



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

12/12/07

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

14-31-40-0175
General Mills Operations Inc
Carson D. Funderburk Mr.
11301 Mosteller Road
Cincinnati, OH 45241

Dear Carson D. Funderburk:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 09/18/07. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43215**

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Sincerely,


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

cc: Hamilton County Dept. of Environmental Services
File, DAPC PIER



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 12/12/07

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 14-31-40-0175 to:
General Mills Operations Inc
11301 Mosteller Road
Cincinnati, OH 45241

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and a third column containing details like 'oven', 'P034 (Finished Product Conveyance/Packaging System)', and 'P029 (Cereal Production Line)'. Rows include B002, B003, and P002.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. The permittee shall submit required reports in the following manner:
- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

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

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

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

reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

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

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

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

See B.6 below if no deviations occurred during the quarter.

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

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by

permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

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

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

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

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

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

3. Risk Management Plans

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

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

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

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.

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

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.

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

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 reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

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

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.

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

8. Marketable Permit Programs

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

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

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must

record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. Reopening for Cause

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

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

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

11. Federal and State Enforceability

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

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - 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 paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

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

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

14. Operational Flexibility

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

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

15. Emergencies

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

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

16. Off-Permit Changes

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

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

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

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

17. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

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

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

19. Permit to Install Requirement

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

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

20. Air Pollution Nuisance

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

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

21. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

22. Title VI Provisions

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

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

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

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

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

2. Records Retention Requirements

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

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

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

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

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

B004 250 KW diesel emergency generator;
F001 plant roads and parking;
L001 non-halogenated parts washer for facility maintenance activities;
P001 pneumatic grain conveyance and cleaning systems(14-0746)
P026 grain unloading system A;
P027 grain unloading system B;
P030 grain conveyance system B;
P038 ingredient transfer system (PTI 14-4774)
P039 package line labeling(PTI 14-4944);
P041 plant-wide housekeeping vacuum system; and
P901 by-product loadout.

Each insignificant emissions unit at this facility must comply with all applicable state and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P040 propane back up system;
P042 natural gas/propane-fired finished product oven bulding 24;
T001 no. 2 oil above ground 25,000 gallon storage tank #1;
T002 no. 2 oil above ground 25,000 gallon storage tank #2;
T003 no. 2 oil above ground 25,000 gallon storage tank #3; and
T004 no. 2 oil above ground 25,000 gallon storage tank #4.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: New Boiler #1 (B002)

Activity Description: Boiler system consisting of one 73.7 MMBtu/hr boiler to supply steam for facility heating and process operations.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
B002 - 73.7 MMBtu/hr natural gas and No.2 oil-fired boiler	OAC rule 3745-31-05(C) (PTI 14-04653)	See sections A.I.2.c and A.II.4.
	OAC rule 3745-31-05(A)(3) (PTI 14-04653)	See sections A.I.2.a, A.I.2.b, A.II.1, A.II.2, A.II.3, and A.II.5
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B) and 40 CFR Part 60 Subpart Dc.
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-10(B)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input.
	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC 3745-21-08(B) 40 CFR Part 60 Subpart Dc	See section A.I.2.e. See section A.I.2.d.

2. Additional Terms and Conditions

2.a When burning No.2 fuel oil, the following emission limitations shall not be exceeded:

0.2 lb Carbon Monoxide (CO)/MMBtu of actual heat input;
0.17 lb Nitrogen Oxides (NO_x)/MMBtu of actual heat input;
0.02 lb PE and Particulate Matter 10 microns and less in diameter (PM₁₀)/MMBtu of actual heat input;
0.304 lb Sulfur Dioxide (SO₂)/MMBtu of actual heat input; and
0.0146 lb Organic Compound (OC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, OC, PE/PM₁₀, and NO_x are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.b When burning only Natural Gas, the following emission limitations shall not be exceeded:

0.06 lb Carbon Monoxide (CO)/MMBtu of actual heat input;
0.08 lb Nitrogen Oxides (NO_x)/MMBtu of actual heat input;
0.02 lb PE and Particulate Matter 10 microns and less in diameter (PM₁₀)/MMBtu of actual heat input;
0.0006 lb Sulfur Dioxide (SO₂)/MMBtu of actual heat input; and
0.0146 lb Organic Compound (OC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, OC, PE/PM₁₀, SO₂, and NO_x are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.c The total combined emissions from emissions units B002 and B003 shall not exceed the following based on a rolling 12-month summation:

37.98 Tons per year (TPY) CO;
37.79 TPY NO_x;
40.54 TPY SO₂;
6.45 TPY PE/PM₁₀; and
4.71 TPY OC.

2.d Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

2.e The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 14-04653. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall operate and maintain low-NO_x burners capable of meeting the NO_x emission limitations specified in section A.I.2 at all times when operating emissions units B002 and B003.

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

2. The total heat input for emissions units B002 and B003, combined, shall not exceed 73.7 MMBtu/Hr, this corresponds to a steam load of 60,000 lbs of steam per hour.

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

II. Operational Restrictions (continued)

3. The quality of the No.2 fuel oil burned in emissions units B002 and B003 shall have a combination of sulfur content and heat content sufficient to comply with the allowable SO₂ emission limitation of 0.304 pound SO₂/MMBtu actual heat input.

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

4. The total amount of No.2 fuel oil burned in emissions units B002 and B003, combined, shall not exceed 1,900,000 gallons per year based upon a rolling, 12-month summation.

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

5. The permittee shall burn only natural gas and/or No.2 fuel oil* in this emissions unit.

* The permittee may burn a vegetable oil based fuel (biodiesel) in this emission unit under the following conditions:

At least 30-days prior to employing biodiesel as a fuel, the permittee shall submit to the Hamilton County Department of Environmental Services emission information that demonstrates the use of biodiesel as a fuel will result in compliance with the emission limitations established in PTI 14-04653. At a minimum, this request shall detail the following information:

- i. certification that the biodiesel employed meets the specifications for B(100) ASTM D6751-07(b);
- ii. a description of all operating scenarios for the fuel (ie any mixtures of biodiesel and No.2 fuel oil);
- iii. emission information for all operating scenarios noted above;

The emission information noted above shall include references to all supporting stack test or fuel analysis used to generate the emission information submitted.

After reviewing the emission information required above, the Hamilton County Department of Environmental Services will respond in writing to either approve or deny the request for the permittee to employ biodiesel as a fuel. The permittee shall not employ biodiesel as a fuel without receiving prior written approval from the Hamilton County Department of Environmental Services.

Should the use of biodiesel as a fuel in this emission unit result in any physical or operational change that triggers a modification as defined in OAC rule 3745-31-01, the permittee shall submit a Permit to Install application prior to making the modification.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis:
 - a. the total amount of No.2 fuel oil burned in emissions units B002 and B003, combined;
 - b. the rolling 12-month summation of the usage totals recorded pursuant to A.III.1.a. above, i.e., the current month's total added to the previous 11-month total.
 - c. the total amount of natural gas burned in emissions units B002 and B003, combined.

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

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-04(E))

3. For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

4. The permittee shall continuously monitor and record the total combined steam flow rate for emissions units B002 and B003.

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

5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04653, issued on March 31, 1999: A.III.1-A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the director (the appropriate District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

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

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following
 - a. No. 2 fuel oil usage limitation of 1,900,000 gallons per year based on a rolling, 12-month summation; and
 - b. steam flow rate limitation of 60,000 lbs of steam/hr.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

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

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04653, issued on March 31, 1999: A.IV.1.-A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

- 1.a Emission Limitations-
PE/PM10 emissions shall not exceed 0.020 lb/MMBtu of actual heat input

6.45 TPY.

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil-

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation above pursuant to OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B))

V. Testing Requirements (continued)

1.b Emission Limitations -

SO₂ emissions shall not exceed 0.304 lb/MMBtu of actual heat input when burning fuel oil.

SO₂ emissions shall not exceed 0.0006 lb/MMBtu of actual heat input when burning natural gas.

40.54 Ton per year (TPY) SO₂.

Applicable compliance method when burning No.2 fuel oil-

Compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil received during the calendar month.

Applicable compliance method when burning natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb SO₂/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained. Should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factor and methodologies specified above for natural gas, and the calculated SO₂ emission rates and fuel usage information collected and recorded in A.III.1 for No.2 fuel oil.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6C, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(F), and OAC 3745-31-05(C))

1.c Emission Limitations-

NO_x emissions shall not exceed 0.17 lb/mmBtu of actual heat input when burning only #2 fuel oil.

NO_x emissions shall not exceed 0.08 lb/mmBtu of actual heat input when burning only natural gas.

37.79 TPY of NO_x

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the manufacturer's guaranteed emission factor, submitted with PTI Application 14-04653 on September 1, 1999, of 80 lbs NO_x/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when No.2 fuel oil-

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 20 lbs NO_x/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu limitations in accordance with Method 7, 40 CFR, Part 60, Appendix A.

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

V. Testing Requirements (continued)

1.d Emission Limitations-
CO emissions shall not exceed 0.06 lb/mmBtu of actual heat input when burning only natural gas.

CO emissions shall not exceed 0.2 lb/mmBtu of actual heat input when burning #2 fuel oil.

37.98 TPY of CO

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the manufacturer's guaranteed emission factor, submitted with PTI Application 14-40653 on September 1, 1999, of 60 lbs CO/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil-

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 5 lbs CO/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with Method 10, 40 CFR, Part 60, Appendix A.

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

1.e Emission Limitations-
OC emissions shall not exceed 0.0146 lb/mmBtu of actual heat input.

4.71 TPY of OC

Applicable compliance method when burning natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.5 lbs VOC/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil-

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (revised 9/98) emission factor of 0.2 lb OC/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu limitation in accordance with Method 25, 40 CFR, Part 60, Appendix A.

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

V. Testing Requirements (continued)

- 1.f Emission Limitation-
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC 3745-17-03(B), OAC 3745-31-05(A)(3), and 40 CFR Part 60 Subpart Dc)

2. Compliance with the total combined steam flow rate limitation in A.II.2 shall be determined by the record keeping in A.III.4.

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

3. Compliance with the total combined No.2 fuel oil usage limitation in A.II.4 shall be determined by the record keeping in A.III.1.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-04653, issued on March 31, 1999: A.V.1.-A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

1. **None**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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B002 - 73.7 MMBtu/hr natural gas
and No.2 oil-fired boiler

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: New Boiler #2 (B003)

Activity Description: Boiler system consisting of one 73.7 MMBtu/hr boiler to supply steam for facility heating and process operations.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
B003 - 73.7 MMBtu/hr natural gas and No.2 oil-fired boiler	OAC rule 3745-31-05(C) (PTI 14-04653)	See sections A.I.2.c and A.II.4.
	OAC rule 3745-31-05(A)(3) (PTI 14-04653)	See sections A.I.2.a, A.I.2.b, A.II.1, A.II.2, A.II.3, and A.II.5
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B) and 40 CFR Part 60 Subpart Dc.
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-10(B)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input.
	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC 3745-21-08(B) 40 CFR Part 60 Subpart Dc	See section A.I.2.e. See section A.I.2.d.

2. Additional Terms and Conditions

2.a When burning No.2 fuel oil, the following emission limitations shall not be exceeded:

0.2 lb Carbon Monoxide (CO)/MMBtu of actual heat input;
0.17 lb Nitrogen Oxides (NO_x)/MMBtu of actual heat input;
0.02 lb PE and Particulate Matter 10 microns and less in diameter (PM₁₀)/MMBtu of actual heat input;
0.304 lb Sulfur Dioxide (SO₂)/MMBtu of actual heat input; and
0.0146 lb Organic Compound (OC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, OC, PE/PM₁₀, and NO_x are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.b When burning only Natural Gas, the following emission limitations shall not be exceeded:

0.06 lb Carbon Monoxide (CO)/MMBtu of actual heat input;
0.08 lb Nitrogen Oxides (NO_x)/MMBtu of actual heat input;
0.02 lb PE and Particulate Matter 10 microns and less in diameter (PM₁₀)/MMBtu of actual heat input;
0.0006 lb Sulfur Dioxide (SO₂)/MMBtu of actual heat input; and
0.0146 lb Organic Compound (OC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, OC, PE/PM₁₀, SO₂, and NO_x are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.c The total combined emissions from emissions units B002 and B003 shall not exceed the following based on a rolling 12-month summation:

37.98 Tons per year (TPY) CO;
37.79 TPY NO_x;
40.54 TPY SO₂;
6.45 TPY PE/PM₁₀; and
4.71 TPY OC.

2.d Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

2.e The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 14-04653. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall operate and maintain low-NO_x burners capable of meeting the NO_x emission limitations specified in section A.I.2 at all times when operating emissions units B002 and B003.

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

2. The total heat input for emissions units B002 and B003, combined, shall not exceed 73.7 MMBtu/Hr, this corresponds to a steam load of 60,000 lbs of steam per hour.

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

II. Operational Restrictions (continued)

3. The quality of the No.2 fuel oil burned in emissions units B002 and B003 shall have a combination of sulfur content and heat content sufficient to comply with the allowable SO₂ emission limitation of 0.304 pound SO₂/MMBtu actual heat input.

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

4. The total amount of No.2 fuel oil burned in emissions units B002 and B003, combined, shall not exceed 1,900,000 gallons per year based upon a rolling, 12-month summation.

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

5. The permittee shall burn only natural gas and/or No.2 fuel oil* in this emissions unit.

* The permittee may burn a vegetable oil based fuel (biodiesel) in this emission unit under the following conditions:

At least 30-days prior to employing biodiesel as a fuel, the permittee shall submit to the Hamilton County Department of Environmental Services emission information that demonstrates the use of biodiesel as a fuel will result in compliance with the emission limitations established in PTI 14-04653. At a minimum, this request shall detail the following information:

- i. certification that the biodiesel employed meets the specifications for B(100) ASTM D6751-07(b);
- ii. a description of all operating scenarios for the fuel (ie any mixtures of biodiesel and No.2 fuel oil);
- iii. emission information for all operating scenarios noted above;

The emission information noted above shall include references to all supporting stack test or fuel analysis used to generate the emission information submitted.

After reviewing the emission information required above, the Hamilton County Department of Environmental Services will respond in writing to either approve or deny the request for the permittee to employ biodiesel as a fuel. The permittee shall not employ biodiesel as a fuel without receiving prior written approval from the Hamilton County Department of Environmental Services.

Should the use of biodiesel as a fuel in this emission unit result in any physical or operational change that triggers a modification as defined in OAC rule 3745-31-01, the permittee shall submit a Permit to Install application prior to making the modification.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis:
- a. the total amount of No.2 fuel oil burned in emissions units B002 and B003, combined;
 - b. the rolling 12-month summation of the usage totals recorded pursuant to A.III.1.a. above, i.e., the current month's total added to the previous 11-month total.
 - c. the total amount of natural gas burned in emissions units B002 and B003, combined.

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

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-04(E))

3. For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

4. The permittee shall continuously monitor and record the total combined steam flow rate for emissions units B002 and B003.

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

5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04653, issued on March 31, 1999: A.III.1-A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the director (the appropriate District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

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

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following
 - a. No. 2 fuel oil usage limitation of 1,900,000 gallons per year based on a rolling, 12-month summation; and
 - b. steam flow rate limitation of 60,000 lbs of steam/hr.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

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

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04653, issued on March 31, 1999: A.IV.1.-A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

- 1.a Emission Limitations-
PE/PM10 emissions shall not exceed 0.020 lb/MMBtu of actual heat input

6.45 TPY.

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil-

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation above pursuant to OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B))

V. Testing Requirements (continued)

1.b Emission Limitations -

SO₂ emissions shall not exceed 0.304 lb/MMBtu of actual heat input when burning fuel oil.

SO₂ emissions shall not exceed 0.0006 lb/MMBtu of actual heat input when burning natural gas.

40.54 Ton per year (TPY) SO₂.

Applicable compliance method when burning No.2 fuel oil-

Compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil received during the calendar month.

Applicable compliance method when burning natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb SO₂/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained. Should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factor and methodologies specified above for natural gas, and the calculated SO₂ emission rates and fuel usage information collected and recorded in A.III.1 for No.2 fuel oil.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6C, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(F), and OAC 3745-31-05(C))

1.c Emission Limitations-

NO_x emissions shall not exceed 0.17 lb/mmBtu of actual heat input when burning only #2 fuel oil.

NO_x emissions shall not exceed 0.08 lb/mmBtu of actual heat input when burning only natural gas.

37.79 TPY of NO_x

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the manufacturer's guaranteed emission factor, submitted with PTI Application 14-04653 on September 1, 1999, of 80 lbs NO_x/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when No.2 fuel oil-

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 20 lbs NO_x/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu limitations in accordance with Method 7, 40 CFR, Part 60, Appendix A.

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

V. Testing Requirements (continued)

- 1.d** Emission Limitations-
CO emissions shall not exceed 0.06 lb/mmBtu of actual heat input when burning only natural gas.

CO emissions shall not exceed 0.2 lb/mmBtu of actual heat input when burning #2 fuel oil.

37.98 TPY of CO

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the manufacturer's guaranteed emission factor, submitted with PTI Application 14-40653 on September 1, 1999, of 60 lbs CO/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil-

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 5 lbs CO/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with Method 10, 40 CFR, Part 60, Appendix A.

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

- 1.e** Emission Limitations-
OC emissions shall not exceed 0.0146 lb/mmBtu of actual heat input.

4.71 TPY of OC

Applicable compliance method when burning natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.5 lbs VOC/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil-

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (revised 9/98) emission factor of 0.2 lb OC/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation and No.2 fuel oil usage restriction specified in A.II.4 are maintained (should the annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.1.).

If required, the permittee shall demonstrate compliance with the lb/MMBtu limitation in accordance with Method 25, 40 CFR, Part 60, Appendix A.

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

V. Testing Requirements (continued)

- 1.f Emission Limitation-
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC 3745-17-03(B), OAC 3745-31-05(A)(3), and 40 CFR Part 60 Subpart Dc)

2. Compliance with the total combined steam flow rate limitation in A.II.2 shall be determined by the record keeping in A.III.4.

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

3. Compliance with the total combined No.2 fuel oil usage limitation in A.II.4 shall be determined by the record keeping in A.III.1.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-04653, issued on March 31, 1999: A.V.1.-A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

1. **None**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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B003 - 73.7 MMBtu/hr natural gas
and No.2 oil-fired boiler

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Cereal Production Line (P002)

Activity Description: Pneumatic conveyance from mill to cookers, pneumatic conveyance from pelletizer to tempering oven, tempering oven, pneumatic conveyance from rolls to oven, and finished product oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P002 - Cereal Production Line consisting of pneumatic conveyance from mill to cookers, pneumatic conveyance from pelletizer to tempering oven, tempering oven, pneumatic conveyance from rolls to oven, and finished product oven.	OAC rule 3745-31-05(A)(3) (PTI 14-05120)	Particulate Emissions (PE) and emissions of Particulate Matter 10 microns less in diameter (PM10) shall not exceed 2.49 pounds per hour and 10.9 tons per year. The PE/PM10 emission limitations established in PTI 14-05120 were based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations. See section A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- PE from the equipment comprising this emissions unit shall be captured and vented to the baghouse #671, or an equivalent control device capable of complying with the PE/PM10 emission limitations established in PTI 14-05120.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across baghouse #671 shall be between 0.1 to 10 inches of water.

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05120, issued on May 30, 2002: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):
 - a. each period of time when the pressure drop across the baghouse was outside of the range specified in A.III.1 and outside of the acceptable range following any required compliance demonstration;
 - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05120, issued on May 30, 2002: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

- 1.a Emission Limitation-
Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3)) and OAC rule 3745-17-07(A)

- 1.b Emission Limitations-
PE/PM10 emissions shall not exceed 2.49 pounds per hour and 10.9 tons per year.

The PE/PM10 emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in PTI application 14-05120 issued on May 30, 2002.

If additional stack testing is required to demonstrate compliance with the allowable PE limitation, Method 5 of 40 CFR, Part 60, Appendix A shall be used to demonstrate compliance.

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

V. Testing Requirements (continued)

- 1.c** Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05120, issued on May 30, 2002: A.V.1.a.-A.V.1.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

- 1. None**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P002 - Cereal Production Line consisting of pneumatic conveyance from mill to cookers, pneumatic conveyance from pelletizer to tempering oven, tempering oven, pneumatic conveyance from rolls to oven, and finished product oven.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Cereal Production Line (P029)

Activity Description: Pneumatic grain conveyance systems, cooker feed system, tempering dryer, predryer, and oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P029 - Cereal Production Line consisting of pneumatic grain conveyance systems, cooker feed system, tempering dryer, predryer, and oven.	OAC rule 3745-31-05(A)(3) (PTI 14-04952)	<p>Particulate Emissions (PE) and emissions of Particulate Matter less than 10 microns in diameter (PM10) shall not exceed 2.21 pounds per hour and 9.7 tons per year.</p> <p>The PE/PM10 emission limitations established in PTI 14-04952 were based on the emissions unit's potentials to emit.</p> <p>Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.</p>
	OAC rule 3745-17-07(A)	<p>See section A.I.2.a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p>
	OAC rule 3745-17-11	<p>Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.</p> <p>The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a PE from the equipment comprising this emissions unit shall be captured and vented to the baghouses #9292, #9568, and #9589, or an equivalent control device capable of complying with the PE/PM10 emission limitations established in PTI 14-04952.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across baghouses #9292, #9568, and #9589 shall be between 0.1 to 10 inches of water.

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

III. Monitoring and/or Record Keeping Requirements (continued)

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-04952, issued on March 20, 2001: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):
 - a. each period of time when the pressure drop across the baghouse was outside of the range specified in A.III.1 and outside of the acceptable range following any required compliance demonstration;
 - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-04952, issued on March 20, 2001: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

V. Testing Requirements

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

- 1.a Emission Limitation-
Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3)) and OAC rule 3745-17-07(A)

V. Testing Requirements (continued)

- 1.b** Emission Limitations-
PE/PM10 emissions shall not exceed 2.21 pounds per hour and
9.7 tons per year.

The PE/PM10 emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in PTI application 14-04952, issued on March 20, 2001.

If additional stack testing is required to demonstrate compliance with the allowable PE limitation, Method 5 of 40 CFR, Part 60, Appendix A shall be used to demonstrate compliance.

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

- 1.c** Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # # 14-04952, issued on March 20, 2001: A.V.1.a.-A.V.1.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

- 1. None**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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P029 - Cereal Production Line consisting of pneumatic grain conveyance systems, cooker feed system, tempering dryer, predryer, and oven.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Finished Product Conveyance/Packaging System (P034)

Activity Description: Finished product conveyance/packaging system.
 Note: Formerly referred to as 3rd Floor Roll Lines Building 5 in PTI # 14-05280 (5/30/02).

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P034-Finished product conveyance/packaging system	OAC rule 3745-31-05(A)(3) (PTI 14-05280)	Particulate Emissions (PE) and emissions of Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 3.78 pounds per hour and 16.54 tons per year. The PE/PM10 emission limitations established in PTI 14-05280 were based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations. See section A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** PE from the equipment comprising this emissions unit shall be captured and vented to baghouses # 7259 and # 7521, or an equivalent control device capable of complying with the PE/PM10 emission limitations established in PTI 14-05280.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across baghouses #7259 and #7521 shall be between 0.1 to 10 inches of water.

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-5280, issued on May 30, 2002: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):
 - a. each period of time when the pressure drop across the baghouse was outside of the range specified in A.III.1 and outside of the acceptable range following any required compliance demonstration;
 - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-5280, issued on May 30, 2002: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

- 1.a Emission Limitation-
Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-17-07(A))

- 1.b Emission Limitations-
PE/PM10 emissions shall not exceed 3.78 pounds per hour and 16.54 tons per year.

The PE/PM10 emission limitations were based on the emissions unit's potential to emit. The detailed calculations used to develop these emission limitations can be found in PTI application 14-05280, issued on May 30, 2002.

If additional stack testing is required to demonstrate compliance with the allowable PE limitation, Method 5 of 40 CFR, Part 60, Appendix A shall be used to demonstrate compliance.

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

V. Testing Requirements (continued)

- 1.c** Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # # 14-05280, issued on May 30, 2002: A.V.1.a.-A.V.1.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

VI. Miscellaneous Requirements

- 1. None**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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P034-Finished product
conveyance/packaging system

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **General Mills Operations, Inc.**
Facility ID: **14-31-40-0175**

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	General Mills Operations, Inc.
Premise Number	1431400175
What makes this facility a Title V facility?	Potential emissions of PM10>100 TPY
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	<p>A number of pieces of equipment were removed from renewal application of the Title V for emissions unit P002. However, the result was that the assigned allowable emissions did not change from the original Title V.</p> <p>A number of pieces of equipment were also removed from renewal application of the Title V for emissions unit P034. In addition, a dust collector was added to this emissions unit. This resulted in assigning new allowable PE/PM10 emissions and deleting the OC permit allowables assigned from the original Title V.</p>

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.	77-01(u)		Listing of insignificant emissions units

C

Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B002 and B003	0.2 lb CO/MMBTU when burning No.2 oil	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.06 lb CO/MMBTU when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B002 and B003	0.17 lb NOx/MMBT U when burning No.2 oil	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.08 lb NOx/MMBT U when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.02 lb PE/PM10/MBTU when burning No.2 oil	17-10(B)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.02 lb PE/PM10/MBTU when burning Natural Gas	17-10(B)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.304 lb SO2/MMBT U when burning No.2 oil	31-05(A)(3)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-sulfur content and heat content restrictions M-Fuel oil is sampled for heat content and sulfur content R-The heat content, sulfur content, and emission rate is recorded Rp-Deviation Reports are submitted for non-compliance
B002 and B003	0.0006 lb SO2/MMBT U when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.0146 lb OC/MMBTU when burning No.2 oil	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B002 and B003	0.00146 lb OC/MMBTU when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 37.98 TPY CO	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 37.79 TPY NOx	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 40.54 TPY SO2	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 6.45 TPY PE/PM10	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 4.71 TPY OC	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.

B002 and B003	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.		40 CFR Part 60 Subpart Dc	N	Y	N	N	N	N	N	N	N	N	N	OR: required to utilize inherently clean fuel (natural gas only) ET: Compliance with opacity demonstrated by use of inherently clean fuel and fuel type record keeping requirements. No visible emission testing unless a problem is identified with the emission unit.
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
P002	2.49 lbs/Hr and 10.9 TPY PE/PM10	31-05(C)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. Rp-Deviation reports are required to identify problems with the baghouse.
P029	2.21 lbs/Hr and 9.7 TPY PE/PM10	31-05(C)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. Rp-Deviation reports are required to identify problems with the baghouse.
P34	3.42 lbs/Hr and 15.2 TPY PE/PM10	31-05(C)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. Rp-Deviation reports are required to identify problems with the baghouse.

P002, P029, P034	20 % Opacity	17-07(A)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. This ensures compliance with the visible emission limitation. Rp-Deviation reports are required to identify problems with the baghouse.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.