. Operational Restrictions

1. The maximum annual material throughput for this emissions unit shall not exceed 219,000 tons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the amount (tons per month and total tons, to date for the calendar year) of the finished feed material loaded.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the enclosures serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, in known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the

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corrective actions that were taken to eliminate abnormal visible emissions.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any exceedances of the annual material throughput limitation, as well as the corrective actions that have been taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the enclosures serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
0.04 ton fugitive PE/year

Applicable Compliance Method

The emission limitation was established by multiplying an annual throughput limitation of 219,000 tons, an emission factor of 0.0033 lb PE per ton [AP-42, Table 9.9.1-2 (revised 5/98)], applying a control factor of (1-0.9) for 90% control efficiency for use of enclosures, and a conversion factor of 1 ton/2000 lbs. Therefore provided compliance is shown with the annual throughput limitation, compliance with the ton per year PE limitation will be assumed.

- b. **Emission Limitation**
Visible PE from the building enclosure shall not exceed 10% opacity, as a six-minute average for the railcar loadout

Applicable Compliance Method

If required, compliance with the visible emission limitation specified above shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

c. **Emission Limitation**

Visible PE from the building enclosure shall not exceed 10% opacity, as a six-minute average for the truck loadout

Applicable Compliance Method

If required, compliance with the visible emission limitation specified above shall be determined in accordance with 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>	
		OAC rule 3745-17-07 (B)
		OAC rule 3745-17-08 (A)
F003 -Roadways and parking areas (new)	OAC rule 3745-31-05 (A)(3)	
paved roadways and parking areas (see section A.1.2.c)	OAC rule 3745-31-05 (A)(3)	
	OAC rule 3745-17-07 (B)	
	OAC rule 3745-17-08 (A)	
unpaved roadways (see section A.1.2.d)	OAC rule 3745-31-05 (A)(3)	

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Emissions Unit ID: F003

Applicable Emissions
Limitations/Control Measures

11.80 tons of PE/year (fugitive)

No visible PE except for one minute during any 60-minute period

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c, A.2.e, A.2.g, A.2.i, A.2.j, and A.2.k)

See A.I.2.b.

See A.I.2.a.

No visible PE except for three minutes during any 60-minute period

best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d, A.2.f, A.2.g., A.2.h, A.2.i, A.2.j, and A.2.k)

See A.I.2.b.

See A.I.2.a.

2. Additional Terms and Conditions

2.a This emissions unit 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 of OAC rule 3745-17-08(B).

- 2.b** 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.c** The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
- paved roadways and parking areas:
- RS-2- 0.09 miles as specified by the PTI application
- RS-3- 0.15 miles as specified by the PTI application
- RS-4- 0.15 miles as specified by the PTI application
- P-1- 0.10 miles as specified by the PTI application
- P-2- 0.03 miles as specified by the PTI application
- 2.d** The unpaved roadways that are covered by this permit and subject to the above-mentioned requirements are listed below:
- unpaved roadways:
- RS-1- 0.17 miles as specified by the PTI application
- 2.e** In accordance with the permit application, the permittee maintains that uncontrolled fugitive dust from paved surfaces will comply with all applicable requirements. If at any time uncontrolled fugitive dust emissions do not meet the above applicable requirements the permittee shall employ best available control measures to ensure compliance.
- 2.f** The permittee shall employ best available control measures on all unpaved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways with water or chemical suppression at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.g** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit.

Implementation of the control measures shall not be necessary for paved roadways and parking areas or unpaved roadways that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- 2.h** Any unpaved roadway, which during the term of this permit is paved or takes on the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.i** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.j** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.k** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
RS-2	daily

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RS-3	daily
RS-4	daily
P-1	daily
P-2	daily
<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
RS-1	daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the Northwest District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (I) the paved roadways and parking

areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. 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 limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation:**
11.80 tons of fugitive PE/year

Applicable Compliance Method:

The emission limitation was developed by multiplying the maximum potential uncontrolled emission rate for paved roadways and parking areas and unpaved roadways by AP-42 emission factors in lbs PE per vehicle mile traveled (VMT) (AP-42, Section 13.2.2 , 9/98 and AP-42 Section 13.2.1.3, 10/97) and the following maximum paved and unpaved VMT:

paved parking -	1.80 miles for mean vehicle weight of 28.55 tons 1.20 miles for mean vehicle weight of 2.89 tons
paved roadways -	3.42 miles for mean vehicle weight of 2.89 tons 2.70 miles for mean vehicle weight of 28.55 tons 2.70 miles for mean vehicle weight of 28.55 tons
unpaved roadways-	9.52 miles for mean vehicle weight of 11.75 tons

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Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures when appropriate, compliance with the ton per year PE limitation will be assumed.

b. **Emission Limitation:**

No visible PE except for a period of time not to exceed one minute during any 60-minute observation period from paved roadways and parking areas

Applicable Compliance Method:

Compliance with the visible emission limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(1) through (B)(4)(d) of OAC rule 3745-17-03.

c. **Emission Limitation:**

No visible PE except for a period of time not to exceed three minutes during any 60-minute observation period from unpaved roadways

Applicable Compliance Method:

Compliance with the visible emission limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(1) through (B)(4)(d) of OAC rule 3745-17-03.

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>	OAC rule 3745-17-07(A)
P001 - Scrap bakery product processing line (hammermill, 25 TPH rotating drum, 26 mmBtu/hr sawdust and packaging material fired burner, hammermill, screens, screw conveyors, product recovery cyclones and paper separation cyclones) (new)	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-11(A)	

Applicable Emissions
Limitations/Control Measures

Use of a regenerative thermal oxidizer (RTO) (see A.I.2.a)

7.14 lbs volatile organic compounds (VOC)/hour, 31.27 tons VOC/year

9.57 lbs nitrogen oxides (NOx)/hour, 41.92 tons NOx/year

3.11 lbs carbon monoxide (CO)/hour, 13.62 tons CO/year

3.10 lbs particulate emissions (PE)/hour, 13.58 tons PE/year

0.79 lb sulfur dioxide (SO₂)/hour, 3.46 tons SO₂/year

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average from stack serving RTO

No visible particulate emissions from building enclosure

See A.1.2.b.

See A.I.2.b.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be use of a regenerative thermal oxidizer for VOC control. The regenerative thermal oxidizer shall meet a minimum control efficiency of 95% (100% capture).
- 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).

B. Operational Restrictions

- 1. The permit to install for this emissions unit was evaluated based on the raw materials consisting of sawdust, packaging materials, wheat midds and bakery by-products. Bakery by-products consist of breads, pizza/pasta, cookies/crackers, cereals, jellies, candies, and other grain based materials. Prior to any change (or any other physical change in, or change in the method of operation) in raw materials, the permittee shall conduct an evaluation to determine if the change would constitute a "modification" as defined in OAC rule 3745-31-01(VV). If the change(s) in raw materials or any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final permit to install modification prior to the change. The permittee shall collect, record and retain any information and the final determination when modification evaluations are performed.
- 2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the

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thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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 180 days following start-up of emissions unit P001.

- b. The emission testing shall be conducted to demonstrate compliance with the 95% VOC control efficiency and 100% VOC capture efficiency. Emission testing shall also be conducted to demonstrate compliance with lb/hr limitations for PE, CO, SO₂, NO_x, and VOC.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; for SO₂, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A; for NO_x, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A; for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A; and for VOC, Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the control efficiency for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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Personnel from the appropriate Ohio EPA District Office or local air agency 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
7.14 lbs VOC/hour and 31.27 tons VOC/year

Applicable Compliance Method

Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25 or 25A (see Section E.1.).

The permittee shall demonstrate compliance with the annual limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

- b. **Emission Limitation**
9.57 lbs NOx/hour and 41.92 tons NOx/year

Applicable Compliance Method

Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 7 (see Section E.1.).

The permittee shall demonstrate compliance with the annual limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

- c. **Emission Limitation**
3.11 lbs CO/hour and 13.62 tons CO/year

Applicable Compliance Method

Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 10 (see Section E.1.).

The permittee shall demonstrate compliance with the annual limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

- d. **Emission Limitation**
3.10 lbs PE/hour and 13.58 tons PE/year

Applicable Compliance Method

Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-5 (see Section E.1.).

The permittee shall demonstrate compliance with the annual limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

- e. **Emission Limitation**
0.79 lb SO₂/hour and 3.46 tons SO₂/year

Applicable Compliance Method

Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 6 (see Section E.1.).

The permittee shall demonstrate compliance with the annual limitation by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual limitation.

- f. **Emission Limitation**
Visible PE shall not exceed 0% opacity, as a six-minute average from stack serving RTO

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- g. **Emission Limitation:**
No visible PE from building enclosure

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22.

F. Miscellaneous Requirements

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None