



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

5/17/2013

Certified Mail

KENNETH KLOSTERMAN
KLOSTERMAN'S BAKING CO
1000 E. ROSS AVE
ST. BERNARD, OH 45217

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

Facility ID: 1431391306
Permit Number: P0113606
Permit Type: OAC Chapter 3745-31 Modification
County: Hamilton

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

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 Environmental Protection Agency (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 "Search for Permits" link under the Permitting topic on the Programs tab. 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 Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

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 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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

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

PUBLIC NOTICE

5/17/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

KLOSTERMAN'S BAKING CO

1000 E ROSS AVENUE,

St. Bernard, OH 45217

Hamilton County

FACILITY DESC.: Commercial Bakeries

PERMIT #: P0113606

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Modification of an existing oven in order to limit potential VOC emissions in order to avoid Title V and the Bakery Oven RACT.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Klosterman's Baking Company (permittee) currently operates one (1) natural gas-fired commercial bakery tunnel oven (P002) and three (3) Revent (permit exempt) ovens at their commercial bakery facility. The facility plans to install a new oven that will increase the potential to emit for VOC's to over 100 TPY. The purpose of this permit modification is to establish voluntary restrictions on the production of yeast-leavened products in order to avoid Title V permitting requirements and the Reasonable Achievable Control Technology (RACT) regulations through Ohio Administrative Code (OAC) rule 3745-21-12 for Commercial Bakery. Emission unit P002 was installed in 1972 therefore OAC rule 3745-31-05(A)(3) does not apply. The new natural gas-fired bakery oven (P003) is being permitted under a separate permitting action (P0114074) which will contain synthetic minor restrictions on the production of yeast-leavened products.

3. Facility Emissions and Attainment Status:

Emissions from the facility include volatile organic compounds (VOC) from the yeast-leavened baked products produced and the products of combustion from fuel burning in their natural gas ovens. The facility is located in Hamilton County which is designated nonattainment for ozone (i.e. VOC as a precursor of ozone) and attainment for the rest of the criteria pollutants.

4. Source Emissions:

Emissions of VOC from the 4 existing ovens prior to obtaining federally-enforceable restrictions are 79.68 tons per year (TPY) plus the addition of 44.62 TPY from the proposed oven equals 124.3 TPY based on uncontrolled potential to emit (PTE) evaluation; thereby, without obtaining these federally-enforceable restrictions, the permittee would be considered a major stationary source subject to Title V operating permit requirements and Reasonable Achievable Control Technology (RACT) regulations through Ohio Administrative Code (OAC) rule 3745-21-12 for Commercial Bakery ovens. This federally enforceable permit to install and operate (FEPTIO) will contain federally-enforceable restrictions on production to limit emissions of VOC to 63.54 TPY which when combined with the VOC emissions from the proposed oven (P003) and the three Revent ovens equals 91.52 TPY.

5. Conclusion:

The production restrictions contained within this FEPTIO allow the facility to avoid being deemed a major stationary source subject to Title V operating permit requirements and the RACT regulation of OAC rule 3745-21-12 for Commercial Bakery ovens. This FEPTIO includes rolling, 12-month limitations and recordkeeping/reporting requirements sufficient to maintain the synthetic minor permitting status for VOC emissions for this facility.



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 | 63.54 |



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
KLOSTERMAN'S BAKING CO**

| | |
|----------------|-----------------------------------|
| Facility ID: | 1431391306 |
| Permit Number: | P0113606 |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Issued: | 5/17/2013 |
| 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
KLOSTERMAN'S BAKING CO

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Draft Permit-to-Install and Operate

KLOSTERMAN'S BAKING CO

Permit Number: P0113606

Facility ID: 1431391306

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431391306
Application Number(s): A0047351
Permit Number: P0113606
Permit Description: Modification of an existing oven in order to limit potential VOC emissions in order to avoid Title V and the Bakery Oven RACT.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/17/2013
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:

KLOSTERMAN'S BAKING CO
1000 E ROSS AVENUE
St. Bernard, OH 45217

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(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



Draft Permit-to-Install and Operate

KLOSTERMAN'S BAKING CO

Permit Number: P0113606

Facility ID: 1431391306

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0113606

Permit Description: Modification of an existing oven in order to limit potential VOC emissions in order to avoid Title V and the Bakery Oven RACT.

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

Emissions Unit ID:

P002

Company Equipment ID:

Baker Perkins 960 Tunnel Oven

Superseded Permit Number:

P0111395

General Permit Category and Type:

Not Applicable



Draft Permit-to-Install and Operate
KLOSTERMAN'S BAKING CO
Permit Number: P0113606
Facility ID: 1431391306
Effective Date: To be entered upon final issuance

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 Southwest Ohio Air Quality Agency 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.



Draft Permit-to-Install and Operate

KLOSTERMAN'S BAKING CO

Permit Number: P0113606

Facility ID: 1431391306

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

KLOSTERMAN'S BAKING CO

Permit Number: P0113606

Facility ID: 1431391306

Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install and Operate
KLOSTERMAN'S BAKING CO
Permit Number: P0113606
Facility ID: 1431391306
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P002, Baker Perkins 960 Tunnel Oven

Operations, Property and/or Equipment Description:

Baker Perkins Tunnel Oven

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)a. and c)(1).

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(D) Voluntary restrictions to avoid Title V operating permit and RACT requirements. | Emissions of VOC shall not exceed 63.54 TPY based on a rolling, 12-month summation. See c)(1). |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum annual production rate for this emissions unit shall not exceed 18,000 tons of baked product, based upon a rolling, 12-month summation of the production rates.

(2) 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 baked products production rate, upon issuance of this permit.



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. for each baked product, the production rate, in tons;
- b. for each baked product, the emission rate, in pounds of VOC per ton of baked product, using the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97:

$$\text{VOC EF} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

where:

VOC EF = VOC Emission Factor in pounds VOC per ton of baked product

Y_i = initial baker's percent of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percent of yeast

t_s = spiking time in hours

- c. the rolling, 12-month summation of the baked products production rates as recorded in a., in tons, for the current month plus the preceding 11 calendar months;
- d. for each baked product, the VOC emissions calculated by multiplying the baked product production rate from a., in tons per month, by the emission rate calculated in b., in pounds of VOC per ton of baked product, and divided by 2000 pounds per ton, for an emission rate of tons of VOC per month;
- e. the total VOC emissions from this emissions unit, as the summation of the VOC emissions from the baked products as calculated in d., for an emission rate of tons of VOC per month; and
- f. the rolling, 12-month summation of the VOC emission rates as calculated in e., in tons, for the current month plus the preceding 11 calendar months.

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 (excursion) 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. all exceedances of the rolling, 12-month VOC Applicable Emission Limitation; and
 - ii. all exceedances of the rolling, 12-month limitation of the production rate.
 - 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).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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:

Emissions of VOC shall not exceed 63.54 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual rolling, 12-month VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0047351 for FEPTIO P0113606 using the VOC EF as calculated per AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97 for the worst case product:

$$\text{VOC EF} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$



Draft Permit-to-Install and Operate

KLOSTERMAN'S BAKING CO

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$$\text{VOC EF} = 0.95 (4.4) + 0.195 (5) - 0.51 (0) - 0.86 (0) + 1.90$$

$$\text{VOC EF} = 4.18 + 0.975 - 0 - 0 + 1.90$$

VOC EF = 7.06 pounds of VOC per ton of baked product

7.06 pounds of VOC/ton of baked product x 18,000 tons of baked product x 1
Ton/2000 pounds = 63.54 TPY of VOC.

- (2) Compliance with the operational restriction in c)(1) shall be demonstrated by the recordkeeping in d)(1).
- g) Miscellaneous Requirements
 - (1) None.