



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

7/19/2013

Rick Stemm
New Bakery of Ohio Inc
3005 East pointe Dr.
Zanesville, OH 43701

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

Facility ID: 0660010244
Permit Number: P0115010
Permit Type: OAC Chapter 3745-31 Modification
County: Muskingum

Certified Mail

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, Zanesville Times Recorder. 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	Ohio EPA DAPC, Southeast District Office 2195 Front Street Logan, OH 43138
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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, Southeast District Office at (740)385-8501.

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-SEDO; West Virginia

PUBLIC NOTICE

7/19/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

New Bakery of Ohio Inc
3005 Eastpointe Dr,
Zanesville, OH 13870
Muskingum County

FACILITY DESC.: Commercial Bakeries

PERMIT #: P0115010

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: This is a Chapter 31 FEPTIO for one (1) spiral 1080 bakery oven due to the facility increasing the lbs/hr production rate, affecting the short term VOC limits. Federally enforceable limits of VOC emissions are requested below 100 TPY for the bakery oven to avoid being a major Title V source.

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: Mykal Mercer, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



Permit Strategy Write-Up
New Bakery of Ohio Inc
Permit Number: P0115010
Facility ID: 0660010244



Permit Strategy Write-Up

Check all that apply:

Synthetic Minor Determination

Netting Determination

1. Source Description:

This Chapter 31 mod FEPTIO is for the 1,080 bakery oven (P001) with a maximum heat input of 4.7 mmBtu operated by natural gas.

2. Facility Emissions and Attainment Status:

New Bakery of Ohio, Inc. (Eastpointe facility) is an existing bread bakery facility located at 3005 Eastpointe Drive in Zanesville, Ohio (Muskingum County), which is currently in attainment for all criteria pollutants. This facility is not located within the city limits of Zanesville, therefore, not in an Appendix A area. This facility was installed in 2001 and was modified due to adding a new bun type.

3. Source Emissions:

The facility is requesting federally enforceable restrictions on the bakery oven in order to avoid being a major Title V source by limiting VOC emissions below 100 TPY (93.5 TPY, as a rolling, 12-month summation). The maximum annual production rate for this emissions unit shall not exceed 31,375 tons of baked product, based upon a rolling, 12-month summation of the production rates.

4. Conclusion:

The emission limitations, monitoring, and record keeping requirements in this permit are sufficient to restrict the source below major source thresholds.

5. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE (stack)	0.41
NO _x	2.02
VOC	93.5



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
New Bakery of Ohio Inc**

Facility ID:	0660010244
Permit Number:	P0115010
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	7/19/2013
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
New Bakery of Ohio Inc

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Draft Permit-to-Install and Operate

New Bakery of Ohio Inc

Permit Number: P0115010

Facility ID: 0660010244

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0660010244
Application Number(s): A0047505, A0048156
Permit Number: P0115010
Permit Description: This is a Chapter 31 FEPTIO for one (1) spiral 1080 bakery oven due to the facility increasing the lbs/hr production rate, affecting the short term VOC limits. Federally enforceable limits of VOC emissions are requested below 100 TPY for the bakery oven to avoid being a major Title V source.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/19/2013
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:

New Bakery of Ohio Inc
3005 Eastpointe Dr
Zanesville, OH 13870

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, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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

New Bakery of Ohio Inc

Permit Number: P0115010

Facility ID: 0660010244

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0115010

Permit Description: This is a Chapter 31 FEPTIO for one (1) spiral 1080 bakery oven due to the facility increasing the lbs/hr production rate, affecting the short term VOC limits. Federally enforceable limits of VOC emissions are requested below 100 TPY for the bakery oven to avoid being a major Title V source.

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

Emissions Unit ID:	P001
Company Equipment ID:	Bakery Oven
Superseded Permit Number:	06-06403
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

New Bakery of Ohio Inc

Permit Number: P0115010

Facility ID: 0660010244

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, Southeast 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.

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

New Bakery of Ohio Inc

Permit Number: P0115010

Facility ID: 0660010244

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

New Bakery of Ohio Inc

Permit Number: P0115010

Facility ID: 0660010244

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

New Bakery of Ohio Inc

Permit Number: P0115010

Facility ID: 0660010244

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, Bakery Oven

Operations, Property and/or Equipment Description:

One bakery oven with a maximum hourly production rate of 10,148 lbs/hr (restricted 31,375 tons/yr) of baked bread product and maximum hourly heat input of 4.7 mmBtu(replaces PTI 06-06403 issued 8/28/01).

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., c)(2), d)(2), and e)(3).

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	Nitrogen oxide (NO _x) emissions shall not exceed 0.46 pound per hour. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-07(A) and 3745-17-10(B)(1). See b)(2)a. below
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
c.	ORC 3704.03(T)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V applicability)	VOC emissions shall not exceed 93.5 TPY based on a rolling, 12-month summation.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>NO_x emissions shall not exceed 2.02 TPY based on a rolling, 12-month summation.</p> <p>PE shall not exceed 0.41 TPY based on a rolling, 12-month summation.</p> <p>See b)(2)c. and c)(1).</p>
e.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-10(B)(1)	PE from the oven shall not exceed 0.020 pound per million Btu of actual heat input.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 regulation for NAAQS pollutant emissions 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 revision 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 OAC rule 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x and PE emissions from this air contaminant source since the uncontrolled potential to emit for NO_x and PE is less than 10 tons/yr.

- c. 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 production rate, upon issuance of this permit. The maximum annual production rate for this emissions unit shall not exceed 31,375 tons of baked product, based upon a rolling, 12-month summation of the production rates.



- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas as fuel in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (2) 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 2,000 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.
 - (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:



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

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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (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 permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) 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 5.96 pounds of VOC per ton of baked product Applicable Emission Limitation;
 - ii. all exceedances of the rolling, 12-month VOC, NO_x or PE Applicable Emission Limitations; and
 - iii. 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. Emissions Limitation:

VOC emissions shall not exceed 93.5 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)(2).

The applicable emission limitation was established based on information provided by the permittee in application A0047505 for FEPTIO P0113990 using the VOC EF as calculated for the white buns baked product:

$5.96 \text{ pounds of VOC/ton of baked product} \times 31,375 \text{ tons of baked product} \times 1 \text{ Ton}/2,000 \text{ pounds} = 93.5 \text{ TPY of VOC.}$

- b. Emissions Limitations:

NO_x emissions shall not exceed 0.46 pound per hour.

NO_x emissions shall not exceed 2.02 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

The hourly NO_x emission limitation was established by taking emission factor of 100 pounds of NO_x per million cubic feet of natural gas used from AP-42 Table



1.4-1 (7/98), and dividing by the assumed heat content of natural gas (1,020 Btu/cubic foot), multiplied by the actual heat input of 4.7 mmBtu per hour.

$$100 \text{ lb/mcf} / 1.020 \text{ Btu/scf} = 1.10 \text{ lbs/mmBtu} * 4.7 \text{ mmBtu} = 0.46 \text{ lbs/hr}$$

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual rolling, 12-month NO_x emission limitation shall be demonstrated by the recordkeeping requirements in d)(2)(c) and the following equation:

$$\text{Actual tons of baked product per rolling, 12-month} / 8,760 \text{ hrs/yr} = \text{tons/hr baked product}$$

$$0.46 \text{ lb/hrNO}_x / \text{tons/hr baked product} = \text{lbNO}_x/\text{ton of product} * 31,375 \text{ tons/yr restriction} / 2,000 \text{ tons/lb} = \text{TPY rolling, 12-month NO}_x\text{emissions}$$

c. Emissions Limitation:

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

Applicable Compliance Method

If required, visible particulate emissions shall be determined according to USEPA Method 9.

d. Emissions Limitations:

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

PE shall not exceed 0.41 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

The lb/mmBtu emission limitation is based on an emission factor of 1.9 pounds of PE per million cubic feet of natural gas used from AP-42 Table 1.4-2 (7/98), and dividing by the assumed heat content of natural gas (1,020 Btu/cubic foot).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



Draft Permit-to-Install and Operate

New Bakery of Ohio Inc

Permit Number: P0115010

Facility ID: 0660010244

Effective Date: To be entered upon final issuance

Compliance with the annual rolling, 12-month PE emission limitation shall be demonstrated by the recordkeeping requirements in d)(2)(c) and the following equation:

Actual tons of baked product per rolling, 12-month / 8,760 hrs/yr = tons/hr baked product

$0.094 \text{ lb/hr PE} / \text{tons/hr baked product} = \text{lb PE/ton of product} * 31,375 \text{ tons/yr restriction} / 2,000 \text{ tons/lb} = \text{TPY rolling, 12-month PE emissions}$

g) Miscellaneous Requirements

(1) None.