



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
WYANDOT COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-13687**

**Fac ID: 0388010003**

**DATE: 10/4/2007**

Endres Processing Ohio LLC  
Gary Ehlers  
13420 Courthouse Boulevard  
Rosemount, MN 43351

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

NWDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 10/4/2007  
Effective Date: 10/4/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13687

Application Number: 03-13687  
Facility ID: 0388010003  
Permit Fee: **\$1000**  
Name of Facility: Endres Processing Ohio LLC  
Person to Contact: Gary Ehlers  
Address: 13420 Courthouse Boulevard  
Rosemount, MN 43351

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

**7150 State Highway 199 N.  
Upper Sandusky, Ohio**

Description of proposed emissions unit(s):

**Administrative modification to change various raw material streams that can be received and processed at facility.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

#### 4. Title IV Provisions

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

#### 5. Severability Clause

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

#### 6. General Requirements

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

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## **7. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### 10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

#### 11. 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.

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**12. 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.

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit 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 of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. 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>
NOx	97.83
CO	61.01
VOC	35.83
PE (stack)	1.48
PE (fugitive)	17.55

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**Endre**

**PTI A**

**Modification Issued: 10/4/2007**

Emissions Unit ID: F001

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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 - Wheat midd receiving and storage	OAC rule 3745-31-05(A)(3)	0.47 ton fugitive particulate emissions (PE)/year  Visible fugitive PE from the building enclosure shall not exceed 10% opacity, as a six-minute average  see Section A.I.2.c.
	OAC rule 3745-17-07 (B)	see Section A.I.2.b.
	OAC rule 3745-17-08 (A)	see Section 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 PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c Best available technology (BAT) for this emissions unit has been determined to be use of a total building enclosure and compliance with the terms and conditions specified in Part III sections A.I. and A.II.

**II. Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 23,530 tons of wheat midds.

### III. 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 wheat midds received.
2. The permittee shall perform daily checks, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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 emissions; and
  - e. any corrective actions taken to minimize the visible emissions.

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

### IV. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual wheat midd throughput limitations, as well as the corrective actions that

**Endre****PTI A****Modification Issued: 10/4/2007**

Emissions Unit ID: F001

were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar 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 egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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.

## V. Testing Requirements

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

- a. Emission Limitation  
0.47 ton fugitive PE/year

### Applicable Compliance Method

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for building enclosure to a maximum uncontrolled emission rate of 1.39 tons PE per year for activities within the building and no control efficiency for 0.05 tons PE per year from the storage silo outside the building. The maximum uncontrolled emission rate was calculated by multiplying the appropriate AP-42 emissions factor (lb PE/ton) from AP-42 Tables 9.9.1-1 and 9.9.1-2 (revised 5/98), a total maximum material handling throughput (tons per year for each component of this emissions unit) and a conversion factor of 1 ton/2000 lbs. The total uncontrolled emissions rate is based on the following AP-42 Emissions Factors and throughputs for distinct material handling operations:

Truck Unloading - 23,530 tons/yr x 0.017 lb/ton (Table 9.9.1-2 animal feed)  
Storage Pile Load-Out to Hopper/Auger - 15,647 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)  
Storage Silo Vents Inside Building - 15,647 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)  
Storage Silo vents Outside Building - 15,647 tons/yr x 0.061 lb/ton (Table

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Emissions Unit ID: F001

9.9.1-1 internal handling)

Storage Pile Load-Out - 7,883 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput of 23,530 tons of wheat midds. Therefore, provided compliance is shown with this annual throughput limitation, compliance with the ton per year PE limitation for this emissions unit will be assumed.

**b. Emission Limitation**

Visible fugitive 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.

**VI. Miscellaneous Requirements**

None

**Endre**

**PTI A**

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Emissions Unit ID: F001

**B. State Only Enforceable Section**

**I. 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 - Wheat midd receiving and storage	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Endre

PTI A

Modification Issued: 10/4/2007

Emissions Unit ID: F002

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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 - Raw material mixing and storage operations	OAC rule 3745-31-05(A)(3)	1.62 tons fugitive particulate emissions (PE)/year  Visible fugitive PE from the building enclosure shall not exceed 10% opacity, as a six-minute average  see Section A.I.2.c.
	OAC rule 3745-17-07(B)	see Section A.I.2.b.
	OAC rule 3745-17-08(A)	see Section 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 PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c Best available technology (BAT) for this emissions unit has been determined to be use of a total building enclosure and compliance with the terms and conditions specified in Part III sections A.I. and A.II.

## II. Operational Restrictions

1. The maximum annual throughput for this emissions unit shall not exceed 163,800 tons of raw material, including wheat midds.

## III. 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 raw material, including wheat midd processed through this emissions unit.
2. The permittee shall perform daily checks, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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 emissions; and
  - e. any corrective actions taken to minimize the visible emissions.

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

3. The permit to install for this emissions unit was evaluated based on the raw materials anticipated to be received, mixed and stored at the facility. The raw material streams to be received at the facility include food by-products, grain-based materials, snack

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Emissions Unit ID: F002

products, solid and/or liquid processed dairy foods, agricultural by-products and bakery by-products, which include breads, pizza, pasta, cookies, crackers, cereals, jellies and candies. . 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-

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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.

#### **IV. Reporting Requirements**

1. The permittee shall submit annual reports which identify any exceedances of the annual raw material throughput limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar 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 egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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.

#### **V. Testing Requirements**

1. 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:  
1.62 tons fugitive PE/year

Applicable Compliance Method:

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for building enclosure to a maximum uncontrolled emission rate of 5.39 tons PE per year. The maximum uncontrolled emission rate was calculated by multiplying the appropriate AP-42 emissions factor (lb PE/ton) from AP-42 Tables 9.9.1-1 and 9.9.1-2 (revised 5/98), a total maximum material handling throughput (tons per year for each component of this emissions unit), an adjustment factor of 1 - 53.36% (the percentage of incoming raw materials that have a moisture content high enough to prevent PE) and a

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conversion factor of 1 ton/2000 lbs. The total uncontrolled emissions rate is based on the following AP-42 Emissions Factors and throughputs for distinct material handling operations:

Bulk Material Unloading - 155,917 tons/yr x 0.017 lb/ton (Table 9.9.1-2 animal feed)

Wheat Midds Addition - 7,883 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

Mixing (w/front loader) - 163,800 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

Material Load-Out - 163,800 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput of 163,800 tons of raw material, including wheat midds. Therefore, provided compliance is shown with this annual throughput limitation, compliance with the ton per year PE limitation for this emissions unit will be assumed.

b. Emission Limitation:

Visible fugitive 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.

## VI. Miscellaneous Requirements

None

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Emissions Unit ID: F002

**B. State Only Enforceable Section****I. 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 - Raw material mixing and storage operations	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: F003

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
F003 - Raw material grinding and conveyance	OAC rule 3745-31-05(A)(3)	2.80 tons fugitive particulate emissions (PE)/year  Visible fugitive PE from the building enclosure shall not exceed 10% opacity, as a six-minute average  see Section A.I.2.c.
	OAC rule 3745-17-07(B)	see Section A.I.2.b.
	OAC rule 3745-17-08(A)	see Section 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 PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c Best available technology (BAT) for this emissions unit has been determined to be use of a total building enclosure and compliance with the terms and conditions specified in Part III sections A.I. and A.II.

## II. Operational Restrictions

1. The maximum annual throughput for this emissions unit shall not exceed 163,800 tons of raw material, including wheat midds.

## III. 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 raw material, including wheat midds, processed through this emissions unit.
2. The permittee shall perform daily checks, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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 emissions; and
  - e. any corrective actions taken to minimize the visible emissions.

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

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operate under normal conditions, or specify the corrective actions that were taken to minimize abnormal visible emissions.

3. The permit to install for this emissions unit was evaluated based on the raw materials anticipated to be received, mixed and stored at the facility. The raw material streams to be received at the facility include food by-products, grain-based materials, snack products, solid and/or liquid processed dairy foods, agricultural by-products and bakery by-products, which include breads, pizza, pasta, cookies, crackers, cereals, jellies and candies. . 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-

Emissions Unit ID: F003

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.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual raw material throughput limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar 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 egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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.

#### V. Testing Requirements

1. 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:  
2.80 tons fugitive PE/year

Applicable Compliance Method:

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for building enclosure to a maximum uncontrolled emission rate of 9.32 tons PE per year. The maximum uncontrolled emission rate was calculated by multiplying an emission factor of 0.061 lb PE per ton from AP-42 Table 9.9.1-2 (revised 5/98), a total maximum material handling throughput (tons per year for each component of this emissions unit), an adjustment factor of 1 - 53.36% (the percentage of incoming raw materials that have a moisture content high enough to prevent PE) and a conversion factor of 1 ton/2000 lbs. The total uncontrolled emissions rate is based on the following throughputs for distinct material handling operations:

Bulk Material Load-In - 163,800 tons/yr  
 Conveyor 1 to Grinder - 163,800 tons/yr

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Grinder Vent - 163,800 tons/yr

Conveyor 2 to Surge Hopper - 163,800 tons/yr

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput of 163,800 for emissions unit F002, raw material mixing and storage operations. Therefore, provided compliance is shown with the annual throughput for emissions unit F002, compliance with the ton per year PE limitation for this emissions unit will be assumed.

- b. Emission Limitation:  
Visible fugitive 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.

## VI. Miscellaneous Requirements

None

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Emissions Unit ID: F003

**B. State Only Enforceable Section****I. 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>
F003 - Raw material grinding and conveyance	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
F004 - Finished feed processing and handling	OAC rule 3745-31-05(A)(3)	1.30 tons fugitive particulate emissions (PE)/year
		Visible fugitive PE from the building enclosure shall not exceed 10% opacity, as a six-minute average
		see Section A.I.2.c.
	OAC rule 3745-17-07(B)	see Section A.I.2.b.
	OAC rule 3745-17-08(A)	see Section 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 PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c Best available technology (BAT) for this emissions unit has been determined to be use of a total building enclosure and compliance with the terms and conditions specified in Part III sections AENEID A.II.

**II. Operational Restrictions**

None

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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 emissions; and
  - e. any corrective actions taken to minimize the visible emissions.

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

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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

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31 and July 31 of each year and shall cover the previous 6-month period.

**V. Testing Requirements**

1. 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):

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- a. Emission Limitation:  
1.30 tons fugitive PE/year

Applicable Compliance Method:

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for building enclosure to a maximum uncontrolled emission rate of 4.34 tons PE per year. The maximum uncontrolled emission rate was calculated by multiplying an emission factor of 0.061 lb PE per ton from AP-42 Table 9.9.1-2 (revised 5/98), a total maximum material handling throughput (tons per year for each component of this emissions unit) and a conversion factor of 1 ton/2000 lbs. The total uncontrolled emission rate is based on the following throughputs for distinct material handling operations:

Hammermill - 5,226 tons/yr  
Sifter #3 - 5,226 tons/yr  
Bucket elevator - 129,604 tons/yr  
Sifter #3 recycle to conveyor - 1,040 tons/yr  
Recycle conveyor to storage pile - 1,040 tons/yr

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput of 163,800 for emissions unit F002, raw material mixing and storage operations. Therefore, provided compliance is shown with the annual throughput for emissions unit F002, compliance with the ton per year PE limitation for this emissions unit will be assumed.

- b. Emission Limitation:  
Visible fugitive 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.

## VI. Miscellaneous Requirements

None

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Emissions Unit ID: F004

**B. State Only Enforceable Section****I. 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>
F004 - Finished feed processing and handling	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: F005

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
F005 - Finished feed storage piles	OAC rule 3745-31-05(A)(3)	3.53 tons fugitive particulate emissions (PE)/year
		Visible fugitive PE from the building enclosure shall not exceed 10% opacity, as a six-minute average
		see Section A.I.2.c.
	OAC rule 3745-17-07(B)	see Section A.I.2.b.
	OAC rule 3745-17-08(A)	see Section 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 PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c Best available technology (BAT) for this emissions unit has been determined to be use of a total building enclosure and compliance with the terms and conditions specified in Part III sections AENEID A.II.

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**II. Operational Restrictions**

None

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Emissions Unit ID: F005

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall perform daily checks, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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 emissions; and
  - e. any corrective actions taken to minimize the visible emissions.

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

**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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

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31 and July 31 of each year and shall cover the previous 6-month period.

**V. Testing Requirements**

1. 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):

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- a. Emission Limitation:  
3.53 tons fugitive PE/year

Applicable Compliance Method

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for building enclosure to a maximum uncontrolled emission rate of 11.76 tons PE per year. The maximum uncontrolled emission rate was calculated by multiplying the appropriate AP-42 emissions factor (lb PE/ton) from AP-42 Tables 9.9.1-1 (revised 5/98), a total maximum material handling throughput (tons per year for each component of this emissions unit), and a conversion factor of 1 ton/2000 lbs. The total uncontrolled emissions rate is based on the following AP-42 Emissions Factors and throughputs for distinct material handling operations:

Finished Feed from Bucket Elevator - 129,604 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

Finished Feed Load-Out (back of building) - 126,494 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

Load-In to under floor hopper - 126,494 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

Finished Feed Load-Out (front of building) - 3,111 tons/yr x 0.061 lb/ton (Table 9.9.1-1 internal handling)

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput of 163,800 tons of raw material, including wheat midds. Therefore, provided compliance is shown with this annual throughput limitation, compliance with the ton per year PE limitation for this emissions unit will be assumed.

- b. Emission Limitation:  
Visible fugitive 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.

## **VI. Miscellaneous Requirements**

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None

**B. State Only Enforceable Section**

**I. 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>
F005 - Finished feed storage piles	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: F006

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
F006 - Finished feed loading (2-enclosed truck loading stations and 1-outside truck/railcar loading station)	OAC rule 3745-31-05(A)(3)	0.24 ton fugitive particulate emissions (PE)/year
		Visible emission restrictions (see Section A.I.2.d)
	OAC rule 3745-17-07(B)	see Section A.I.2.c.
	OAC rule 3745-17-08(A)	see Section A.I.2.b.
		see Section 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 PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c Loading operations consist of two truck loading stations and one truck/railcar loading station. Best available technology (BAT) for this emissions unit has been determined to be use of a total building enclosure for the two stations where only truck loading is performed. BAT also includes compliance with the

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terms and conditions specified in Part III sections AENEID A.II

- 2.d** Visible fugitive PE from the building enclosure for the two stations where only truck loading is performed shall not exceed 10% opacity, as a six-minute average. Visible fugitive PE from the truck/railcar loading station (not enclosed) shall not exceed 10% opacity, as a six-minute average.

## **II. Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 145,334 tons of finished feed material .

## **III. 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, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) from the building enclosure serving the truck loading stations and for any visible fugitive particulate emissions from the outside truck/railcar loading station. 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 emissions; and
  - e. any corrective actions taken to minimize the visible emissions.

The observer does not have to document the exact start and end times for the visible emissions observed under item (d) above or continue the daily check until the visible emissions are no longer observed. The observer may indicate that the visible

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emissions were continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to minimize abnormal visible emissions.

#### IV. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any exceedances of the annual finished feed 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 egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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.

#### V. Testing Requirements

1. 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  
 0.24 ton fugitive PE/year  
  
Applicable Compliance Method  
 The tons PE/year emission limitation was established by multiplying an annual throughput limitation of 145,334 tons, an emission factor of 0.0033 lb PE per ton from AP-42 Table 9.9.1-2 (revised 5/98), 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 fugitive PE from the building enclosure for the two stations where only truck loading is performed shall not exceed 10% opacity, as a six-minute average. Visible fugitive PE from the truck/railcar loading station (not enclosed) shall not exceed 10% opacity, as a six-minute average.

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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.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. 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>
F006 - Finished feed truck loading (2-enclosed truck loading stations and 1- outside truck/railcar loading station)	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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**Facility ID: 0388010003**

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None

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Emissions Unit ID: F007

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
F007 - Unpaved roadways and parking areas (see Section A.1.2.c)	OAC rule 3745-31-05(A)(3)	1.29 tons fugitive particulate emissions (PE)/year  no visible PE except for 3 minutes during any 60-minute period  best available control measures that are sufficient to minimize visible emissions of fugitive dust (see Sections A.2.d through A.2.i)
	OAC rule 3745-17-07(B)	see Section A.I.2.b
	OAC rule 3745-17-08(A)	see Section 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 PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c The unpaved roadways and parking areas that are covered by this permit and

subject to the above-mentioned requirements are listed below:

unpaved roadways:

Raw material receiving #1

Raw material receiving #2

Wheat midd receiving

Sawdust receiving

Finished feed load #1

unpaved parking areas:

Employee parking

- 2.d** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the applicable requirements. If the inherent moisture content of the unpaved roadway or parking area is reduced to a point where the unpaved roadway or parking area cannot maintain compliance with the visible PE limitation established under OAC rule 3745-31-05, then the permittee shall employ watering or chemical suppression. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The frequency 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 a paved roadway 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.f** Any unpaved roadway or parking area, 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.g** 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.h** 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.i** 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.

## **II. Operational Restrictions**

None

## **III. Monitoring and/or Recordkeeping Requirements**

1. Except as otherwise provided in this section, the permittee shall perform daily inspections, Monday through Friday except on holidays, of each of the roadway segments and parking areas.
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 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

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that less frequent inspections would be sufficient to ensure compliance with the applicable visible PE 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 when snow and/or ice cover or precipitation were sufficient to not require the inspection.

The information required in 4.d. shall be kept for 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.

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**IV. 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.

**V. Testing Requirements**

1. 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:  
1.29 tons of fugitive PE/year  
  
Applicable Compliance Method:  
Compliance with the tons PE/year emission limitation shall be determined by using the equation(s) and methods in AP-42, Section 13.2.2, "Unpaved Roads" (9/98) to calculate maximum uncontrolled emissions and assuming that compliance with the visible emission limitation results in a 95% control efficiency. Therefore, provided compliance is shown with the visible emissions limitation requirements of this permit, 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 3 minutes during any 60-minute observation period from unpaved 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

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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.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. 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>
F007 - Unpaved roadways and parking areas	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P901 - Animal feed dryer and processing line 1 (modification to PTI 03-10060, issued on 3/26/97. This modification is to correct past permit allowable deficiencies. Emission unit formerly permitted as P001.)	OAC rule 3745-31-10 through 20  OAC rule 3745-31-05(A)(3)  OAC rule 3745-31-05(D)  OAC rule 3745-17-11(A)  OAC rule 3745-17-07(A)  OAC rule 3745-17-08(A)  OAC rule 3745-17-07(B)

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<u>Applicable Emissions Limitations/Control Measures</u>	
see Section A.I.2.a.	Visible fugitive PE from the building enclosure shall not exceed 10% opacity as a six-minute average
35.83 lbs nitrogen oxides (NOx)/hour combined with emission unit P902	see Section A.I.2.d. 97.83 tons NOx per rolling, 12-month period combined with emission unit P902
13.11 lbs volatile organic compounds (VOC)/hour, 35.83 tons VOC per rolling, 12-month period combined with emission unit P902	see Section A.I.2.c.  see Section A.I.2.b.  see Section A.I.2.b.
<u>Combined Limitations with Emission Unit P902:</u>	see Section A.I.2.e.
0.15 lb particulate emissions (PE)/hour, 0.42 ton PE/year	see Section A.I.2.f.
see Section A.I.2.g.	
22.09 lbs carbon monoxide (CO)/hour, 61.01 tons CO/year	
Visible PE shall not exceed 0% opacity as a six-minute average from the regenerative thermal oxidizer (RTO) except during RTO burn-out when visible PE shall not exceed 20% opacity as a six-minute average	
4.16 tons fugitive PE/year	

**Modification Issued: 10/4/2007****2. Additional Terms and Conditions**

- 2.a** The permittee shall apply "Best Available Control Technology" (BACT) on this emissions unit. Based on the "Prevention of Significant Deterioration" (PSD) analysis BACT has been determined to be the use of a regenerative thermal oxidizer (RTO) for VOC control.

The RTO shall meet the following requirements for VOC emissions from emission units P901 and P902, combined:

- i. minimum VOC destruction efficiency of 95%.

The PSD analysis determined that no control methods are cost-effective for BACT for NOx emissions.

- 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** The permittee has requested federally enforceable limitations for emissions units P901 and P902 combined, of 97.83 tons of NOx, per rolling 12-month period, based on an annual sawdust fuel usage restriction for the purpose of limiting potential to emit (see A.II.3).
- 2.d** The requirements of this rule include compliance with OAC rule 3745-31-05(D) and OAC rules 3745-31-10 through 20.
- 2.e** 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.f** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.g** Best available technology (BAT) for this emission unit has been determined to be the use of an RTO with a maximum mass emission rate of 0.14 lb PE/hr from emission units P901 and P902 combined.

Best available technology (BAT) for this emissions unit has also been determined to be use of a total building enclosure and compliance with the terms and conditions specified in Part III sections AENEID A.II.

## II. Operational Restrictions

1. The permit to install for this emissions unit was evaluated based on the raw materials consisting of sawdust, 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.
3. The maximum annual finished feed production for emissions units P901 and P902 combined shall not exceed 129,604 tons per year, based upon a rolling, 12-month summation and the maximum annual sawdust fuel usage for emissions units P901 and P902 combined shall not exceed 10,646 tons per year, based upon a rolling, 12-month summation. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Finished Feed Production (tons)	Maximum Allowable Sawdust Fuel Usage (tons)
1	15,000	1,200
1-2	30,000	2,500
1-3	41,000	3,400
1-4	52,000	4,300
1-5	63,000	5,200
1-6	74,000	6,100
1-7	85,000	7,000
1-8	96,000	7,900
1-9	107,000	8,800
1-10	118,000	9,700
1-11	129,000	10,600
1-12	129,604	10,646

After the first 12 calendar months of operation following the issuance of this permit,

compliance with the annual finished feed production and sawdust fuel usage limitations shall be based upon a rolling, 12-month summation.

### III. 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 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, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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 emissions; and

- e. any corrective actions taken to minimize the visible emissions.

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

- 3. The permittee shall maintain monthly records of the following information for emission units P901 and P902, combined:
  - a. tons of finished product produced and tons of sawdust burned;
  - b. during the first 12 calendar months of operation, the cumulative total tons of finished product produced and tons of sawdust burned;
  - c. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the tons of finished product produced and tons of sawdust burned;
  - d. the calculated monthly emission rate for NO<sub>x</sub> using the following equation:  
  
NO<sub>x</sub> emissions in tons = (tons of sawdust burned) x (an emissions factor of pounds of NO<sub>x</sub> emissions per ton of sawdust burned as established by the most recent performance test accepted by the Ohio EPA) + 0.111 ton NO<sub>x</sub> per month from continuous RTO operation
  - e. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for NO<sub>x</sub>, in tons.

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- f. the calculated monthly emission rate for VOC using the following equation:  
  
VOC emissions in tons = (tons of finished product produced) x (an emissions factor of pounds of VOC emissions per ton of finished product as established by the most recent performance test accepted by the Ohio EPA) x (1 - destruction efficiency for the RTO)
- g. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for VOC, in tons.

**IV. 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 particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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.
3. The permittee shall submit deviation (excursion) reports which identify the following exceedances:
  - a. the rolling, 12-month tons of finished product produced and tons of sawdust burned operating limitation;
  - b. for the first 12 calendar months of operation following the issuance of the permit, all exceedances of the maximum allowable cumulative tons of finished product produced and tons of sawdust burned limitations;
  - c. the rolling, 12-month NO<sub>x</sub> emissions; and
  - d. the rolling, 12-month VOC emissions.

These deviation (excursion) reports shall be submitted in accordance with the general

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terms and conditions of this permit.

4. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual, combined finished feed throughput limitation, as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

## V. 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 in accordance with all time lines established in the terms of the negotiated Consent Order.
  - b. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency requirements and the lb/hr limitations for VOC and the lb/hr limitations for PE, NO<sub>x</sub> and CO.
  - 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 NO<sub>x</sub>, 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 destruction efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. 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 emissions units P901 and P902 are operating at or near their maximum combined capacity of 30 tons/hour , 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

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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).

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

0.15 lb PE/hour and 0.42 ton PE/year, combined for emission units P901 and P902

Applicable Compliance Method

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

The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pounds PE per ton of finished product (as established by the most recent performance test accepted by the Ohio EPA) by the actual tons of finished product and dividing by 2000 lb per ton.

- b. Emission Limitation

13.11 lbs VOC/hour and 35.83 tons VOC per rolling, 12-month period for emission units P901 and P902, combined

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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 Testing Requirements in Section A.V.1).

The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pounds of VOC per ton of finished product produced (as established by the most recent performance test accepted by the Ohio EPA) by the actual tons of finished product produced and dividing by 2000 lb per ton.

c. Emission Limitation

22.09 lbs CO/hour and 61.01 tons CO/year, combined for emission units P901 and P902

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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 Testing Requirements in Section A.V.1).

The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pounds CO per ton of sawdust burned (as established by the most recent performance test accepted by the Ohio EPA) by the actual tons of sawdust burned and dividing by 2000 lb per ton.

d. Emission Limitation

35.83 lbs NOx/hour and 97.83 tons NOx per rolling, 12-month period for emission units P901 and P902, combined

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 Testing Requirements in Section A.V.1).

The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pound NOx per ton of sawdust burned (as established by the most recent performance test accepted by the Ohio EPA) by the actual tons of sawdust burned and dividing by 2000 lb per ton.

e. Emission Limitation

Visible PE shall not exceed 0% opacity as a six-minute average from the regenerative thermal oxidizer (RTO) except during burn-out when visible PE shall not exceed 20% opacity as a six-minute average

Applicable Compliance Method

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

f. Emission Limitation

4.16 tons fugitive PE/year

Applicable Compliance Method

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for building enclosure to a maximum uncontrolled emission rate of 13.85 tons PE per year. The maximum

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uncontrolled emission rate was calculated by multiplying an emission factor of 0.061 lb PE per ton from AP-42 Table 9.9.1-2, (revised 5/98), a total maximum material handling throughput of tons per year for each component of this emissions unit and a conversion factor of 1 ton/2000 lbs. The total uncontrolled emission rate is based on the following throughputs for distinct material handling operations:

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Drop-out box to conveyor - 129,604 tons/yr  
Cyclone conveyor to sifter conveyor - 129,604 tons/yr  
Sifter #1 and Sifter #2- 129,604 tons/yr  
Sifter #2 drop-out to bucket elevator - 62,709 tons/yr  
Sifter #2 drop-out to hammermill - 2,613 tons/yr

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput of 163,800 for emissions unit F002, raw material mixing and storage operations. Therefore provided compliance is shown with the annual throughput for emissions unit F002, compliance with the ton per year PE limitation for this emissions unit will be assumed.

- g. Emission Limitation:  
Visible fugitive 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.

- h. Emission Limitation:  
The maximum annual finished product produced and the maximum annual sawdust fuel usage for emissions units P901 and P902 combined, shall not exceed 129,604 tons and 10,646 tons per year, respectively, based upon a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance by the monitoring and record keeping in Section A.III.1.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P901 - Animal feed dryer and processing line 1 (modification to PTI 03-10060, issued on 3/26/97. This modification is to correct past permit allowable deficiencies. Emission unit formally permitted as P001.)	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for emissions units P901 and P902 was evaluated based on the actual materials (typically bakery by-products) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: ethanol

TLV (mg/m<sup>3</sup>): 1884.25

Maximum Hourly Emission Rate (lbs/hr): 13.11\*

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 66.78

MAGLC (ug/m<sup>3</sup>): 44863

\*Maximum hourly emission rate is the combined emission rate from P901 and P902 vented through a regenerative thermal oxidizer.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under

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OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: P902

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>	
P902 - Animal feed dryer and processing line 2 (modification to PTI 03-10060, issued on 3/26/97. This modification is to correct past permit allowable deficiencies. Emission unit formerly permitted as P002.)	OAC rule 3745-31-10 through 20	
	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(D)
		OAC rule 3745-17-11(A)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-08(A)
		OAC rule 3745-17-07(B)

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<u>Applicable Emissions Limitations/Control Measures</u>	Visible fugitive PE from the building enclosure shall not exceed 10% opacity as a six-minute average
see Section A.I.2.a.	see Section A.I.2.d.
35.83 lbs nitrogen oxides (NOx)/hour combined with emission unit P901	97.83 tons NOx per rolling, 12-month period combined with emission unit P902 see Section A.2.d.
13.11 lbs volatile organic compounds (VOC)/hour, 35.83 tons VOC per rolling, 12-month period combined with emission unit P902	see Section A.I.2.c.
<u>Combined Limitations with Emission Unit P901:</u>	see Section A.I.2.b
0.15 lb particulate emissions (PE)/hour, 0.42 ton PE/year	see Section A.I.2.b.
see Section A.I.2.g.	see Section A.I.2.e.
22.09 lbs carbon monoxide (CO)/hour, 61.01 tons CO/year	see Section A.I.2.f.
Visible PE shall not exceed 0% opacity as a six-minute average from the regenerative thermal oxidizer (RTO) except during RTO burn-out when visible PE shall not exceed 20% opacity as a six-minute average	
4.16 tons fugitive PE/year	

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## 2. Additional Terms and Conditions

- 2.a** The permittee shall apply "Best Available Control Technology" (BACT) on this emissions unit. Based on the "Prevention of Significant Deterioration" (PSD) analysis BACT has been determined to be the use of a regenerative thermal oxidizer (RTO) for VOC control.

The RTO shall meet the following requirements for VOC emissions from emission units P901 and P902, combined:

- i. minimum VOC destruction efficiency of 95%.

The PSD analysis determined that no control methods are cost-effective for BACT for NOx emissions.

- 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** The permittee has requested federally enforceable limitations for emissions units P901 and P902 combined, of 97.83 tons of NOx, per rolling 12-month period, based on an annual fuel usage restriction for the purpose of limiting potential to emit (see A.II.3).
- 2.d** The requirements of this rule include compliance with OAC rule 3745-31-05(D) and OAC rules 3745-31-10 through 20.
- 2.e** 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.f** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.g** Best available technology (BAT) for this emission unit has been determined to be the use of an RTO with a maximum mass emission rate of 0.14 lb PE/hr from emission units P901 and P902 combined.

Best available technology (BAT) for this emissions unit has also been determined to be use of a total building enclosure and compliance with the terms and conditions specified in Part III sections AENEID A.II.

## II. Operational Restrictions

1. The permit to install for this emissions unit was evaluated based on the raw materials consisting of sawdust, 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.
3. The maximum annual finished feed production for emissions units P901 and P902 combined shall not exceed 129,604 tons per year, based upon a rolling, 12-month summation and the maximum annual sawdust fuel usage for emissions units P901 and P902 combined shall not exceed 10,646 tons per year, based upon a rolling, 12-month summation. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Finished Feed Production (tons)	Maximum Allowable Sawdust Fuel Usage (tons)
1	15,000	1,200
1-2	30,000	2,500
1-3	41,000	3,400
1-4	52,000	4,300
1-5	63,000	5,200
1-6	74,000	6,100
1-7	85,000	7,000
1-8	96,000	7,900
1-9	107,000	8,800
1-10	118,000	9,700
1-11	129,000	10,600
1-12	129,604	10,646

After the first 12 calendar months of operation following the issuance of this permit,

compliance with the annual finished feed production and sawdust fuel usage limitations shall be based upon a rolling, 12-month summation.

### III. 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 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, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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 emissions; and

- e. any corrective actions taken to minimize the visible emissions.

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

- 3. The permittee shall maintain monthly records of the following information for emission units P901 and P902, combined:

- a. tons of finished product produced and tons of sawdust burned;
- b. during the first 12 calendar months of operation, the cumulative total tons of finished product produced and tons of sawdust burned;
- c. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the tons finished product produced and tons of sawdust burned;
- d. the calculated monthly emission rate for NO<sub>x</sub> using the following equation:  
  
$$\text{NO}_x \text{ emissions in tons} = (\text{tons of sawdust burned}) \times (\text{an emissions factor of pounds of NO}_x \text{ emissions per ton of sawdust burned as established by the most recent performance test accepted by the Ohio EPA}) + 0.111 \text{ ton NO}_x \text{ per month from continuous RTO operation}$$
- e. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for NO<sub>x</sub>, in tons.

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- f. the calculated monthly emission rate for VOC using the following equation:  
  
VOC emissions in tons = (tons of finished product produced) x (an emissions factor of pounds of VOC emissions per ton of finished product as established by the most recent performance test accepted by the Ohio EPA) x (1 - destruction efficiency for the RTO)
- g. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for VOC, in tons.

**IV. 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 particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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.
- 3. The permittee shall submit deviation (excursion) reports which identify the following exceedances:
  - a. the rolling, 12-month tons of finished product produced and tons of sawdust burned operating limitation;
  - b. for the first 12 calendar months of operation following the issuance of the permit, all exceedances of the maximum allowable cumulative tons of finished product produced and tons of sawdust burned limitations;
  - c. the rolling, 12-month NO<sub>x</sub> emissions; and
  - d. the rolling, 12-month VOC emissions.

These deviation (excursion) reports shall be submitted in accordance with the general

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terms and conditions of this permit.

4. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual, combined finished feed throughput limitation, as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

## V. 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 in accordance with all the time lines established in the terms of the negotiated Consent Order.
  - b. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency requirements and the lb/hr limitations for VOC and the lb/hr limitations for PE, NO<sub>x</sub> and CO.
  - 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 NO<sub>x</sub>, 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 overall control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. 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 emissions units P901 and P902 are operating at or near their maximum combined capacity of 30 tons/hour , 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

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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).

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

0.15 lb PE/hour and 0.42 ton PE/year, combined for emission units P901 and P902

Applicable Compliance Method

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

The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pounds PE per ton of finished product (as established by the most recent performance test accepted by the Ohio EPA) by the actual tons of sawdust burned and dividing by 2000 lb per ton.

- b. Emission Limitation

13.11 lbs VOC/hour and 35.83 tons VOC per rolling, 12-month period for emission units P901 and P902, combined

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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 Testing Requirements in Section A.V.1).

The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pounds VOC per ton of finished product produced (as established by the most recent performance test accepted by the Ohio EPA) by the actual tons of finished product produced and dividing by 2000 lb per ton.

c. Emission Limitation

22.09 lbs CO/hour and 61.01 tons CO/year, combined for emission units P901 and P902

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 Testing Requirements in Section A.V.1).

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The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pounds CO per ton of sawdust burned (as established by the most recent performance test accepted by the Ohio EPA) by the actual tons of sawdust burned and dividing by 2000 lb per ton.

- d. Emission Limitation  
35.83 lbs NOx/hour and 97.83 tons NOx per rolling, 12-month period for emission units P901 and P902, combined

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 Testing Requirements in Section A.V.1).

The permittee shall demonstrate compliance with the annual limitation by multiplying an emission factor of pounds NOx per ton of sawdust burned (as established by the most recent performance test accepted by Ohio EPA) by the actual tons of sawdust burned and dividing by 2000 lb per ton.

- e. Emission Limitation  
Visible PE shall not exceed 0% opacity as a six-minute average from the regenerative thermal oxidizer (RTO) except during burn-out when visible PE shall not exceed 20% opacity as a six-minute average

Applicable Compliance Method

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

- f. Emission Limitation  
4.16 tons fugitive PE/year

Applicable Compliance Method

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for building enclosure to a maximum uncontrolled emission rate of 13.85 tons PE per year. The maximum uncontrolled emission rate was calculated by multiplying an emission factor of 0.061 lb PE per ton from AP-42 Table 9.9.1-2, (revised 5/98), a total maximum material handling throughput of tons per year for each component of this emissions unit and a conversion factor of 1 ton/2000 lbs. The total uncontrolled emission rate is based on the following throughputs for distinct material handling operations:

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Drop-out box to conveyor - 129,604 tons/yr  
Cyclone conveyor to sifter conveyor - 129,604 tons/yr  
Sifter #1 and Sifter #2- 129,604 tons/yr  
Sifter #2 drop-out to bucket elevator - 62,709 tons/yr  
Sifter #2 drop-out to hammermill - 2,613 tons/yr

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput of 163,800 for emissions unit F002, raw material mixing and storage operations. Therefore provided compliance is shown with the annual throughput for emissions unit F002, compliance with the ton per year PE limitation for this emissions unit will be assumed.

- g. Emission Limitation:  
Visible fugitive 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.

- h. Emission Limitation:  
The maximum annual finished product produced and the maximum annual sawdust fuel usage for emissions units P901 and P902 combined, shall not exceed 129,604 tons and 10,646 tons per year, respectively, based upon a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance by the monitoring and record keeping in Section A.III.1.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P902 - Animal feed dryer and processing line 2 (modification to PTI 03-10060, issued on 3/26/97. This modification is to correct past permit allowable deficiencies. Emission unit formally permitted as P002.)	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permit to install for emissions units P901 and P902 was evaluated based on the actual materials (typically bakery by-products) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: ethanol

TLV (mg/m<sup>3</sup>): 1884.25

Maximum Hourly Emission Rate (lbs/hr): 13.11\*

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 66.78

MAGLC (ug/m<sup>3</sup>): 44863

\*Maximum hourly emission rate is the combined emission rate from P901 and P902 vented through a regenerative thermal oxidizer.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under

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OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
P903 - Sawdust receiving and storage	OAC rule 3745-31-05(A)(3)	see Section A.I.2.a.  0.24 lb particulate emissions (PE)/hour, 1.06 tons PE/year from sawdust storage bin vents  2.14 tons PE/year from fugitive emissions
	OAC rule 3745-17-11(A)	Visible fugitive PE from the building enclosure shall not exceed 10% opacity, as a six-minute average
	OAC rule 3745-17-07(A)	see Section A.I.2.b.
	OAC rule 3745-17-07(B)	see Section A.I.2.b.
	OAC rule 3745-17-08(A)	see Section A.I.2.d.  see Section A.I.2.c.

**2. Additional Terms and Conditions**

- 2.a Best available technology (BAT) for this emissions unit has been determined to be the use of the following:

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- i. cyclone for sawdust storage bin P901;
- ii. sock filter for sawdust storage bin P902;
- iii. total enclosure for P901 and P902 sawdust storage bin vents; and
- iv. three-sided enclosure for truck unloading into hopper.

BAT requirements also include compliance with the terms and conditions specified in Part III. A.I. and A.II. 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 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.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

## **II. Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 10,646 tons of sawdust.

## **III. 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 sawdust processed through this emissions unit.
2. The permittee shall perform daily checks, Monday through Friday except on holidays, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc) associated with 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:

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- 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 emissions; and
- e. any corrective actions taken to minimize the visible emissions.

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

#### IV. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual sawdust material throughput limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar 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 egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit and (b) describe any corrective actions taken to minimize 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.

#### V. Testing Requirements

1. 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:  
0.24 lb PE/hour

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Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by multiplying a maximum hourly throughput rate of 1.32 tons sawdust and an emission factor of 1.0 lb PE per ton (FIRE Data System 6.23, 10/00), applying a worst-case control factor of (1- 0.8) for 80% control efficiency for use of cyclone. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1- 5.

b. Emission Limitation:

1.06 ton PE/year

Applicable Compliance Method:

The emission limitation was established by multiplying an annual throughput limitation of 10,646 tons sawdust and an emission factor of 1.0 lb PE per ton (FIRE Data System 6.23, 10/00), applying a worst-case control factor of (1- 0.8) for 80% control efficiency for use of cyclone 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.

c. Emission Limitation:

2.14 tons fugitive PE/year

Applicable Compliance Method:

The tons PE/year emission limitation was established by applying a control factor of (1-0.7) for 70% control efficiency for three sided and building enclosures to a maximum uncontrolled emission rate of 5.32 tons PE per year for trucking unloading and a 90% control efficiency to a maximum uncontrolled emission rate of 5.32 tons PE per year for the drop-out from the storage bins to the dryers. The maximum uncontrolled emission rate was calculated by multiplying an emission factor 1.0 lb PE per ton (FIRE Data System 6.23, 10/00), a total maximum material handling throughput (tons per year for each component of the emissions unit) and a conversion factor of 1 ton/2000 lbs. The total uncontrolled emission rate is based on the following throughputs for distinct material handling operations:

Truck unloading into hopper - 10,646 tons/yr

Storage bin drop-out to P901 dryer - 5,323 tons/yr

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Storage bin drop-out to P902 dryer - 5,323 tons/yr

The total maximum material handling throughput for this emissions unit was derived from the maximum annual throughput limitation of 10,646 tons sawdust for this emissions unit. Therefore, provided compliance is shown with the annual throughput limitation, compliance with the ton per year PE limitation for this emissions unit will be assumed.

d. Emission Limitation:

Visible fugitive 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.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. 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>
P903 - Sawdust receiving and storage	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None