



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

5/28/2013

Certified Mail

John Aldrich  
HEARTHSIDE FOOD SOLUTIONS, LLC  
312 RADER RD  
McComb, OH 45858

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

Facility ID: 0332000110  
Permit Number: P0113370  
Permit Type: Initial Installation  
County: Hancock

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 Courier. 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](http://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 Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

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 Ohio EPA DAPC, Northwest District Office at (419)352-8461.

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  
Ohio EPA-NWDO; Michigan; Indiana; Canada



PUBLIC NOTICE  
5/28/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

HEARTHSIDE FOOD SOLUTIONS, LLC

312 RADER RD,  
McComb, OH 45858

Hancock County

FACILITY DESC.: Cookie and Cracker Manufacturing

PERMIT #: P0113370

PERMIT TYPE: Initial Installation

PERMIT DESC: Synthetic minor permit action to limit potential emissions of VOC for operations at a facility involved in the production of baked goods .

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: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. **Source Description:**

Hearthside Food Solutions, Inc. ("Hearthside") operates a bakery operation in McComb, Ohio (Hancock County) that produces cookies and crackers. Operations consist of ovens, sugar silos, flour silos, mixers, etc., used in the baking of yeast leavened and unleavened baked products.

3. **Facility Emissions and Attainment Status:**

The Hearthside facility has an unrestricted potential to emit for volatile organic compounds (VOC) of 231 tons per year but has requested synthetic minor restrictions to avoid Title V major source status. Hearthside is located in Hancock County. Hancock County is considered attainment for all criteria pollutants. Additionally, Hearthside is considered a true minor facility for potential emissions of hazardous air pollutants.

4. **Source Emissions:**

The Hearthside facility has requested a synthetic minor restriction limiting the production yeast-leavened baked products to 18,102 tons per rolling 12-month period. The production restriction will limit VOC emissions from the baking of yeast-leavened products to 83.00 tons per rolling 12-month period. The establishment of the synthetic minor requirements and limitations will result in a facility-wide potential to emit of 93.64 tons of VOC per year. Potential emissions of VOC generated at the facility from operations not associated with the baking of yeast-leavened products are as follows:

Unleavened Bake Ovens: 1.51 tons/year

0.88 mmBtu/hour Boiler: 0.01 ton/year

Spray Booth: 2.31 tons/year

Coders: 6.81 tons/year

5. **Conclusion:**

The synthetic minor restriction on yeast-leavened production to a rate of 18,102 tons per rolling 12-month period will limit the potential emissions of VOC from the Hearthside facility to below the Title V permitting of 100 tons per year.

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	83.00
NOx	55.81
CO	46.90



**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
HEARTHSIDE FOOD SOLUTIONS, LLC**

Facility ID:	0332000110
Permit Number:	P0113370
Permit Type:	Initial Installation
Issued:	5/28/2013
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  
HEARTHSIDE FOOD SOLUTIONS, LLC

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**Draft Permit-to-Install and Operate**  
HEARTHSIDE FOOD SOLUTIONS, LLC  
**Permit Number:** P0113370  
**Facility ID:** 0332000110

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0332000110  
Application Number(s): A0047078  
Permit Number: P0113370  
Permit Description: Synthetic minor permit action to limit potential emissions of VOC for operations at a facility involved in the production of baked goods .  
Permit Type: Initial Installation  
Permit Fee: \$4,600.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 5/28/2013  
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:

HEARTHSIDE FOOD SOLUTIONS, LLC  
312 RADER RD  
McComb, OH 45858

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:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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: P0113370  
 Permit Description: Synthetic minor permit action to limit potential emissions of VOC for operations at a facility involved in the production of baked goods .

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

**Emissions Unit ID: P014**  
 Company Equipment ID: P014  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P016**  
 Company Equipment ID: P016  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable

**Group Name: Bake Ovens (Non-Yeast Products)**

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Oven #4
Superseded Permit Number:	P0025385
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Oven #5
Superseded Permit Number:	P0025386
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Oven #6
Superseded Permit Number:	P0025387
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Oven #7
Superseded Permit Number:	P0025388
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P011</b>
Company Equipment ID:	Oven 13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P012</b>
Company Equipment ID:	Oven 02
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	Oven 03
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Ovens with Laminators**

<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	Oven #10
Superseded Permit Number:	P0025390



**Draft Permit-to-Install and Operate**  
 HEARTHESIDE FOOD SOLUTIONS, LLC  
**Permit Number:** P0113370  
**Facility ID:** 0332000110

**Effective Date:** To be entered upon final issuance

General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	Oven #11
Superseded Permit Number:	P0025391
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	Oven #12
Superseded Permit Number:	P0025392
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	Oven #9
Superseded Permit Number:	P0025393
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P015</b>
Company Equipment ID:	Baking Oven 08
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



**Draft Permit-to-Install and Operate**  
HEARTHSIDE FOOD SOLUTIONS, LLC  
**Permit Number:** P0113370  
**Facility ID:** 0332000110  
**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 Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> 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.

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<sup>1</sup> 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**  
HEARTHSIDE FOOD SOLUTIONS, LLC  
**Permit Number:** P0113370  
**Facility ID:** 0332000110  
**Effective Date:** To be entered upon final issuance

## **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



**Draft Permit-to-Install and Operate**  
HEARTHSIDE FOOD SOLUTIONS, LLC  
**Permit Number:** P0113370  
**Facility ID:** 0332000110  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group – Unleavened Bake Ovens: P002, P003, P004, P005, P011, P012, and P013**

EU ID	Operations, Property and/or Equipment Description
P002	Unleavened Bake Oven #4
P003	Unleavened Bake Oven #5
P004	Unleavened Bake Oven #6
P005	Unleavened Bake Oven #7
P011	Unleavened Bake Oven #13
P012	Unleavened Bake Oven #2
P013	Unleavened Bake Oven #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)	See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

a. The “Best Available Technology” (BAT) requirements for unleavened baking operations have been determined to be compliance with the nitrogen oxides (NOx) and carbon monoxide (CO) emissions as presented in the following table:



<b>Oven ID</b>	<b>NOx Emissions</b> (from natural gas combustion)	<b>CO Emissions</b> (from natural gas combustion)
P002	1.05 lbs of NOx/hour; 4.60 tons of NOx/year	0.88lb of CO/hour; 3.85 tons of CO/year
P003	0.95 lb of NOx/hour; 4.16 tons of NOx/year	0.80 lb of CO/hour; 3.50 tons of CO/year
P004	1.02 lbs of NOx/hour; 4.47 tons of NOx/year	0.86 lb of CO/hour; 3.77 tons of CO/year
P005	1.06 lbs of NOx/hour; 4.64 tons of NOx/year	0.89 lb of CO/hour; 3.90 tons of CO/year
P012	1.04 lbs of NOx/hour; 4.56 tons of NOx/year	0.87 lb of CO/hour; 3.81 tons of CO/year
P013	0.97 lb of NOx/hour; 4.25 tons of NOx/year	0.82 lb of CO/hour; 3.60 tons of CO/year

- a. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Hancock county.
- b. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- c. Operational Restrictions
  - (1) None.
- d. Monitoring and/or Recordkeeping Requirements
  - (1) None.
- 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 e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f. Testing Requirements
  - (1) Compliance with the Emissions Limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitations  
 1.05 lbs of NOx/hour; 4.60 tons of NOx/year (from emissions unit P002)  
 0.95 lb of NOx/hour; 4.16 tons of NOx/year (from emissions unit P003)  
 1.02 lbs of NOx/hour; 4.47 tons of NOx/year (from emissions unit P004)  
 1.06 lbs of NOx/hour; 4.64 tons of NOx/year (from emissions unit P005)



1.04 lbs of NOx/hour; 4.56 tons of NOx/year (from emissions unit P012)  
0.97 lb of NOx/hour; 4.25 tons of NOx/year (from emissions unit P013)

Applicable Compliance Method

The hourly NOx emission limitations were developed by multiplying the maximum rated capacity of each oven by an emission factor of 100 lbs of NOx/mmft<sup>3</sup> (AP-42 Table 1.4-1 [7/98]), and then dividing by 1020 to convert to Btu. The maximum rated capacity of each oven is listed below:

P002: 10.7 mmBtu/hour  
P003: 9.72 mmBtu/hour  
P004: 10.4 mmBtu/hour  
P005: 10.8 mmBtu/hour  
P012: 10.6 mmBtu/hour  
P013: 9.90 mmBtu/hour

If required, the permittee shall demonstrate compliance with the hourly NOx limitations in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

The annual limitations were developed by multiplying the maximum hourly emission rate of each oven by a maximum operating schedule of 8760 hours per year, and then dividing by 2000 lbs. Therefore, provided compliance with the hourly limitations is maintained, compliance with the annual limitations shall be demonstrated.

b. Emission Limitations

0.88 lb of CO/hour; 3.85 tons of CO/year (from emissions unit P002)  
0.80 lb of CO/hour; 3.50 tons of CO/year (from emissions unit P003)  
0.86 lb of CO/hour; 3.77 tons of CO/year (from emissions unit P004)  
0.89 lb of CO/hour; 3.90 tons of CO/year (from emissions unit P005)  
0.87 lb of CO/hour; 3.81 tons of CO/year (from emissions unit P012)  
0.82 lb of CO/hour; 3.60 tons of CO/year (from emissions unit P013)

Applicable Compliance Method

The hourly CO emission limitations were developed by multiplying the maximum rated capacity of each oven by an emission factor of 84 lbs of CO/mmft<sup>3</sup> (AP-42 Table 1.4-1 [7/98]), and then dividing by 1020 to convert to Btu. The maximum rated capacity of each oven is listed below:

P002: 10.7 mmBtu/hour  
P003: 9.72 mmBtu/hour  
P004: 10.4 mmBtu/hour  
P005: 10.8 mmBtu/hour  
P012: 10.6 mmBtu/hour  
P013: 9.90 mmBtu/hour

If required, the permittee shall demonstrate compliance with the hourly CO limitations in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.



**Draft Permit-to-Install and Operate**  
HEARTHSIDE FOOD SOLUTIONS, LLC

**Permit Number:** P0113370

**Facility ID:** 0332000110

**Effective Date:** To be entered upon final issuance

The annual limitations were developed by multiplying the maximum hourly emission rate of each oven by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance with the hourly limitations is maintained, compliance with the annual limitations shall be demonstrated.

g) Miscellaneous Requirements

(1) None



**2. Emissions Unit Group – Yeast Leavened Baking Operations: Bake Ovens with Laminators and Mixing & Proofing: P007, P008, P009, P010, P015, and P016**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P007	Yeast Leavened Bake Oven #10 with Laminator
P008	Yeast Leavened Bake Oven #11 with Laminator
P009	Yeast Leavened Bake Oven #12 with Laminator
P010	Yeast Leavened Bake Oven #9 with Laminator
P015	Yeast Leavened Bake Oven #8 with Laminator
P016	Mixing and Proofing

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

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)	9.17 lbs of volatile organic compounds (VOC) per ton of baked product (see b)(2)a.)  See b)(2)b.
b.	OAC rule 3745-31-05(D)	83.00 tons of VOC per rolling 12-month period from P007, P008, P009, P010, P015, and P016, combined (see c)(1))
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)e.



(2) Additional Terms and Conditions

- a. VOC emissions are generated from yeast-leavened baking operations which involve mixing, proofing, laminating, and baking. Bakery dough is mechanically mixed (1<sup>st</sup> mix) and then sent for proofing (1<sup>st</sup> proofing) to allow dough to react with yeast under moist conditions. Following the 1<sup>st</sup> proofing, material is sent back for additionally mixing (2<sup>nd</sup> mix) and then followed by an additional proofing step (2<sup>nd</sup> proofing). Final proofed material is sent to one of five bakery ovens (P007, P008, P009, P010, and P015) at the facility which are used to process yeast-leavened material. The bakery ovens are natural gas/direct-fired units, each equipped with a laminator to layer dough prior to entering the bake oven.
- b. The “Best Available Technology” (BAT) requirements for yeast-leavened baking operations have been determined to be the following:
  - i. A limit of 9.17 pounds of VOC per ton of baked product. This limitation involves the combined VOC emissions generated from mixing (1<sup>st</sup>& 2<sup>nd</sup> mixes), proofing (1<sup>st</sup>& 2<sup>nd</sup> proofing), laminating, and baking. It should be noted that the VOC limitation includes emissions from the direct firing of natural gas in the bake oven.
  - ii. Compliance with the operational restriction and rolling, 12-month VOC emission limitation established under OAC rule 3745-31-05(D).
  - iii. Nitrogen oxides (NOx) and carbon monoxide (CO) emission limitations for each individual bake oven associated with natural gas combustion as presented in the following table:

Oven ID	NOx Emissions (from natural gas combustion)	CO Emissions (from natural gas combustion)
P007	1.39lbsNOx/hour; 6.09 tonsNOx/year	1.17 lbs CO/hour; 5.12 tons CO/year
P008	1.45lbsNOx/hour; 6.35 tonsNOx/year	1.22 lbs CO/hour; 5.34 tons CO/year
P009	1.45lbsNOx/hour; 6.35 tonsNOx/year	1.22 lbs CO/hour; 5.34 tons CO/year
P010	1.45 lbsNOx/hour; 6.35 tonsNOx/year	1.22 lbs CO/hour; 5.34 tons CO/year
P015	0.91lbNOx/hour; 3.99 tonsNOx/year	0.76 lb CO/hour; 3.33 tons CO/year

- c. This permit establishes a federally enforceable emission limitation of 83.00 tons of VOC per rolling 12-month period from emission units P007, P008, P009, P010, P015, and P016, combined. The federally enforceable VOC limitation is being established in order to avoid Title V applicability and is based on the operational restriction contained in c)(1).
- d. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii),



Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Hancock county.

- e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) **Operational Restrictions**

- (1) The permittee has requested federally enforceable limitations for the purpose of avoiding Title V permitting requirements (see b)(2)c.). This permit establishes an operational restriction to limit the maximum annual production rate of yeast-leavened baked products to 18,102 tons per year based on a rolling, 12-month summation. The operational restriction shall be based on the production rate from emissions units P007, P008, P009, P010, and P015, combined. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

<b>Month(s)</b>	<b>Maximum Allowable Production Rate of Yeast-Leavened Baked Products (tons)</b>
1	4,500
1-2	7,200
1-3	10,800
1-4	14,400
1-12	18,102

Beginning the first month after the first 12 months of operation following issuance of this permit, the rolling, 12-month production rate of all yeast-leavened baked products from P007, P008, P009, P010, and P015 combined, shall not exceed 18102 tons.

- (2) The permittee shall burn only natural gas in this emissions unit.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for purposes of demonstrating compliance with the production limitation of 18,102 tons of yeast-leavened baked products per rolling, 12-month period:
  - a. The production rate of all yeast-leavened baked products from P007, P008, P009, P010, and P015, combined, in tons (summation of the monthly production rate from each emissions unit);
  - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative production rate of all yeast-leavened baked products from P007, P008, P009, P010, and P015, combined, in tons; and



- c. Beginning the first month after the first 12 months of operation following issuance of this permit, the rolling 12-month production rate of all yeast-leavened baked products from P007, P008, P009, P010, and P015, combined, in tons.
      - (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) 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. during the first 12 months of operation following issuance of this permit, any exceedances of the maximum allowable cumulative production level of yeast-leavened baked products specified in c)(1); and
        - ii. after the first 12 months of operation following issuance of this permit, any exceedances of the rolling 12-month production limitation of yeast-leavened baked products specified in c)(1).the probable cause of each deviation (excursion);
      - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
      - c. 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).
    - (2) 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 e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



- a. Emission Limitation  
9.17 lbs of VOC per ton of baked product

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[Compliance with the pound per ton limitation was demonstrated by the results of stack testing conducted on February 26-28, 2012.]

- b. Emission Limitation  
83.00 tons of VOC per rolling, 12-month period (from emissions units P007, P008, P009, P010, P015, and P016, combined)

Applicable Compliance Method

The VOC limitation was established by multiplying the emission limitation of 9.17 pounds of VOC per ton of yeast-leavened baked product by a maximum yeast-leavened baked products production rate of 18,102 tons per rolling, 12-month period. Therefore, provided compliance is shown with the pound of VOC per ton limitation and the maximum production restriction, compliance with the rolling 12-month VOC limitation shall also be demonstrated.

- c. Emission Limitations  
1.39 lbs of NOx/hour; 6.09 tons of NOx/year (from emissions unit P007)  
1.45 lbs of NOx/hour; 6.35 tons of NOx/year (from emissions unit P008)  
1.45 lbs of NOx/hour; 6.35 tons of NOx/year (from emissions unit P009)  
1.45 lbs of NOx/hour; 6.35 tons of NOx/year (from emissions unit P010)  
0.91 lb of NOx/hour; 3.99 tons of NOx/year (from emissions unit P015)

Applicable Compliance Method

The hourly NOx emission limitations were developed by multiplying the rated maximum capacity of each oven by an emission factor of 100 lbs of NOx/mmft<sup>3</sup> (AP-42 Table 1.4-1 [7/98]) and dividing by 1020 to convert to Btu. The maximum rated capacity of each oven is listed below:

- P007: 14.2 mmBtu/hour
- P008: 14.8 mmBtu/hour
- P009: 14.8 mmBtu/hour
- P010: 14.8 mmBtu/hour
- P015: 9.24 mmBtu/hour

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitations in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

The annual limitations were developed by multiplying the maximum hourly emission rate of each oven by a maximum operating schedule of 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, provided compliance with the



hourly limitations is maintained, compliance with the annual limitations shall also be demonstrated.

d. Emission Limitations

- 1.17 lbs of CO/hour; 5.12 tons of CO/year (from emissions unit P007)
- 1.22 lbs of CO/hour; 5.34 tons of CO/year (from emissions unit P008)
- 1.22 lbs of CO/hour; 5.34 tons of CO/year (from emissions unit P009)
- 1.22 lbs of CO/hour; 5.34 tons of CO/year (from emissions unit P010)
- 0.76 lb of CO/hour; 3.33 tons of CO/year (from emissions unit P015)

Applicable Compliance Method

The hourly CO emission limitations were developed by multiplying the maximum rated capacity of each oven by an emission factor of 84 lbs of CO/mmft<sup>3</sup> (AP-42 Table 1.4-1 [7/98]) and dividing by 1020 to convert to Btu. The maximum rated capacity of each oven is listed below:

- P007: 14.2 mmBtu/hour
- P008: 14.8 mmBtu/hour
- P009: 14.8 mmBtu/hour
- P010: 14.8 mmBtu/hour
- P015: 9.24 mmBtu/hour

If required, the permittee shall demonstrate compliance with the hourly CO limitations in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

The annual limitations were developed by multiplying the maximum hourly emission rate of each oven by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance with the hourly limitations is maintained, compliance with the annual limitations shall also be demonstrated.

g) **Miscellaneous Requirements**

- (1) None