



State of Ohio Environmental Protection Agency

Street Address:

1800 WaterMark Drive  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

P.O. Box 1049  
Columbus, OH 43216-1049

08/06/98

**CERTIFIED MAIL**

01-25-04-0468

**RE: Final Chapter 3745-35 Permit To Operate**

Interstate Brands Corporation  
Jim Bennett  
697 North Fourth Street  
Columbus, OH 43215

Dear Jim Bennett:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Central District Office  
Jim Orlemann, DAPC Engineering  
Becky Castle, DAPC PMU



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 08/06/98

Facility ID: 01-25-04-0468

Expiration Date: 08/06/03

FINAL ISSUE

This document constitutes issuance for:

Interstate Brands Corporation  
679 North Fourth Street  
Columbus, OH 43215

of a permit to operate for:

P001 (Bread Oven #1)  
Bread - Oven #1

### PART I General Terms & Conditions

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

#### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

#### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These

quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

**5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

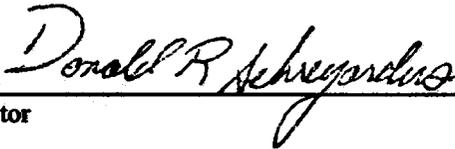
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Central District Office.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

  
\_\_\_\_\_  
Director

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural gas fired bread oven #1 (P001)	OAC Rule 3745-35-07	VOC emissions shall not exceed 90 tons per year from emissions units P001 and P002 based upon a rolling, 13 4-week period.
	OAC Rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per MMBtu of actual heat input.
	OAC Rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

None

**B. Operational Restrictions**

None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain the following records per 4-week period, for P001 and P002:
  - a. the type and amount of each baked good produced, in tons per 4-week period;
  - b. the name and calculated emission factor (VOC ef) for each baked good produced during the 4-week period; and
  - c. the calculated total VOC emissions for P001 and P002 per rolling, 13 4-week period.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which identify any exceedance of the rolling, 13 4-week period emission limitation for P001 and P002, as well as corrective actions that were taken to achieve compliance. The annual report also shall include calculations of the estimated total VOC emissions for the calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

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## E. Testing Requirements (continued)

- 1.a** Emission Limitation  
VOC emissions shall not exceed 90 tons per year from emissions units P001 and P002 based upon a rolling, 13 4-week period.

**Applicable Compliance Method**

The 90 tons VOC per year was calculated using the emission factor of 3.25 lb VOC per ton of baked goods and 55,380 tons of baked goods.

Compliance shall be based on the record keeping specified in Section C.1. The VOC emission factor (in lbs/ton of baked good) for each baked good will be multiplied by each baked good's production to obtain the VOC emission rate for each baked good, in pounds. The VOC emission rates for all baked goods will be totalled to obtain the total VOC emission rate for the rolling, 13 4-week period, and then divided by 2,000 lbs/ton. The emission factor will be calculated for each baked good as described in E.1.b.

- 1.b** To calculate emissions for the purpose of determining compliance, as described in E.1.a above, the emission factor (in lbs VOC/ton of baked goods) shall be calculated using the following equation:

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

VOC ef = emission factor in pounds of uncontrolled VOC emissions per ton of bread or other yeast leavened product produced.

$Y_i$  = initial baker's percent of yeast to the nearest tenth of a percent,

$t_i$  = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour,

$S$  = final (spiking) baker's percent of yeast to the nearest tenth of a percent, and

$t_s$  = spiking yeast action time, in hours, to the nearest tenth of an hour.

The value for VOC ef shall be calculated for each baked good produced in P001 and P002.

The above equation was taken from the USEPA publication "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017) dated December 1992.

- 1.c** Emission Limitation -  
Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

**Applicable Compliance Method -**

Compliance shall be demonstrated by the method specified in OAC rule 3745-17-03(B)(1).

- 1.d** Emission Limitation -  
0.020 pound of particulate emissions per MMBtu of actual heat input.

**Applicable Compliance Method -**

Compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (4,407 cu.ft/hr) by the AP-42 (Fifth Edition) emission factor for natural gas combustion (6.2 lbs/MMcu.ft), and dividing by the maximum hourly heat input capacity of the emissions unit (4.5 MMBtu/hr). If required, the permittee shall demonstrate compliance with this limitation in accordance with the method(s) and procedures specified in OAC rule 3745-17-03(B)(9).

## F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, sections A,B,C,D,E and F of these terms and conditions constitute the federally enforceable portions of this permit.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 8/6/98

Facility ID: 01-25-04-0468

Expiration Date: 08/06/03

FINAL ISSUE

This document constitutes issuance for:

Interstate Brands Corporation  
679 North Fourth Street  
Columbus, OH 43215

of a permit to operate for:

P002 (Roll Oven #2)  
Roll - Oven #2

### PART I General Terms & Conditions

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

#### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

#### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

#### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

#### **6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

#### **7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

#### **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Central District Office.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural gas fired bun/roll oven (P002)	OAC Rule 3745-35-07	VOC emissions shall not exceed 90 tons per year from emissions units P001 and P002 based upon a rolling, 13 4-week period.
	OAC Rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per MMBtu of actual heat input.
	OAC Rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

None

**B. Operational Restrictions**

None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain the following records per 4-week period, for P001 and P002:
  - a. the type and amount of each baked good produced, in tons per 4-week period;
  - b. the name and calculated emission factor (VOC ef) for each baked good produced during the 4-week period; and
  - c. the calculated total VOC emissions for P001 and P002 per rolling, 13 4-week period.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which identify any exceedance of the rolling, 13 4-week period emission limitation for P001 and P002, as well as corrective actions that were taken to achieve compliance. The annual report also shall include calculations of the estimated total VOC emissions for the calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

**E. Testing Requirements (continued)**

- 1.a** Emission Limitation  
VOC emissions shall not exceed 90 tons per year from emissions units P001 and P002 based upon a rolling, 13 4-week period.

**Applicable Compliance Method**

The 90 tons VOC per year was calculated using the emission factor of 3.25 lb VOC per ton of baked goods and 55,380 tons of baked goods.

Compliance shall be based on the record keeping specified in Section C.1. The VOC emission factor (in lbs/ton of baked good) for each baked good will be multiplied by each baked good's production to obtain the VOC emission rate for each baked good, in pounds. The VOC emission rates for all baked goods will be totalled to obtain the total VOC emission rate for the rolling, 13 4-week period, and then divided by 2,000 lbs/ton. The emission factor will be calculated for each baked good as described in E.1.b.

- 1.b** To calculate emissions for the purpose of determining compliance, as described in E.1.a above, the emission factor (in lbs VOC/ton of baked goods) shall be calculated using the following equation:

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

VOC ef = emission factor in pounds of uncontrolled VOC emissions per ton of bread or other yeast leavened product produced.

$Y_i$  = initial baker's percent of yeast to the nearest tenth of a percent,

$t_i$  = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour,

$S$  = final (spiking) baker's percent of yeast to the nearest tenth of a percent, and

$t_s$  = spiking yeast action time, in hours, to the nearest tenth of an hour.

The value for VOC ef shall be calculated for each baked good produced in P001 and P002.

The above equation was taken from the USEPA publication "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017) dated December 1992.

- 1.c** Emission Limitation -  
Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

**Applicable Compliance Method -**

Compliance shall be demonstrated by the method specified in OAC rule 3745-17-03(B)(1).

- 1.d** Emission Limitation -  
0.020 pound of particulate emissions per MMBtu of actual heat input.

**Applicable Compliance Method -**

Compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (4,407 cu.ft/hr) by the AP-42 (Fifth Edition) emission factor for natural gas combustion (6.2 lbs/MMcu.ft), and dividing by the maximum hourly heat input capacity of the emissions unit (4.5 MMBtu/hr). If required, the permittee shall demonstrate compliance with this limitation in accordance with the method(s) and procedures specified in OAC rule 3745-17-03(B)(9).

**F. Miscellaneous Requirements**

1. In accordance with OAC rule 3745-35-07, sections A,B,C,D,E and F of these terms and conditions constitute the federally enforceable portions of this permit.