John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

5/30/2014

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

Mr. MICHAEL Elenz
SCHWEBEL BAKING CO #1
965 E Midlothian Blvd
Youngstown, OH 44502

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318538152
Permit Number: P0116378
Permit Type: Renewal
County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: CDAQ

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
SCHWEBEL BAKING CO #1

Facility ID:	1318538152
Permit Number:	P0116378
Permit Type:	Renewal
Issued:	5/30/2014
Effective:	5/30/2014
Expiration:	5/30/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
SCHWEBEL BAKING CO #1

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. P002, Solon Oven #55850 11

Authorization

Facility ID:	1318538152
Application Number(s):	A0050160
Permit Number:	P0116378
Permit Description:	FEPTIO renewal permit for emissions unit P002 - natural gas-fired Combination Baker Perkins Oven 55850
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	5/30/2014
Effective Date:	5/30/2014
Expiration Date:	5/30/2019

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SCHWEBEL BAKING CO #1
6250 CAMP INDUSTRIAL RD
Solon, OH 44139

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:

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

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
Director

Authorization (continued)

Permit Number: P0116378
Permit Description: FEPTIO renewal permit for emissions unit P002 - natural gas-fired Combination Baker Perkins Oven 55850

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

Emissions Unit ID:	**P002**
Company Equipment ID:	Solon Oven 55850
Superseded Permit Number:	P0103950
General Permit Category and Type:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P002, Solon Oven #55850

Operations, Property and/or Equipment Description:

Baker Perkins Combination Oven #55850 – natural gas fired 5.85 mmBtu/hr

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)h., c)(2), d)(2), e)(1), and f)(1)j.

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) FEPTIO P0103950 issued final 3/2/2009	Volatile Organic Compound (VOC) emissions shall not exceed 23.40 lbs/hour from bread baking. Organic Compound (OC) emissions shall not exceed 0.07 lb/hour and 0.31 tons/year (TPY) from the 5.85 mmBtu/hour natural gas-fired burner.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Nitrogen Oxide (NOx) emissions shall not exceed 0.58 lb/hour and 2.54 TPY from the 5.85 mmBtu/hour natural gas-fired burner. Carbon Monoxide (CO) emissions shall not exceed 0.48 lb/hour and 2.11 TPY from the 5.85 mmBtu/hour natural gas-fired burner. See b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	NOx emissions shall not exceed 10 TPY. CO emissions shall not exceed 10 TPY. See b)(2)b. below.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	0.020 lbs of particulate emissions per mmBtu of actual heat input.
f.	OAC rule 3745-18-06	Exempt. See c)(1) below.
g.	OAC rule 3745-21-12(C)(4)a.	Exempt. See b)(2)c. below.
h.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V	The combined annual VOC emissions from P002 and P003 shall not exceed 41.0 TPY as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

a. 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.

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 State Implementation Plan.

[The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated

annual emissions rate for particulate emissions is less than 10 tons/year taking into account the federally enforceable rule limit of 0.020 lbs of particulate emissions per mmBtu of actual heat input under SIP approved OAC rule 3745-17-10(B)(1).

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx and CO emissions from this air contaminant source since the calculated annual emissions rate for NOx and CO are each less than 10 tons/year.]

c. The requirements of this rule do not apply to this emissions unit because federally enforceable restrictions limit annual emissions below the applicability threshold.

c) Operational Restrictions

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

(2) The permittee shall determine the emission factor (EF) established by the following equation for VOC emissions for each different recipe used in bread and bun baking operations taken from AP-42, Volume 1, Fifth Edition (January, 1995), section 9.9.6 "Bread Baking":

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

Where
VOC EF = pounds of VOC per ton of baked bread
Y_i = initial baker's percentage of yeast
t_i = total yeast action time in hours
S = final (spike) baker's percentage of yeast
t_s = spiking time in hours

The total combined bread and buns produced in P002 and P003 shall be restricted on a rolling, 12-month summation using the following equation:

$$\sum_{i=1}^{n}[EF\ VOC_i\ x\ (tons\ product_i/month)]\ /\ (2{,}000\ pounds/ton)\ +\ X$$

41.0 tons VOC/rolling 12-month period

Where
i = each different recipe used in baking operations
X = total VOC emissions for the past 11 months

The total combined emissions of VOC from P002 and P003 shall not exceed 41.0 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain monthly records of the following information for P002 and P003 individually and combined:

a. the name and identification of each recipe produced;

b. the total amount of baked goods produced per recipe, in tons per month;

c. the emission factor for each recipe as calculated in Section c)(2);

d. the total monthly VOC emissions, in tons, for each recipe by summing [(b. x c.)/2,000] for all recipes produced in accordance with c)(2) above; and

e. the rolling 12-month summation of total VOC emission, in tons.

(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 emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

(4) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible

emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

(5) The permittee shall calculate the hourly VOC emissions (as calculated under f)(1)a. below) associated with the addition of any new recipe prior to processing by this emissions unit to determine compliance with the allowable hourly VOC emission limitation identified in b)(1)a. above.

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. allexceedances of the rolling, 12-month emission limitation for cumulative VOC emissions levels shown in c)(2).

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 each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be 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.

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(4) The permittee shall notify the Cleveland DAQ within fifteen (15) days prior to the usage of any new recipe where an exceedance of the allowable hourly VOC emission limitation may occur.

f) Testing Requirements

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

a. Emission Limitation:
23.40 lbs/hr of VOC

Applicable Compliance Method:
Compliance with the pound per hour limitation shall be determined by multiplying the emission factor established by the equation for VOC emissions from bread baking operations was taken from AP-42, Volume 1, Fifth Edition (January, 1995), section 9.9.6, "Bread Baking" by the amount of bread produced, in tons. This is shown below in a one-time calculation of Potential-to-Emit for the worst case recipe in 2013 at the maximum production rate:

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

Where
VOC EF = pounds of VOC per ton of baked bread
Y_i = initial baker's percentage of yeast
t_i = total yeast action time in hours
S = final (spike) baker's percentage of yeast
t_s = spiking time in hours

The following example equation is based on the highest VOC emitting recipe processed during CY 2013:

$$\text{VOC EF} = 0.95(6.0\%) + 0.195(1.0) - 0.51(0\%) - 0.86(0) + 1.90$$
$$= 7.80 \text{ pounds VOC/ton baked bread}$$

(7.80 pounds VOC/ton baked bread) x (3 tons baked bread/hour) = 23.40 pounds VOC/hour

b. Emission Limitation:
0.07 lb/hour of OC emissions from the 5.85 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by the mmBtu/hour rating of the natural gas-fired burner. Since the emissions factor is given in a volume format, it was converted to an energy basis by dividing the given factor by 1,020 mmBtu/10^6scf.

c. Emission Limitation:
0.31 tons/year of OC from the 5.85 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

d. Emission Limitation:
0.58 lbs/hour of NOx emissions from the 5.85 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:
Compliance with the pound per hour limitation shall be determined by multiplying the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by the mmBtu/hour rating of the natural gas-fired burner. Since the emissions factor is given in a volume format, it was converted to an energy basis by dividing the given factor by 1,020 mmBtu/106 scf

e. Emission Limitation:
2.54 tons/year of NOx emissions from the 5.85 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

f. Emission Limitation:
0.48 lbs/hour of CO emissions from the 5.85 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:
Compliance with the pound per hour limitation shall be determined by multiplying the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by the mmBtu/hour rating of the natural gas-fired burner. Since the emissions factor is given in a volume format, it was converted to an energy basis by dividing the given factor by 1,020 mmBtu/106 scf.

g. Emission Limitation:
2.11 tons/year of CO emissions from the 5.85 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

h. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

i. Emission Limitation:
0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the pound per mmBtu emissions limit shall be shown by dividing the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by 1,020 mmBtu/10^6scf.

j. Emission Limitation:
The combined annual VOC emissions for P002 and P003 shall not exceed 41.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping from d)(2) and the following:

$\sum_{i=1}^{n}[EF\ VOC_i\ x\ (tons\ product_i/month)]\ /\ (2{,}000\ pounds/ton)$ = tons VOC/month

Where

i = each different recipe used in baking operations

The permittee shall then sum the total monthly VOC emissions as a rolling, 12-month summation.

g) Miscellaneous Requirements

(1) This emissions unit was installed in March of 2009.