



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

9/8/2011

Larry Krause
Keebler Company
One Trade Street
Mariemont
Cincinnati, OH 45227

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431070662
Permit Number: P0108459
Permit Type: Administrative Modification
County: Hamilton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
HCDOES; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Oven 1 = Emissions unit P017 yeast-leavened products oven

3. Facility Emissions and Attainment Status:

Keebler Company has been operating as a non-Title V air contaminant source of emissions until they discovered some of the flavors they use contain VOC emissions (ethanol and propylene glycol). Also VOC emissions (ethanol) are created from the biological activity in yeast-leavened products. Together, the actual facility wide VOC emissions are above 100 tons per year (TPY).

The facility requests Synthetic Minor limitations on VOC emissions to avoid Title V operating regulations for several of their operations.

To accomplish that, Ohio EPA is issuing this draft synthetic minor permitting action (P0108459; emissions unit P017) along with three other draft synthetic minor permitting actions (P0108520; emissions unit P027); (P0108519; emissions unit P028); and (P0108509; emissions units P018, P019, P020, P025, and P026).

4. Source Emissions:

Oven 1 (P017): VOC emissions are created from yeast-leavened products, not from flavors. Permit P0098205 previously did not establish VOC emission limitations.

- a. Potential VOC emissions equal 579.5 TPY; with 95% control efficiency from the catalytic oxidizer VOC emissions equal 29 TPY. The facility wishes to restrict VOC emissions to 25 TPY to avoid Title V permit requirements.

- b. BAT has been determined to be compliance with OAC rule 3745-21-12(D)(1)

“Except where exempted under paragraph (D)(2) of this rule, any owner or operator of a commercial bakery oven facility that is subject to this rule shall install and operate a VOC emission control system that reduces the VOC emissions from each bakery oven by at least ninety-five per cent by weight (i.e., an overall control efficiency of at least ninety-five per cent by weight).”

- c. NOx emissions are not addressed because these emissions result from the operation of the control device. Nate Stroup’s original draft of the P017 permit in 2009 did not include NOx emissions.



- d. Hourly emission limits were set to potential to emit to avoid hourly record keeping requirements.
- e. Acetaldehyde is a present HAP and Toxin in Keebler's Oven1 emissions. Acetaldehyde emissions are less than 1 ton per year thus modeling is not necessary for toxins and emission limitations are not necessary for HAPs.
- f. Ammonia is a Toxin emitted from other ovens on site but not from Oven 1.
- g. GHG (CO_{2e}) emissions are less than 100,000 TPY for the entire facility, thus GHG rules do not apply.

5. Conclusion:

With this permitting action along with the other above mentioned permitting actions, this facility will remain a non-Title V facility limited to 92.9 TPY of VOC emissions.

6. Please provide additional notes or comments as necessary:

None.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	25

Prepared by Amy Lukens
July 28, 2011

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Keebler Company

Issue Date: 9/8/2011

Permit Number: P0108459

Permit Type: Administrative Modification

Permit Description: Permitted VOC emission limits for a yeast-leavened products oven to avoid Title V.

Facility ID: 1431070662

Facility Location: Keebler Company

One Trade Street, Mariemont

Cincinnati, OH 45227

Facility Description: Cookie and Cracker Manufacturing

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mike Kramer at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy., Cincinnati, OH 45219-2660 or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Keebler Company**

Facility ID:	1431070662
Permit Number:	P0108459
Permit Type:	Administrative Modification
Issued:	9/8/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Keebler Company

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Authorization

Facility ID: 1431070662

Application Number(s): A0042076

Permit Number: P0108459

Permit Description: Permitted VOC emission limits for a yeast-leavened products oven to avoid Title V.

Permit Type: Administrative Modification

Permit Fee: \$375.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/8/2011

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Keebler Company
One Trade Street
Mariemont
Cincinnati, OH 45227

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:

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

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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108459

Permit Description: Permitted VOC emission limits for a yeast-leavened products oven to avoid Title V.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P017
Company Equipment ID:	Oven #1
Superseded Permit Number:	P0098205
General Permit Category and Type:	Not Applicable



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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Hamilton County Dept. of Environmental Services 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 submitting¹ 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 emissions 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.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



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.

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.

B. Facility-Wide Terms and Conditions

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.
 - (1) 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.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. P017, Oven #1

Operations, Property and/or Equipment Description:

Oven #1

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).

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

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., d)(4), d)(5), and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	The requirements of this rule include compliance with OAC rule 3745-17-07 and OAC rule 3745-21-12(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Volatile Organic Compound (VOC) emissions shall not exceed 25 tons per year as a rolling, 12-month summation. See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-21-12(D)(1)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation

of the emissions, upon issuance of this permit. The emissions of VOCs from this emissions unit shall not exceed 25 tons per year, based upon a rolling, 12-month summation of the emissions.

- b. The permittee shall operate a VOC emission control system that reduces the VOC emissions from each bakery oven by at least ninety-five percent by weight (i.e., an overall control efficiency of at least ninety-five percent by weight).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly operate and maintain equipment to continuously monitor and record the inlet temperature and the temperature rise across the catalyst bed.
 - (2) While operating the bakery oven, the permittee shall maintain the parameters listed in paragraphs (C)(1)(a) to (C)(1)(c) of OAC rule 3745-21-12 within the baseline operational data established during the most recent compliance test(s) that demonstrate compliance.
 - (3) The permittee shall perform monthly inspections of the VOC emission control system and monitoring equipment to assure that the control system is operating properly, and that no leaks or malfunctions have occurred or are occurring.

The permittee shall record the results of each inspection in a permanent log to be retained on-site for a period of not less than five years and shall make the log available to the director or any authorized representative of the director for review during normal business hours.
 - (4) The permittee shall keep rolling 12-month production period records of the following operational data for each yeast-leavened product for each bakery oven:
 - a. The amount of raw product processed in pounds per month;
 - b. The baker's percent yeast used (initial yeast and any spike yeast);
 - c. The fermentation time (total time and any spiking time);
 - d. The type of product baked; and
 - e. Any other information that the director may determine to be necessary for determining that the facility is operated in continuous compliance with this rule.
 - (5) The permittee shall calculate rolling 12- month VOC emissions for this emissions unit and shall record the emission factor used for each product, including a citation of the source of the emission factor, and the results of the VOC emission calculations.
 - (6) The permittee shall collect and record the following information on a daily basis:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment and the associated bakery oven.
 - b. All three-hour periods of operation during which the average temperature of the process vent stream immediately before the catalyst bed is more than 50 degrees Fahrenheit below the average temperature of the process vent stream during the most recent performance test that demonstrated that the source was in compliance, and all three-hour periods of operation during which the average temperature difference across the catalyst bed is less than eighty percent of the average temperature during the most recent performance test that demonstrated that the bakery oven was in compliance.
 - c. Any other information that the director may determine to be necessary for determining that the bakery oven is operating in continuous compliance with this rule.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
 - (2) The permittee shall submit quarterly deviation reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emissions shall not exceed 25 TPY, based on a rolling 12-month summation.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).
 - (3) The owner or operator shall submit to the appropriate Ohio Environmental Protection Agency district office or local air agency quarterly summaries of the records required in d)(6). These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
- f) Testing Requirements
- (1) Compliance with the emissions limitations and/or control requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 25 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the above VOC annual emission limitation shall be demonstrated by the record keeping requirements in d)(5).

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified 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).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency.
- c. The general provisions specified under paragraphs (A)(2) to (A)(5) of the rule 3745-21-10 of the Ohio Administrative Code shall apply to the compliance testing.
- d. The test method(s) and procedures of paragraph (C) of rule 3745-21-10 of the Administrative Code shall be followed, except as specified in OAC rule 3745-21-12(F)(2).

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be



conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.