

Facility ID: 0868730146 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0868730146 Emissions Unit ID: P106 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. 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> |
|--|---|--|
| P106 - Pet Food Drying and Cooling System 3 | OAC rule 3745-31-05(A)(3) PTI 08-04584 | Particulate emissions (PE) shall not exceed 1.28 lbs/hr and 5.59 TPY. Volatile organic compound (VOC) emissions shall not exceed 2.46 lbs/hr and 10.79 TPY. Carbon monoxide (CO) emissions shall not exceed 2.08 lbs/hr and 9.11 TPY. Nitrogen oxides (NOx) emissions shall not exceed 2.70 lbs/hr and 11.83 TPY. |
| | OAC rule 3745-17-11(B)(1) | Visible emissions shall not exceed 10% opacity, as a 6-minute average. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| | OAC rule 3745-17-07(A) | The opacity limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

2. **Additional Terms and Conditions**
 - (a) The hourly and annual emission limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

1. The pressure drop across the multiclone shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the multiclone while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the multiclone on a weekly basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify that all periods of time during which the pressure drop across the multiclone did not comply with the allowable range specified above. The permittee shall submit the deviation (excursion) reports in accordance with the General Terms and Conditions.

E. Testing Requirements

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

a. Emission Limitation-
1.28 lbs/hr PE

Applicable Compliance Method -
Compliance shall be determined as follows:

- i. For pet food drying, multiply the uncontrolled hourly emission rate of 13.7 lbs PE/hr (source test report, August 4, 1992) by a control factor of $((100 - 94 / 100))$ where 94 is the control efficiency of the cyclone separator (100% capture efficiency).
- ii. For pet food cooling, multiply the uncontrolled hourly emission rate of 13.6 lbs PE/hr (source test report, August 4, 1992) by a control factor of $((100 - 99 / 100))$ where 99 is the control efficiency of the cyclone separator (100% capture efficiency).
- iii. Sum i + ii

If required, the permittee shall demonstrate compliance with the PE limitation above based on the test results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(10) using Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation-
5.59 TPY PE

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly PE rate by the maximum operating hours (8,760 hours/yr) and dividing by 2,000 lbs/ton.

c. Emission Limitation-
2.46 lbs/hr VOC

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum capacity of the process (16 tons/hr) by the emission factor of 0.154 lbs VOC/ton product (July 23-25, 2003 emission test at Leipsic, Ohio facility).

d. Emission Limitation-
10.79 TPY VOC

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly VOC emission rate by the maximum operating hours (8,760 hours/yr) and dividing by 2,000 lbs/ton.

e. Emission Limitation-
2.08 lbs/hr CO

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum rated heat input capacity of the dryer (13 MMBtu/hr) by the emission factor of 0.16 lbs CO/MMBtu (dryer manufacturer-provided emission factor).

f. Emission Limitation-
9.11 TPY CO

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly CO emission rate by the maximum operating hours (8,760 hours/yr) and dividing by 2,000 lbs/ton.

g. Emission Limitation-
2.70 lbs/hr NOx

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum rated heat input capacity of the dryer (13 MMBtu/hr) by the emission factor of 0.2077 lbs NOx/MMBtu (AP-42 Table 1.5-1 (10/96), 19 lb/1000 gal / 91.5 MMBtu/1000 gal = 0.2077 lbs/MMBtu).

h. Emission Limitation-
11.83 TPY NOx

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly NOx emission rate by the maximum operating hours (8,760 hours/yr) and dividing by 2,000 lbs/ton.

i. Emission Limitation-
10% opacity as a 6-minute average

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

F. **Miscellaneous Requirements**

1. None