



1/14/2014

Certified Mail

BRIDGET ANDREWS
The Kroger Co. Columbus Bakery
457 CLEVELAND AVE
Columbus, OH 43215

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125040519
Permit Number: P0115866
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

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

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
The Kroger Co. Columbus Bakery**

Facility ID:	0125040519
Permit Number:	P0115866
Permit Type:	Renewal
Issued:	1/14/2014
Effective:	1/14/2014
Expiration:	1/14/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
The Kroger Co. Columbus Bakery

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Final Permit-to-Install and Operate
The Kroger Co. Columbus Bakery
Permit Number: P0115866
Facility ID: 0125040519
Effective Date: 1/14/2014

Authorization

Facility ID: 0125040519
Application Number(s): A0049319
Permit Number: P0115866
Permit Description: FEPTIO Renewal for P001, P003, P006, and P008: bake good lines
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/14/2014
Effective Date: 1/14/2014
Expiration Date: 1/14/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

The Kroger Co. Columbus Bakery
457 CLEVELAND AVE
COLUMBUS, OH 43215

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

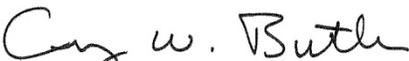
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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


Craig W. Butler
Interim Director



Authorization (continued)

Permit Number: P0115866
 Permit Description: FEPTIO Renewal for P001, P003, P006, and P008: bake good lines

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

Group Name: Baking Lines

Emissions Unit ID:	P001
Company Equipment ID:	Bread - Line 1
Superseded Permit Number:	01-12073
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Bun - Line 3
Superseded Permit Number:	01-12073
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Cracker - Line 1/Band 1
Superseded Permit Number:	01-12073
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Cracker - Line 2/Band 2
Superseded Permit Number:	01-12073
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
The Kroger Co. Columbus Bakery
Permit Number: P0115866
Facility ID: 0125040519
Effective Date: 1/14/2014

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 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 emission 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.

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.



Final Permit-to-Install and Operate
The Kroger Co. Columbus Bakery
Permit Number: P0115866
Facility ID: 0125040519
Effective Date: 1/14/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

The Kroger Co. Columbus Bakery

Permit Number: P0115866

Facility ID: 0125040519

Effective Date: 1/14/2014

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.



Final Permit-to-Install and Operate
The Kroger Co. Columbus Bakery
Permit Number: P0115866
Facility ID: 0125040519
Effective Date: 1/14/2014

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Baking Lines: P001,P003,P006,P008,

EU ID	Operations, Property and/or Equipment Description
P001	Bread - Line 1
P003	Bun - Line 3
P006	Cracker - Line 1/Band 1
P008	Cracker - Line 2/Band 2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Federally enforceable restrictions to avoid Title V)	<u>P001, P003, P006, P008:</u> Emissions shall not exceed: 88.5 tons OC per rolling 13, 4 week periods. See b)(2)b.
b.	ORC 3704.03(T)	Emissions shall not exceed: <u>P001:</u> 9.3lbs OC/hr <u>P003:</u> 4.1 lbs OC/hr <u>P006:</u>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		5.3 lbs OC/hr <u>P008:</u> 13.0 lbsOC/hr See b)(2)a.
c.	OAC 3745-31-05(A)(3), as effective 11/30/01	Emissions shall not exceed: <u>P001:</u> 0.79 lbNO _x /hr and 3.5 TPY 0.67 lb CO/hr and 2.9 TPY <u>P003:</u> 0.44 lbNO _x /hr and 1.9 TPY <u>P006:</u> 0.61 lbNO _x /hr and 2.7 TPY 0.51 lb CO/hr and 2.2 TPY <u>P008:</u> 1.39 lbsNO _x /hr and 6.1 TPY 1.17 lbs CO/hr and 5.1 TPY See b)(2)d.
d.	OAC 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.
e.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 pounds per million btu (MMBtu) of actual heat input.
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stacks serving these emissions units shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

(2) Additional Terms and Conditions

- a. The hourly OC limitation for this emissions unit was established to reflect the maximum potential to emit. Therefore, it is not necessary to develop additional



monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

- b. The maximum annual combined production rate for emissions units P001, P003, P006, and P008, shall not exceed 40,000 tons of bread and/or buns, and 24,000 tons of crackers based upon a rolling, 13, 4-week summation of the production rates.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- d. 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 particulate emissions (PE), carbon monoxide (CO), sulfur dioxide (SO₂), and nitrogen oxides (NO_x) from this contaminant source since the uncontrolled potentials to emit are less than ten tons per year.

c) Operational Restrictions

- a. The permittee shall burn only natural gas in emissions units P001, P003, P006, and P008.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain 4-week period records of the following information for emissions units P001, P003, P006, and P008:
 - a. the production rate of each type of baked goods, for each month, in tons;
 - b. the OC emission rate for each month (see f)(1)a for calculation);
 - c. the rolling, 13, 4-week summation of the production rates of baked goods, in tons; and
 - d. the rolling, 13, 4-week summation of the OC emission rates.
- (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 the emission 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. all exceedances of the rolling, 13, 4-week limitation of the production rate;
 - ii. all exceedances of the rolling, 13, 4-week emission limitation for OC;
- 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.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

OC emissions from emissions units P001, P003, P006, and P008 shall not exceed 88.5 tons per rolling, 13, 4-week periods.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the rolling 13, 4-week summation of the production rates by the OC emission factors of 1.54 pounds of OC per ton of bread produced, 1.54 pounds of OC per ton of buns produced, and 4.10 pounds of OC per ton of crackers produced ((f)(1)a.i. below) and dividing by 2,000 pounds per ton.

i. The OC emission factor was calculated for each baked good using the following equation:

$$\text{OC ef} = 0.95Y_i + 0.185t_i - 0.51S - 0.86t_s + 1.90, \text{ where}$$



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

Yi = initial baker's percent of yeast to the nearest tenth of a percent (0.90 percent for bread and buns and 0.95 percent for crackers);

ti = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (3.0 hrs for bread and buns and 6.5 hours for crackers);

S = final (spiking) bakers percent of yeast to the nearest tenth of a percent (1.0percent for bun and bread and 0 percent for crackers); and

ts = spiking yeast action time, in hours, to the nearest tenth of an hour (1.5 hrs for bread and buns and 0 hours for crackers).

The above equation was taken from the USEPA publication "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992) as published in AP 42, Fifth Edition, Volume I.

b. Emission Limitation:

OC from the stacks serving these emissions units, as regulated by ORC 3704.03(T), shall not exceed:

i. Emission Unit P001:

9.3 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by summing the OC emissions from baking and natural gas combustion.

The hourly OC emissions for natural gas combustion was calculated using the following equation:

$$OC_{ov} = Q_{ov} \times OC_{ng}, \text{ where}$$

$$Q_{ov} = \text{Maximum firing rate of oven, (7,941 ft}^3\text{/hour)}$$

$$OC_{ng} = 5.5 \text{ lbs/1,000,000 ft}^3 \text{ Natural Gas (AP 42, Fifth Edition, Volume I)}$$

The hourly OC emissions for baking was calculated using the following equation:

$$OC_{ov} = Q_{bg} \times OC_{ef}, \text{ where}$$

$$Q_{bg} = \text{Maximum baked goods production rate (6 tons per hour)}$$



$OC_{ef} = 1.54$ lbs OC/ton of baked goods produced (applicable to the bread line(see E.2)) where;

$Y_i =$ initial baker's percent of yeast to the nearest tenth of a percent (0.90 percent);

$t_i =$ total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (3.0 hours);

$S =$ final (spiking) bakers percent of yeast to the nearest tenth of a percent (1 percent); and

$t_s =$ spiking yeast action time, in hours, to the nearest tenth of an hour (1.5 hours).

ii. Emission Unit P003:

4.1 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by summing the OC emissions from baking and natural gas combustion.

The hourly OC emissions for natural gas combustion was calculated using the following equation:

$OC_{ov} = Q_{ov} \times OC_{ng}$, where

$Q_{ov} =$ Maximum firing rate of oven, (4,412 ft³/hour)

$OC_{ng} = 5.5$ lbs/1,000,000 ft³ Natural Gas (AP 42, Fifth Edition, Volume I)

The hourly OC emissions for baking was calculated using the following equation:

$OC_{ov} = Q_{bg} \times OC_{ef}$, where

$Q_{bg} =$ Maximum baked goods production rate (2.62 tons per hour)

$OC_{ef} = 1.54$ lbs OC/ton of baked goods produced (applicable to the bun line (see E.2) where;

$Y_i =$ initial baker's percent of yeast to the nearest tenth of a percent (0.90 percent);

$t_i =$ total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (3.0 hours);

$S =$ final (spiking) bakers percent of yeast to the nearest tenth of a percent (1.0 percent); and



t_s = spiking yeast action time, in hours, to the nearest tenth of an hour (1.50 hours).

iii. Emission Unit P006:

5.3 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by summing the OC emissions from baking and natural gas combustion.

The hourly OC emissions for natural gas combustion was calculated using the following equation:

$$OC_{ov} = Q_{ov} \times OC_{ng}, \text{ where}$$

$$Q_{ov} = \text{Maximum firing rate of oven, (6,078 ft}^3/\text{hour)}$$

$$OC_{ng} = 5.5 \text{ lbs/1,000,000 ft}^3 \text{ Natural Gas (AP 42, Fifth Edition, Volume I)}$$

The hourly OC emissions for baking was calculated using the following equation:

$$OC_{ov} = Q_{bg} \times OC_{ef}, \text{ where}$$

$$Q_{bg} = \text{Maximum baked goods production rate (1.3 tons per hour)}$$

$$OC_{ef} = 4.1 \text{ lbs OC/ton of baked goods produced (applicable to the cracker line(see E.2) where;$$

Y_i = initial baker's percent of yeast to the nearest tenth of a percent (0.95 percent);

t_i = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (6.5 hours);

S = final (spiking) bakers percent of yeast to the nearest tenth of a percent (0 percent); and

t_s = spiking yeast action time, in hours, to the nearest tenth of an hour (0 hours).

iv. Emission Unit P008:

13 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by summing the OC emissions from baking and natural gas combustion.



The hourly OC emissions for natural gas combustion was calculated using the following equation:

$$OC_{ov} = Q_{ov} \times OC_{ng}, \text{ where}$$

$$Q_{ov} = \text{Maximum firing rate of oven, (13,941 ft}^3/\text{hour)}$$

$$OC_{ng} = 5.5 \text{ lbs/1,000,000 ft}^3 \text{ Natural Gas (AP 42, Fifth Edition, Volume I)}$$

The hourly OC emissions for baking was calculated using the following equation:

$$OC_{ov} = Q_{bg} \times OC_{ef}, \text{ where}$$

$$Q_{bg} = \text{Maximum baked goods production rate (3.1 tons per hour)}$$

$$OC_{ef} = 4.1 \text{ lbs OC/ton of baked goods produced (applicable to the bread line(see E.2) where;}$$

Y_i = initial baker's percent of yeast to the nearest tenth of a percent (0.95 percent);

t_i = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (6.5 hours);

S = final (spiking) bakers percent of yeast to the nearest tenth of a percent (0 percent); and

t_s = spiking yeast action time, in hours, to the nearest tenth of an hour (0 hours).

c. Emission Limitation:

NO_x from the stack serving this emission unit, as regulated by OAC rule 3745-31-05(A)(3), effective 11/30/2001, shall not exceed:

i. Emission Unit P001:

0.79 lbNO_x/hr and 3.5 TPY NO_x

Applicable Compliance Method:

Compliance with the hourly NO_xemission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.00794MMcf/hr), the AP-42 [Table 1.4-1] emission factor for natural gas (100 lbs of nitrogen oxides/MMcf). For the annual NO_x compliance, multiply the hourly emission limitation by 8,760 hours and divide by 2,000 to convert from pound(s) to ton(s).



ii. Emission Unit P003:

0.44 lbNO_x/hr and 1.9 TPY NO_x

Applicable Compliance Method:

Compliance with the hourly NO_x emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.00441MMcf/hr), the AP-42 [Table 1.4-1] emission factor for natural gas (100 lbs of nitrogen oxides/MMcf). For the annual NO_x compliance, multiply the hourly emission limitation by 8,760 hours and divide by 2,000 to convert from pound(s) to ton(s).

iii. Emission Unit P006:

0.61 lbNO_x/hr and 2.7 TPY NO_x

Applicable Compliance Method:

Compliance with the hourly NO_x emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.00608MMcf/hr), the AP-42 [Table 1.4-1] emission factor for natural gas (100 lbs of nitrogen oxides/MMcf). For the annual NO_x compliance, multiply the hourly emission limitation by 8,760 hours and divide by 2,000 to convert from pound(s) to ton(s).

iv. Emission Unit P008:

1.39 lbsNO_x/hr and 6.1 TPY NO_x

Applicable Compliance Method:

Compliance with the hourly NO_x emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.0139MMcf/hr), the AP-42 [Table 1.4-1] emission factor for natural gas (100 lbs of nitrogen oxides/MMcf). For the annual NO_x compliance, multiply the hourly emission limitation by 8,760 hours and divide by 2,000 to convert from pound(s) to ton(s).

d. Emission Limitation:

CO from the stack serving this emission unit, as regulated by OAC rule 3745-31-05(A)(3), effective 11/30/2001, shall not exceed:

i. Emission Unit P001:

0.67 lb CO/hr and 2.9 TPY CO



Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.00794 MMcf/hr), the AP-42 [Table 1.4-1] emission factor for natural gas (84 lbs of nitrogen oxides/MMcf). For the annual CO compliance, multiply the hourly emission limitation by 8,760 hours and divide by 2,000 to convert from pound(s) to ton(s).

ii. Emission Unit P006:

0.51 lb CO/hr and 2.2 TPY CO

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.00608 MMcf/hr), the AP-42 [Table 1.4-1] emission factor for natural gas (84 lbs of nitrogen oxides/MMcf). For the annual CO compliance, multiply the hourly emission limitation by 8,760 hours and divide by 2,000 to convert from pound(s) to ton(s).

iii. Emission Unit P008:

1.17 lbs CO/hr and 5.1 TPY CO

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.0139MMcf/hr), the AP-42 [Table 1.4-1] emission factor for natural gas (84 lbs of nitrogen oxides/MMcf). For the annual CO compliance, multiply the hourly emission limitation by 8,760 hours and divide by 2,000 to convert from pound(s) to ton(s).

e. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.020 pounds per mmBTU of actual heat input.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emission unit (P001-7,941 cubic feet per hour, P003-4,412 cubic feet per hour, P006-6,078 cubic feet per hour, P008-13,941 cubic feet per hour) by the AP-42 (Fifth Edition) emission factor for natural gas combustion (7.6 pounds per million cubic feet) and dividing by the maximum hourly heat input of the emissions unit (P001-8.1 mmBTU per hour, P003-4.5 mmBTU per hour, P006-6.2 mmBTU per hour, P008-14.2 mmBTU per hour).



Final Permit-to-Install and Operate

The Kroger Co. Columbus Bakery

Permit Number: P0115866

Facility ID: 0125040519

Effective Date: 1/14/2014

If required, the permittee shall demonstrate compliance with this limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

f. Emission Limitation:

Visible particulate emissions from any stacks serving these emissions units shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.