



State of Ohio Environmental Protection Agency

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Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

8/13/2009

Ms. Erika Saad
Mars Petcare US, Inc.
P.O. Box 683006
Franklin, TN 37068

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0124010128
Permit Number: P0105186
Permit Type: Renewal
County: Fayette

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
Mars Petcare US, Inc.**

Facility ID: 0124010128
Permit Number: P0105186
Permit Type: Renewal
Issued: 8/13/2009
Effective: 8/13/2009
Expiration: 8/13/2014



Air Pollution Permit-to-Install and Operate
for
Mars Petcare US, Inc.

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Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

Authorization

Facility ID: 0124010128

Application Number(s): A0035842

Permit Number: P0105186

Permit Description: Federally enforceable permit-to-install and operate a dog and cat food manufacturing facility.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 8/13/2009

Effective Date: 8/13/2009

Expiration Date: 8/13/2014

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Mars Petcare US, Inc.
1 DOANE DR
Washington Court House, OH 43160

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0105186
 Permit Description: Federally enforceable permit-to-install and operate a dog and cat food manufacturing facility.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	B001
Company Equipment ID:	B001 Boiler
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F001
Company Equipment ID:	F001 Ing Unload (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	F002 Ingr Hndl (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	F003 Ingr Unload (B)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	F004 Ing Hndling (B)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	P003 Ing SSM
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	P004 HM (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	P005 EXTRDRS (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	P006 Rotex Scrn (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	P007 PF Product Pkg
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	P008 Biscuit SS&M



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Final Permit-to-Install and Operate
Permit Number: P0105186
Facility ID: 0124010128
Effective Date: 8/13/2009

Superseded Permit Number: 01-01304
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P009
 Company Equipment ID: P009 Milling (B)
 Superseded Permit Number: 01-01304
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P010
 Company Equipment ID: P010 Biscuit Pcking
 Superseded Permit Number: 01-01304
 General Permit Category and Type: Not Applicable

Group Name: Biscuit dryers

Emissions Unit ID:	N004
Company Equipment ID:	N004 Dryer #4 (B)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	N005
Company Equipment ID:	N005 Dryer #5 (B)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable

Group Name: Pet food dryers

Emissions Unit ID:	N001
Company Equipment ID:	N001 Dryer #1 (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	N002
Company Equipment ID:	N002 Dryer #2 (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	N003
Company Equipment ID:	N003 Dryer #3 (PF)
Superseded Permit Number:	01-01304
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC



rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

C. Emissions Unit Terms and Conditions



1. B001, B001 Boiler

Operations, Property and/or Equipment Description:

12.0 mmBtu/hr natural gas- or propane-fired boiler; boiler no. 1 (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.09 lb/hr and 0.40 tons per year (TPY). Nitrogen oxide (NO _x) emissions shall not exceed 2.49 lbs/hr and 10.90 TPY. Sulfur dioxide (SO ₂) emissions shall not exceed 0.2 lb/hr 0.86 TPY. Carbon monoxide (CO) emissions shall not exceed 1.01 lbs/hr and 4.42 TPY. Organic compound emissions (OC) shall not exceed 0.13 lb/hr 0.58 TPY. The requirements established pursuant to this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and the requirements of 40 CFR Part 60, Subpart Dc.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. and c)(2) below.
b.	OAC rule 3745-17-07(A)	Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(D)	The SO ₂ limitation specified by this rule is less stringent than the SO ₂ limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 60, Subpart Dc	See c)(1) below.
f.	40 CFR Part 60, Subpart A	See b)(2)b. below.

(2) Additional Terms and Conditions

The hourly and annual emissions limitations for this emissions unit were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with these emissions limitations.

The permittee shall demonstrate compliance with the applicable limitations identified in 40 CFR Part 60, Subpart Dc in accordance with the General Provisions of the Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subpart A (60.1-60.19).

c) Operational Restrictions

- (1) The permittee shall only combust natural gas or propane as fuels in this emissions unit.

The quality of propane burned in this emissions unit shall meet the following specifications on an "as burned" basis:

- a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 15 grains/100 cf; and
- b. compliance with the above-mentioned specifications shall be determined by using analytical results provided by the propane supplier for each shipment of propane.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the type and quantity of fuel burned in this emissions unit.



- (2) For each day during which the permittee burns a fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (30) For each shipment of propane received for burning in this emissions unit, the permittee shall maintain records of the total quantity of propane received and the propane supplier's analyses for sulfur content.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify the following:
 - a. each day when a fuel other than natural gas or propane was burned in this emissions unit; and
 - b. each day when propane with a sulfur content greater than 15 gr/100 cf was burned in this emissions unit.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) This emissions unit is subject to the applicable provisions of Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

construction date (no later than 30 days after such date);

actual start-up date (within 15 days after such date); and,

date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

OEPA - CDO
Division of Air Pollution Control
P.O. Box 1049
Columbus, Ohio 43216-1049

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

Emissions Limitation:

Emissions from natural gas and/or propane usage shall not exceed:

2.49 lbs NO_x/hr and 10.9 tons NO_x/yr;
0.2 lb SO₂/hr and 0.86 ton SO₂/yr;
1.01 lbs CO/hr and 4.42 tons CO/yr;
0.09 lb PE/hr and 0.40 ton PE/yr; and
0.13 lb OC/hr and 0.58 ton OC/yr.

Applicable Compliance Method:

The hourly emissions limitations were established by multiplying the maximum total hourly natural gas or propane usage for the boiler (0.012 MMcf/hr natural gas)(0.13 Mgal/hr propane) by the following emission factor for each pollutant in order to establish the worst-case hourly emission limitation for each pollutant:

<u>Pollutant</u>	<u>Emission Factor</u>
NO _x	19 lbs of NO _x /Mgal of propane
SO ₂	1.5 lbs of SO ₂ */Mgal of propane
CO	84 lbs of CO/MMcf of natural gas
PE	7.6 lb of PE/MMcf of natural gas
OC	11 lbs of OC/MMCF of natural gas

Emission factors for propane usage are taken from Table 1.5-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for external combustion sources. Emission factors for natural gas usage are taken from Tables 1.4-1 and 1.4-2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for external combustion sources.

The emission factor for SO₂ is derived by multiplying the AP-42 emission factor (0.1 lb SO₂/Mgal of propane) by the maximum sulfur content of the propane (15 grains/100 cf).

If required, the following test methods shall be used to demonstrate compliance with the hourly allowable emissions limitations:

<u>Pollutant</u>	<u>Test Method(s)</u>
NO _x	Method 7 or 7E of 40 CFR Part 60, Appendix A
SO ₂	Method 6 or 6C of 40 CFR Part 60, Appendix A
CO	Method 10 of 40 CFR Part 60, Appendix A
PE	Method 5 of 40 CFR Part 60, Appendix A
OC	Method 18, 25 or 25A of 40 CFR Part 60, Appendix A

The annual emissions limitations were calculated by multiplying the maximum hourly emission rate by 8,760 hours/year and dividing by 2,000 pounds/ton. Compliance with



the annual emissions limitations will be assumed as long as compliance with the lb/hr limitations are maintained.

Emission Limitation:

Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



2. F001, F001 Ing Unload (PF)

Operations, Property and/or Equipment Description:

truck and railcar unloading (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 9.0 lbs/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 20.25 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The weight of all ingredients unloaded by truck and rail for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck and rail for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by multiplying d)(1)b. by the controlled emission factor (0.09 lb/ton) and then converting to tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.



These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 9.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by multiplying the maximum process weight rate (100 tons/hr) by the controlled emission factor (0.09 lb/ton) derived by multiplying the AP-42* emissions factor for grain unloading (0.18 lb/ton truck) by a control efficiency of 50% to account for choke feed methods of unloading.

*Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for grain receiving by straight truck.

Emissions Limitation:

Particulate emissions shall not exceed 20.25 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.



3. F002, F002 Ingr Hndl (PF)

Operations, Property and/or Equipment Description:

Raw material handling (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.92 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 4.12 tons per rolling, 12-month period.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.

- (2) Additional Terms and Conditions

The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.



This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck and rail for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck and rail for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by multiplying d)(1)b. by the controlled emission factor (0.0183 lb/ton) and then converting to tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
- a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall



cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.92 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by multiplying the maximum process weight rate (50 tons/hr) by the controlled emission factor (0.0183 lb/ton) derived by multiplying the AP-42* emissions factor for grain handling (.061 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system.

*Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for headhouse and grain handling.

Emissions Limitation:

Particulate emissions shall not exceed 4.12 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.



4. F003, F003 Ingr Unload (B)

Operations, Property and/or Equipment Description:

truck unloading (biscuit operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 9.0 lbs/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 3.15 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 70,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck for the biscuit operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck for the biscuit operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by multiplying d)(1)b. by the controlled emission factor (0.09 lb/ton) and then converting to tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
- a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.



These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 9.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by multiplying the maximum process weight rate (100 tons/hr) by the controlled emission factor (0.09 lb/ton) derived by multiplying the AP-42* emissions factor for grain unloading (0.18 lb/ton truck) by a control efficiency of 50% to account for choke feed methods of unloading.

*Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for grain receiving by straight truck.

Emissions Limitation:

Particulate emissions shall not exceed 3.15 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.



5. F004, F004 Ing Hndling (B)

Operations, Property and/or Equipment Description:

raw material handling (biscuit operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.38 lb/hr. See b)(2)a. and b)(2)f. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 2.14 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.
- e. All flour employed by this emissions unit shall be processed by a baghouse product collection system with a minimum 99% control efficiency.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 70,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck for the biscuit operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck for the biscuit operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by multiplying d)(1)b. by the uncontrolled emission factor (0.061 lb/ton) and then converting to tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
- a. each exceedance of the rolling, 12-month ingredient throughput limitation; and



- b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.38 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by multiplying the maximum process weight rate (6.25 tons/hr) by the uncontrolled AP-42* emission factor for grain handling (0.061 lb/ton).

*Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for headhouse and grain handling.

Emissions Limitation:

Particulate emissions shall not exceed 2.14 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.



6. P003, P003 Ing SSM

Operations, Property and/or Equipment Description:

Raw ingredient screening, storage and mixing (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.76 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 2.53 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The weight of all ingredients unloaded by truck and rail for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck and rail for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by:
 - i. multiplying d)(1)b. by the controlled emission factor (0.00375 lb/ton) to determine the emissions from screening;
 - ii. multiplying d)(1)b. by the controlled emission factor (0.0075 lb/ton) to determine the emissions from storage; and
 - iii. adding d)(1)c.i. to d)(1)c.ii. and then converting the result into tons.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.76 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by:

- a. the maximum process weight rate for screening (100 tons/hr) by the controlled emission factor (0.00375 lb/ton) derived by multiplying the AP-42* emissions factor for crushed stone screening (0.0125 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system;
- b. multiplying the maximum process weight rate for storage (50 tons/hr) by the controlled emission factor (0.0075 lb/ton) derived by multiplying the AP-42** emissions factor for grain storage (0.025 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system; and
- c. adding f)(1)a.i. to f)(1)a.ii. above.

*Table 11.19.2-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for crushed stone screening.

**Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a grain storage bin.

Emissions Limitation:

Particulate emissions shall not exceed 2.53 tons per rolling, 12-month period.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



7. P004, P004 HM (PF)

Operations, Property and/or Equipment Description:

pet food milling, 2 hammermills utilizing 2 product collecting baghouses, and raw mix storage (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.68 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 4.39 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck and rail for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck and rail for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by:
 - i. multiplying d)(1)b. by the controlled emission factor (0.012 lb/ton) to determine the emissions from milling;
 - ii. multiplying d)(1)b. by the controlled emission factor (0.0075 lb/ton) to determine the emissions from storage; and
 - iii. adding d)(1)c.i. to d)(1)c.ii. and then converting the result into tons.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.68 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by:

- a. multiplying the maximum process weight rate for milling (25 tons/hr) by the controlled emission factor (0.012 lb/ton) derived by multiplying the AP-42* emissions factor for grain milling (1.2 lb/ton) by a control efficiency of 99% to account for the product collecting baghouses;
- b. multiplying the maximum process weight rate for storage (50 tons/hr) by the controlled emission factor (0.0075 lb/ton) derived by multiplying the AP-42** emissions factor for grain storage (0.025 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system; and
- c. adding f)(1)a.i. to f)(1)a.ii. above.

*Table 9.9.1-2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a hammermill at an animal feed mill.

**Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a grain storage bin.

Emissions Limitation:

Particulate emissions shall not exceed 4.39 tons per rolling, 12-month period.



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Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



8. P005, P005 EXTRDRS (PF)

Operations, Property and/or Equipment Description:

extruding process, 4 extruders utilizing 3 product collecting cyclones (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.45 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 2.06 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)	See b)(2)b. below.
e.	OAC rule 3745-17-08	See b)(2)c. below.
f.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions in tons, calculated by multiplying d)(1)b. by the controlled emission factor (0.00915 lb/ton) and then converting to tons.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;



- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.68 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by:

- a. multiplying the maximum process weight rate for extruder 1 (12.5 tons/hr) by the controlled emission factor (0.00915 lb/ton) derived by multiplying the AP-42* emissions



factor for grain handling (0.061 lb/ton) by a control efficiency of 85% to account for the product collecting cyclones;

- b. multiplying the maximum process weight rate for extruder 2 (12.5 tons/hr) by the controlled emission factor (0.00915 lb/ton) derived by multiplying the AP-42* emissions factor for grain handling (0.061 lb/ton) by a control efficiency of 85% to account for the product collecting cyclones;
- c. multiplying the combined maximum process weight rate for extruder 3 and extruder 4 (25 tons/hr) by the controlled emission factor (0.00915 lb/ton) derived by multiplying the AP-42* emissions factor for grain handling (0.061 lb/ton) by a control efficiency of 85% to account for the product collecting cyclones; and
- d. adding f)(1)a.i., f)(1)a.ii. and f)(1)a.iii. above.

*Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for headhouse and grain handling.

Emissions Limitation:

Particulate emissions shall not exceed 2.06 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

Emissions Limitation:

Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g) Miscellaneous Requirements
 - (1) None.



9. P006, P006 Rotex Scrn (PF)

Operations, Property and/or Equipment Description:

Rotex screening, coating and finished product storage (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.01 lbs/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 4.5 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck and rail for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck and rail for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by:
 - i. multiplying d)(1)b. by the uncontrolled emission factor (0.0125 lb/ton) to determine the emissions from screening;
 - ii. multiplying d)(1)b. by the controlled emission factor (0.0075 lb/ton) to determine the emissions from storage; and
 - iii. adding d)(1)c.i. to d)(1)c.ii. and then converting the result into tons.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 1.01 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by:

- a. multiplying the maximum process weight rate for rotex screening (50 tons/hr) by the uncontrolled AP-42* emission factor for crushed stone screening (0.0125 lb/ton);
- b. multiplying the maximum process weight rate for storage (50 tons/hr) by the controlled emission factor (0.0075 lb/ton) derived by multiplying the AP-42** emissions factor for grain storage (0.025 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system; and
- c. adding f)(1)a.i. to f)(1)a.ii. above.

*Table 11.19.2-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for crushed stone screening.

**Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a grain storage bin.

Emissions Limitation:

Particulate emissions shall not exceed 4.5 tons per rolling, 12-month period.



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Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



10. P007, P007 PF Product Pkg

Operations, Property and/or Equipment Description:

finished product bagging (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.05 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 0.22 ton per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The weight of all ingredients unloaded by truck and rail for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck and rail for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by multiplying d)(1)b. by the controlled emission factor (0.0009 lb/ton) and then converting to tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.



These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by multiplying the maximum process weight rate (50 tons/hr) by the controlled emission factor (0.0009 lb/ton) derived by multiplying the AP-42* emissions factor for feed shipping (0.0033 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system.

*Table 9.9.1-2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for feed shipping at an animal feed mill.

Emissions Limitation:

Particulate emissions shall not exceed 0.22 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.



11. P008, P008 Biscuit SS&M

Operations, Property and/or Equipment Description:

Raw ingredient screening, pre-mix storage and mixing (biscuit operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.43 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 0.39 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 70,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck for the biscuit operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck for the biscuit operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by:
 - i. multiplying d)(1)b. by the controlled emission factor (0.00375 lb/ton) to determine the emissions from screening;
 - ii. multiplying d)(1)b. by the controlled emission factor (0.0075 lb/ton) to determine the emissions from storage; and
 - iii. adding d)(1)c.i. to d)(1)c.ii. and then converting the result into tons.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.43 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by:

- a. multiplying the maximum process weight rate for screening (100 tons/hr) by the controlled emission factor (0.00375 lb/ton) derived by multiplying the AP-42* emissions factor for crushed stone screening (0.0125 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system;
- b. multiplying the maximum process weight rate for storage (6.25 tons/hr) by the controlled emission factor (0.0075 lb/ton) derived by multiplying the AP-42** emissions factor for grain storage (0.025 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system; and
- c. adding f)(1)a.i. to f)(1)a.ii. above.

*Table 11.19.2-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for crushed stone screening.

**Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a grain storage bin.

Emissions Limitation:

Particulate emissions shall not exceed 0.39 ton per rolling, 12-month period.



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Effective Date: 8/13/2009

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



12. P009, P009 Milling (B)

Operations, Property and/or Equipment Description:

Biscuit milling, 1 hammermill utilizing a product collecting baghouse, and raw mix storage (biscuit operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.13 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 0.68 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See c)(2)b. below.
d.	OAC rule 3745-17-08	See c)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See c)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 70,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The weight of all ingredients unloaded by truck for the biscuit operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck for the biscuit operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by:
 - i. multiplying d)(1)b. by the controlled emission factor (0.012 lb/ton) to determine the emissions from milling;
 - ii. multiplying d)(1)b. by the controlled emission factor (0.0075 lb/ton) to determine the emissions from storage; and
 - iii. adding d)(1)c.i. to d)(1)c.ii. and then converting the result into tons.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

- each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.13 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by:

- a. multiplying the maximum process weight rate for milling (6.25 tons/hr) by the controlled emission factor (0.012 lb/ton) derived by multiplying the AP-42* emissions factor for grain milling (1.2 lb/ton) by a control efficiency of 99% to account for the product collecting baghouse;
- b. multiplying the maximum process weight rate for storage (6.25 tons/hr) by the controlled emission factor (0.0075 lb/ton) derived by multiplying the AP-42** emissions factor for grain storage (0.025 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system; and
- c. adding f)(1)a.i. to f)(1)a.ii. above.

*Table 9.9.1-2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a hammermill at an animal feed mill.

**Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a grain storage bin.

Emissions Limitation:

Particulate emissions shall not exceed 0.68 ton per rolling, 12-month period.



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Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



13. P010, P010 Biscuit Picking

Operations, Property and/or Equipment Description:

finished product storage and bagging (biscuit operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.06 lb/hr. See b)(2)a. below. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	PE shall not exceed 0.29 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(B)	See b)(2)b. below.
d.	OAC rule 3745-17-08	See b)(2)c. below.
e.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.



(2) Additional Terms and Conditions

- a. The hourly PE limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The maximum annual ingredient throughput for this emissions unit shall not exceed 70,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for this emissions unit; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. The weight of all ingredients unloaded by truck for the biscuit operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck for the biscuit operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions, in tons, calculated by:
 - i. multiplying d)(1)b. by the controlled emission factor (0.0075 lb/ton) to determine the emissions from storage;
 - ii. multiplying d)(1)b. by the controlled emission factor (0.0009 lb/ton) to determine the emissions from bagging; and
 - iii. adding d)(1)c.i. to d)(1)c.ii. and then converting the result into tons.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by:

- a. multiplying the maximum process weight rate for storage (6.25 tons/hr) by the controlled emission factor (0.0075 lb/ton) derived by multiplying the AP-42* emissions factor for grain storage (0.025 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system;
- b. multiplying the maximum process weight rate for bagging (6.25 tons/hr) by the controlled emission factor (0.0009 lb/ton) derived by multiplying the AP-42** emissions factor for feed shipping (0.0033 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system; and
- c. adding f)(1)a.i. to f)(1)a.ii. above.

*Table 9.9.1-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for a grain storage bin.

**Table 9.9.1-2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for feed shipping at an animal feed mill.

Emissions Limitation:

Particulate emissions shall not exceed 0.29 tons per rolling, 12-month period.



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Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



14. Emissions Unit Group - Biscuit dryers: N004, N005,

EU ID	Operations, Property and/or Equipment Description
N004	17.5 mmBtu/hr natural gas- or propane-fired dryer; no. 4 burner (biscuit operation)
N005	17.5 mmBtu/hr natural gas- or propane-fired dryer; no. 5 burner (biscuit operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE), excluding emissions from fuel combustion, shall not exceed 2.25 lbs/hr. See b)(2)a. below. Emissions from natural gas and/or propane usage shall not exceed: 3.65 lbs Nitrogen Oxide (NO _x)/hr, 15.98 tons NO _x /yr; 0.29 lb Sulfur dioxide (SO ₂)/hr, 1.25 tons SO ₂ /yr; 1.47 lbs Carbon Monoxide (CO)/hr, 6.44 tons CO/yr; 0.13 lb PE/hr, 0.58 ton PE/yr; 0.19 lb Organic Compound (OC)/hr and 0.84 ton OC/yr.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	The combined PE from emissions units N004 and N005 shall not exceed 25.2 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(B)	See b)(2)b. below.
f.	OAC rule 3745-17-08	See b)(2)c. below.
g.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.

(2) Additional Terms and Conditions

- a. The hourly PE limitation and natural gas/propane combustion emission limitations for this emissions unit were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.

c) Operational Restrictions

- (1) The combined maximum annual ingredient throughput for emissions units N004 and N005 shall not exceed 70,000 tons based upon a rolling, 12-month summation of the throughput figures.



The permittee has existing records of the ingredient throughput for these emissions units; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit
 - a. The weight of all ingredients unloaded by truck for the biscuit operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck for the biscuit operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions for emissions units N004 and N005, in tons, calculated by multiplying d)(1)b. by the controlled emission factor (0.72 lb/ton) and then converting to tons.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and



b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 2.25 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by multiplying the maximum process weight rate (3.125 tons/hr) by the controlled emission factor (0.72 lb/ton) derived by multiplying the ODEQ* emissions factor for a pellet cooler (2.4 lbs/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system.

*Oregon Department of Environmental Quality - *Emission Factors for Grain Elevators, Seed Cleaning and Animal Feed Mills* (revised 4/25/00) for a pellet cooler.

Emissions Limitation:

The combined PE from emissions units N004 and N005 shall not exceed 25.2 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

Emissions Limitation:

Emissions from natural gas and/or propane usage shall not exceed:

- 3.65 lbs NO_x/hr and 15.98 tons NO_x/yr;
- 0.29 lb SO₂/hr and 1.25 tons SO₂/yr;
- 1.47 lbs CO/hr and 6.44 tons CO/yr;
- 0.13 lb PE/hr and 0.58 ton PE/yr; and
- 0.19 lb CO/hr and 0.84 ton CO/yr.



Applicable Compliance Method:

The hourly emissions limitations were established by multiplying the maximum total hourly natural gas or propane usage for the dryer (0.0175 MMcf/hr natural gas)(0.192 Mgal/hr propane) by the following emission factor for each pollutant in order to establish the worst-case hourly emission limitation for each pollutant:

<u>Pollutant</u>	<u>Emission Factor</u>
NO _x	19 lbs of NO _x /Mgal of propane
SO ₂	1.5 lbs of SO ₂ */Mgal of propane
CO	84 lbs of CO/MMcf of natural gas
PE	7.6 lbs of PE/MMcf of natural gas
OC	11 lbs of OC/MMCF of natural gas

Emission factors for propane usage are taken from Table 1.5-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for external combustion sources. Emission factors for natural gas usage are taken from Tables 1.4-1 and 1.4-2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for external combustion sources.

*The Emission Factor for SO₂ is derived by multiplying the AP-42 Emission Factor (0.1 lb SO₂/Mgal of propane) by the maximum sulfur content of the propane (15 grains/100 cf).

If required, the following test methods shall be used to demonstrate compliance with the hourly allowable emissions limitations:

<u>Pollutant</u>	<u>Test Method(s)</u>
NO _x	Method 7 or 7E of 40 CFR Part 60, Appendix A
SO ₂	Method 6 or 6C of 40 CFR Part 60, Appendix A
CO	Method 10 of 40 CFR Part 60, Appendix A
PE	Method 5 of 40 CFR Part 60, Appendix A
OC	Method 18, 25 or 25A of 40 CFR Part 60, Appendix A

The annual emissions limitations were calculated by multiplying the maximum hourly emission rate by 8,760 hours/year and dividing by 2,000 pounds/ton. Compliance with the annual emissions limitations will be assumed as long as compliance with the lb/hr limitations are maintained.

Emissions Limitation:

Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).



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g) Miscellaneous Requirements

(1) None.



15. Emissions Unit Group - Pet food dryers: N001, N002, N003,

EU ID	Operations, Property and/or Equipment Description
N001	10.5 mmBtu/hr natural gas- or propane-fired dryer vented to a cyclone; no. 1 burner (pet food operation)
N002	10.5 mmBtu/hr natural gas- or propane-fired dryer vented to a cyclone; no. 2 burner (pet food operation)
N003	10.5 mmBtu/hr natural gas- or propane-fired dryer vented to 2 cyclones; no. 3 burner (pet food operation)

- a) 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).

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.

- (1) None.

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.

- (2) b)(1)b., c)(1), d)(1), e)(1) and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE), excluding emissions from fuel combustion, shall not exceed 1.35 lbs/hr.</p> <p>See b)(2)a. below.</p> <p>Emissions from natural gas and/or propane usage shall not exceed:</p> <p>2.19 lbs Nitrogen Oxide (NO_x)/hr, 9.57 tons NO_x/yr; 0.17 lb Sulfur dioxide (SO₂)/hr, 0.76 ton SO₂/yr; 0.88 lb Carbon Monoxide (CO)/hr, 3.86 tons CO/yr; 0.08 lb PE/hr,</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.35 ton PE/yr; 0.12 lb Organic Compound (OC)/hr and 0.51 ton OC/yr. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	The combined PE from emissions units N001, N002 and N003 shall not exceed 24.3 tons per rolling, 12-month period. See c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(B)	See b)(2)b. below.
f.	OAC rule 3745-17-08	See b)(2)c. below.
g.	40 Code of Federal Regulations Part 60, Subpart DD (NSPS DD)	See b)(2)d. below.

(2) Additional Terms and Conditions

- a. The hourly PE limitation and natural gas/propane combustion emission limitations for this emissions unit were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emissions limitation.
- b. This emissions unit is exempt from the visible particulate fugitive dust emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- d. The provisions of NSPS Subpart DD for grain terminal elevators do not apply to this facility according to 40 CFR Part 60, Subpart DD Section 60.301(c) because the facility manufactures pet food.



c) Operational Restrictions

- (1) The combined maximum annual ingredient throughput for emissions units N001, N002 and N003 shall not exceed 450,000 tons based upon a rolling, 12-month summation of the throughput figures.

The permittee has existing records of the ingredient throughput for these emissions units; therefore, the first year of accumulating monthly ingredient throughput limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The weight of all ingredients unloaded by truck and rail for the pet food operation, in tons;
 - b. The rolling, 12-month summation of the weight of all ingredients unloaded by truck and rail for the pet food operation, in tons; and
 - c. The rolling, 12-month summation of particulate emissions for emissions units N001, N002 and N003, in tons, calculated by multiplying d)(1)b. by the controlled emission factor (0.0108 lb/ton) and then converting to tons.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each exceedance of the rolling, 12-month ingredient throughput limitation; and
 - b. each exceedance of the rolling, 12-month particulate emissions limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part A – Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

Particulate emissions shall not exceed 1.35 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly limitation may be calculated by multiplying the maximum process weight rate (12.5 tons/hr) by the controlled emission factor (0.0108 lb/ton) derived by multiplying the ODEQ* emissions factor for a pellet cooler (0.36 lb/ton) by a control efficiency of 70% to account for a "weather-tight" enclosure system.

*Oregon Department of Environmental Quality - *Emission Factors for Grain Elevators, Seed Cleaning and Animal Feed Mills* (revised 4/25/00) for a pellet cooler equipped with a cyclone.

Emissions Limitation:

The combined PE from emissions units N001, N002 and N003 shall not exceed 24.3 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitation shall be based upon the record keeping requirements specified in d)(1).

Emissions Limitation:

Emissions from natural gas and/or propane usage shall not exceed:



2.19 lbs NO_x/hr and 9.57 tons NO_x/yr;
0.17 lb SO₂/hr and 0.76 ton SO₂/yr;
0.88 lb CO/hr and 3.86 tons CO/yr;
0.08 lb PE/hr and 0.35 ton PE/yr; and
0.12 lb CO/hr and 0.51 ton CO/yr.

Applicable Compliance Method:

The hourly emissions limitations were established by multiplying the maximum total hourly natural gas or propane usage for the dryer (.0105 MMcf/hr natural gas)(.115 Mgal/hr propane) by the following emission factor for each pollutant in order to establish the worst-case hourly emission limitation for each pollutant:

<u>Pollutant</u>	<u>Emission Factor</u>
NO _x	19 lbs of NO _x /Mgal of propane
SO ₂	1.5 lbs of SO ₂ */Mgal of propane
CO	84 lbs of CO/MMcf of natural gas
PE	7.6 lbs of PE/MMcf of natural gas
OC	11 lbs of OC/MMCF of natural gas

Emission factors for propane usage are taken from Table 1.5-1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for external combustion sources. Emission factors for natural gas usage are taken from Tables 1.4-1 and 1.4-2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for external combustion sources.

*The Emission Factor for SO₂ is derived by multiplying the AP-42 Emission Factor (0.1 lb SO₂/Mgal of propane) by the maximum sulfur content of the propane (15 grains/100 cf).

If required, the following test methods shall be used to demonstrate compliance with the hourly allowable emissions limitations:

<u>Pollutant</u>	<u>Test Method(s)</u>
NO _x	Method 7 or 7E of 40 CFR Part 60, Appendix A
SO ₂	Method 6 or 6C of 40 CFR Part 60, Appendix A
CO	Method 10 of 40 CFR Part 60, Appendix A
PE	Method 5 of 40 CFR Part 60, Appendix A
OC	Method 18, 25 or 25A of 40 CFR Part 60, Appendix A

The annual emissions limitations were calculated by multiplying the maximum hourly emission rate by 8,760 hours/year and dividing by 2,000 pounds/ton. Compliance with the annual emissions limitations will be assumed as long as compliance with the lb/hr limitations are maintained.

Emissions Limitation:

Visible PE from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105186

Facility ID: 0124010128

Effective Date: 8/13/2009

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.