



Environmental
Protection Agency

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

1/13/2012

Mr. Chuck McDaniel
Case Farms Winesburg Rendering Plant
P.O. Box 185
Winesburg, OH 44690

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

Facility ID: 0238002005
Permit Number: P0108942
Permit Type: Initial Installation
County: Holmes

Certified Mail

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Case Farms Winesburg Rendering Plant**

Facility ID:	0238002005
Permit Number:	P0108942
Permit Type:	Initial Installation
Issued:	1/13/2012
Effective:	1/13/2012
Expiration:	1/13/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
Case Farms Winesburg Rendering Plant

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Authorization

Facility ID: 0238002005
Application Number(s): A0043028
Permit Number: P0108942
Permit Description: New installation of 2 rendering processes, 3 boilers, and paved roadways and parking areas
Permit Type: Initial Installation
Permit Fee: \$3,400.00
Issue Date: 1/13/2012
Effective Date: 1/13/2012
Expiration Date: 1/13/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Case Farms Winesburg Rendering Plant
1818 Co Road 160
Winesburg, OH 44690

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

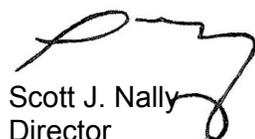
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0108942
Permit Description: New installation of 2 rendering processes, 3 boilers, and paved roadways and parking areas

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

Emissions Unit ID: F001
Company Equipment ID: Fugitive 1
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: 23.43 mmBtu/hr boilers

Emissions Unit ID:	B001
Company Equipment ID:	Boiler 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Boiler 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B003
Company Equipment ID:	Boiler 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Rendering operations

Emissions Unit ID:	P001
Company Equipment ID:	Scrubber 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Scrubber 2
Superseded Permit Number:	
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 Ohio EPA DAPC, Northeast 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 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.

¹Permittees 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. F001, Fugitive 1

Operations, Property and/or Equipment Description:

Paved roadways and parking areas

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. None.

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), as effective 11/30/01	Fugitive particulate matter of 10 microns or less (PM10) shall not exceed 6.6 tons/year. Fugitive particulate emissions (PE) shall not exceed 33.8 tons/year. No visible PE except for one minute during any 60-minute period. Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See b)(2)c. through b)(2)g.). See section b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)b.
c.	OAC rule 3745-17-07(B)(4)	Exempt, not located in an area identified in Appendix A of OAC rule 3745-17-08.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	Exempt, not located in an area identified in Appendix A of OAC rule 3745-17-08.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled PM10 emissions from this air contaminant source since the uncontrolled potential to emit for PM10 is less than 10 tons per year.
- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such

material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- f. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials be transported.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>Paved roadways and parking areas</u>	<u>Minimum inspection frequency</u>
All roads and parking areas	Weekly

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (3) The permittee shall maintain records of the following information:

- a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. The dates the control measures were implemented; and
- d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) 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 and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

Fugitive particulate matter of 10 microns or less (PM10) shall not exceed 6.6 tons/year.

Fugitive particulate emissions (PE) shall not exceed 33.8 tons/year.

Applicable Compliance Methods:

Compliance with the fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for paved roadways. Should further updates in AP-42 occur, the most current equations for paved roads shall be used. These emission limits were based on a maximum of 40,000 vehicle miles traveled per year, and a 95% control efficiency for PE and PM10.

b. Emissions Limitation:

No visible PE except for one minute during any 60-minute period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group -23.43 mmBtu/hr boilers: B001,B002,B003,

EU ID	Operations, Property and/or Equipment Description
B001	23.43 mmBtu/hr natural gas fired boiler number 1
B002	23.43 mmBtu/hr natural gas fired boiler number 2
B003	23.43 mmBtu/hr natural gas fired boiler number 3

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. None.

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), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.23lb/hr and 1.03 ton/year (tpy). Organic compound (OC) emissions shall not exceed 0.26lb/hr and 1.13tpy. Nitrogen oxides (NOx) emissions shall not exceed 1.2lb/hr and 5.13tpy. Carbon monoxide (CO) emissions shall not exceed 1.92lb/hr and 8.4tpy. Sulfur dioxide (SO ₂) emissions shall not exceed 0.023lb/hr and 0.1tpy. See sections b)(2)a. through b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 pound per million Btu of actual heat input.
e.	OAC rule 3745-18-06(A)	Exempt. See section b)(2)f.
f.	40 CFR Part 60, Subpart Dc	See sections b)(2)c. and b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled particulate (PE), organic compound (OC), nitrogen oxides (NO_x), carbon monoxide (CO), and sulfur dioxide (SO₂) emissions from this air contaminant source since the uncontrolled potentials to emit for PE, OC, NO_x, CO, and SO₂ are less than 10 tons per year.
- c. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be compliance with the terms and conditions of this permit. The requirements of OAC rule 3745-31-05(A) also include compliance with 40 CFR Part 60, Subpart Dc.
- d. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- e. The hourly emission limitations are based on the emissions unit's potential to emit (PTE) calculated using the unit's maximum input rating (23.43 mmBtu/hr).

Therefore, no monitoring, record keeping, and reporting are required to ensure ongoing compliance with these limitations.

- f. Fuel burning equipment that burns only natural gas is exempt from the requirements of OAC rule 3745-18-06.
- c) Operational Restrictions
- (1) The permittee shall only burn natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of the total amount of fuel combusted during each calendar month.
 - (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- e) Reporting Requirements
- (1) 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.
 - (2) Pursuant to the NSPS requirements, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date);
 - d. Date of performance testing (if required, at least 30 days prior to testing); and
 - e. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

Reports are to be sent to the Ohio Environmental Protection Agency, Northeast District Office and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

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. Emissions Limitations:

Particulate emissions (PE) shall not exceed 0.23 lb/hr and 1.03 ton/year (tpy).

Organic compound (OC) emissions shall not exceed 0.26lb/hr and 1.13tpy.

Nitrogen oxides (NOx) emissions shall not exceed 1.2 lb/hr and 5.13tpy.

Carbon monoxide (CO) emissions shall not exceed 1.92lb/hr and 8.4tpy.

Sulfur dioxide (SO₂) emissions shall not exceed 0.023 lb/hr and 0.1 tpy.

Applicable Compliance Methods:

The above emissions limitations are based on the emissions unit's PTE for each pollutant and were calculated using the following equations:

$$\text{lb/hr} = (\text{Emission Factor}) \times (23.43 \text{ mmBtu/hr})$$

$$\text{tpy} = (\text{lb/hr}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})$$

Emission Factors:

PE = 0.010 lb/mmBtu provided by the boiler manufacturer, CleaverBrooks

OC = 0.011 lb/mmBtu from AP-42, Section 1.4, Natural Gas Combustion (7/98)

NOx = 0.05 lb/mmBtu from AP-42, Section 1.4, Natural Gas Combustion (7/98)

CO = 0.082lb/mmBtu from AP-42, Section 1.4, Natural Gas Combustion (7/98)

SO₂= 0.001 lb/mmBtu provided by the boiler manufacturer, CleaverBrooks

Emission factors used in the PTE calculations are either from the boiler manufacturer or AP-42, whichever factor was higher. Emission factors from AP-42 in units of lb/mmscf were converted to lb/mmBtu by dividing by 1020.

b. Emissions Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emissions Limitation:

PE shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Rendering operations: P001,P002,

EU ID	Operations, Property and/or Equipment Description
P001	Rendering plant
P002	Rendering plant

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. d)(7)

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

a. None.

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(E)	Volatile organic compound (VOC) emissions shall not exceed 9.9 tons per year. See sections b)(2)b. through b)(2)g.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed 54 pounds per day and 9.9 tons per year. See section b)(2)h.
c.	OAC rule 3745-15-07(A)	See sections b)(2)a.i. through b)(2)a.v.
d.	ORC 3704.03(F)(3)(c) and (F)(4)	See section d)(7).

(2) Additional Terms and Conditions

a. Permit to Install and Operate P0108942 for emissions units P001 and P002 takes into account the following work practices (including the use of any applicable air pollution capture equipment) for the purpose of controlling odors from materials handling and processing:

- i. The permittee shall process only fresh offal materials within 24 hours of receipt.
 - ii. The permittee shall store all raw, skinned offal materials inside a building at all times.
 - iii. The permittee shall clean all processing equipment with hot water and disinfectant each day that the emissions unit is in operation.
 - iv. The direction of air flow through all process building openings (i.e. doors and windows) shall be into the building at all times that the emissions units are in operation.
 - v. The permittee shall close non-critical and critical process building openings during normal operations to the extent necessary to ensure that air flow through the building does not interfere with collection of odors by the capture hood(s) and associated fan(s) at all times that the emissions units are in operation. A critical process building opening is an opening that must remain open for materials transfer for some periods when the emissions units are in operation.
- b. Rendering processes P001 and P002 may be controlled by one of two identical wet scrubbers. The other scrubber is installed as backup. Each scrubber is capable of handling the total air flow from both rendering processes. The VOC emissions limitation of 54 pounds per day applies to total VOC emissions from both scrubbers.
 - c. Process building air shall be collected and vented to the scrubber(s) at all times the emissions units are in operation.
 - d. The permittee shall employ localized hooding to capture fugitive fumes from the screen separators, press augers, and presses that vent to the scrubber(s) at all times the emissions units are in operation.
 - e. The permittee shall collect all exhaust gases from the cookers and the cyclone separator through a closed vent system and shall vent the collected exhaust gases to a condenser that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
 - f. The permittee shall vent all of the condenser exhaust gases (non-condensables) to scrubber(s) that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
 - g. The permit for this air contaminant source takes into account the use of a condenser and wet scrubber, whenever this air contaminant source is in operation, with a minimum control efficiency of 49.9% for VOC, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
 - h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001,

in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

c) Operational Restrictions

- (1) The pressure drop across the scrubber(s) shall be maintained between 2 and 6 inches of water.
- (2) The scrubber(s) liquid shall be maintained at a minimum pH of 9.
- (3) The scrubber(s) liquid flow rate shall be maintained at a minimum of 400 gallons per minute.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range or limit for the pressure drop across the scrubber(s), the liquid flow rate, and the liquid pH shall be based upon the manufacturer's specifications in the permittee's application and section c) of these terms and conditions.
- (2) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the scrubber(s) (in pound per square inch, gauge), the scrubber(s) liquid flow rate (in gallons per minute), and the scrubber(s) liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the scrubber(s) liquid pH and the liquid flow rate on a continuous basis. The permittee shall record the pressure drop across the scrubber(s) on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records for the following information for each investigation:

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

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

- a. A description of the corrective action;
- b. The date the corrective action was completed;
- c. The date and time the deviation ended;
- d. The total period of time (in minutes) during which there was a deviation;
- e. The pressure drop, flow rate, and pH readings immediately after the corrective action was implemented; and
- f. The name(s) of the personnel who performed the work.

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

The range(s) and/or limit(s) for the pressure drop, liquid flow rate, and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or pH based upon the information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for these emissions units. In addition, approved revisions to the range of limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.

- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be more than 120 degrees Fahrenheit (65.6 degrees Celcius). Until a performance evaluation, as specified in d)(4) has been conducted, the condenser shall be operated and maintained in accordance with the value specified in d)(3).
- (4) The permittee shall conduct a performance evaluation on the condenser and cyclone separator during a four-month period that includes any four months from May through September, to determine the upper limit of the condenser exhaust temperature for efficient operation. After completing the condenser performance evaluation, the permittee shall report the findings to the Ohio EPA Northeast District Office within 30 days of completion. The permittee shall request to maintain the condenser exhaust temperature as specified in d)(3) or shall request that the condenser exhaust temperature be maintained within the value determined during the performance evaluation specified in d)(4).

- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit (or Celcius). The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. All 3-hour blocks of time, when the emissions unit(s) controlled by the condenser was/were in operation, during which the average temperature of the exhaust gases from the condenser was more than 11 degrees Fahrenheit above the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. A log or record of the downtime time for the capture (collection system), condenser, and monitoring equipment when the associated emissions unit(s) was/were in operation.
- (6) Whenever the monitored temperature of the exhaust gases from the condenser deviates from the range/limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. The date and time the deviation began;
 - b. The magnitude of the deviation at that time;
 - c. The date the investigation was conducted;
 - d. The name(s) of the personnel who conducted the investigation; and
 - e. The findings and recommendations.

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

- a. A description of the corrective action;
- b. The date corrective action was completed;
- c. The date and time the deviation ended;
- d. The total period of time (in minutes) during which there was a deviation;

- e. The temperature readings of the exhaust gas from the condenser immediately after the corrective action was implemented; and
- f. The name(s) of the personnel who performed the work.

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

The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions units. In addition, approved revisions to the exhaust gas temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit may be incorporated into this permit by means of an administrative modification.

- (7) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install and Operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Annual Permit Evaluation (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 of the Ohio EPA 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 identify in the annual PER the following information concerning the operations of the wet scrubber during the 12-month reporting period for these emissions units:
 - a. Each period of time (start time and date, and end time and date) when the pressure drop across the scrubber(s), the liquid flow rate, or the liquid pH was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;
 - b. Any period of time (start time and date, and end time and date) when the emissions units were in operation and the process emissions were not vented to the scrubber(s);

- c. Each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. Each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the pressure drop, liquid flow rate, or scrubber(s) liquid pH into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
 - e. Each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the condenser during the 12-month reporting period for these emissions units:
- a. Each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the condenser was outside of the range specified by this permit and/or outside of the acceptable range following any required compliance demonstration;
 - b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser;
 - c. Each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. Each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the condenser into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. Each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- 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. Emissions Limitation:
Volatile organic compound (VOC) emissions shall not exceed 9.9 tons per year.
Applicable Compliance Method:
Compliance may be based on the following equation:

VOC (tons/year) = 544.34 tons/day x 0.0994 lb/ton x 365 days/year x 1 ton/2000 lbs

Where:

544.34 tons/day = the maximum amount of raw material by-products that can be processed in a day;

0.0994lb/ton = scrubber controlled emission factor of 0.0994lb/ton, determined based on emission testing using U.S. EPA Method 25A performed in 1999 at Carolina By-Products in Fayetteville, NC;

365 days/year = the maximum number of days of operation in a year; and

1 ton/2000 lbs = conversion to tons.

b. Emissions Limitations:

VOC emissions shall not exceed 54 pounds per day and 9.9 tons per year.

Applicable Compliance Method:

- i. Compliance with the daily emissions limitation may be based on the following equation:

$$\text{VOC (pounds/day)} = 544.34 \text{ tons/day} \times 0.0994 \text{ lb/ton}$$

Where:

544.34 tons/day = the maximum amount of raw material by-products that can be processed in a day; and

0.0994 lb/ton = scrubber controlled emission factor of 0.0994 lb/ton, determined based on emission testing using U.S. EPA Method 25A performed in 1999 at Carolina By-Products in Fayetteville, NC.

- ii. Compliance with the annual emissions limitation may be based on the equation in section f)(1)a.

g) Miscellaneous Requirements

- (1) None.