Ohio Environmental Protection Agency

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

6/26/2015

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: New Horizons Baking Company
Facility ID: 0339020158
Permit Type: Minor Permit Modification
Permit Number: P0118399

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
New Horizons Baking Company

Facility ID:	0339020158
Permit Number:	P0118399
Permit Type:	Minor Permit Modification
Issued:	6/26/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
New Horizons Baking Company

Table of Contents

Authorization 1

A. Standard Terms and Conditions 2

1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 13
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 16
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 19
1. Operations, Property and/or Equipment Description: 20
2. P003, P003 27
3. P004, P004 31
4. P008, P008 35

Authorization

Facility ID:	0339020158
Facility Description:	Baking of Bread, Cake, and Related Products.
Application Number(s):	A0052711
Permit Number:	P0118399
Permit Description:	Title V minor permit modification to add PTI P0118398 for a new bakery oven (P008).
Permit Type:	Minor Permit Modification
Issue Date:	6/26/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0108776

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

New Horizons Baking Company
P.O Box 348
Norwalk, OH 44857

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five 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 this permit. Such records may be maintained in computerized form.

26. 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 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.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office 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 the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable:

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install; or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

   a) B001 – 2.34 mmBtu/hr natural gas-fired boiler (bun);

   b) B002 – 1,050 Btu/hr natural gas-fired boiler (muffin);

   c) B003 – 0.84 mmBtu/hr natural gas-fired boiler;

   d) L001 – Solvent cold cleaner (maintenance) (Safety Kleen); and

   e) P005 – 2.0 mmBtu/hr natural gas-fired basket dryer.

   [OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. Operations, Property and/or Equipment Description:

Bun Line with Oven B

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)f., d)(2), d)(3), d)(4) and e)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) [P0105642, modification issued 3/22/2010]	<u>Emissions from Bread Baking:</u> 81.5tonsvolatile organic compounds (VOC) per rolling 12 month period See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 [P0105642, modification issued 3/22/2010]	<u>Emissions From Natural Gas Combustion:</u> 0.83 lb of nitrogen oxides (NOx)/hour, 3.6 tons of NOx per year 0.69 lb of carbon monoxide (CO)/hour, 3.0 tons of CO per year See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [P0105642, modification issued 3/22/2010]	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-17-11(B)	See b)(2)e.
f.	OAC rule 3745-114 ORC 3704.03(F)	See d)(2), d)(3), d)(4) and e)(3)

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirement under ORC 3704.03(T) that is associated with this emissions unit for VOC has been determined to be the VOC

limitation established above and represents the Potential to Emit (PTE) for this emission unit.

The PTE of 81.5 tons of VOC/yrwas calculated using the worst-case emission factor of 3.72lbs VOC/ton product multiplied by the maximum hourly production rate of 5.0 tons/hr and 8760 hours of operation.The worst-case emission factor was based on the yeast contents supplied by the permittee and calculated using the equation in the Alternative Control Technology Document for Bakery Oven Emissions, EPA-453/R-92-017, December 1992.

b. The permittee satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit that are associated with the combustion of natural gas in the oven. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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.

c. The requirements of OAC rule 3745-31-05(A)(3)(a)(ii) apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. Therefore, the BAT requirements under OAC rule 3745-31-05 (A)(3)(a) would not apply to the NOx and CO emissions since the uncontrolled potentials to emit (PTE) for these pollutants would each be less than ten tons per year.

The PTE from the combustion emissions is 3.6 tons of NOx and 3.0 tons of CO respectively. Potential emissions were determined by multiplying the oven's maximum heat input of 8.26mmBtu/hr, the AP-42 emission factors (Table 1.4-1) of 100.0lbof NOx per million scfand 80.0lb of CO per million scf, a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton and 1000 Btu/scf.

It should be noted that this air contaminant source has emissions of VOC, sulfur dioxide (SO2) and particulate matter 10 microns or less in size (PM10) which are associated with the combustion of natural gas in the oven. The potential emissions of VOC, SO2 and PM10, when based on the maximum heat input of 8.26 mmBtu/hr, result in negligible emission quantities and therefore have not been addressed within this permit.

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

e. The uncontrolled mass rate of PE* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P-3 county.

*The burning of natural gas is the only source of PE from this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the emission factor* for each type of bread/bunprocessed in this emissions unit, in units of VOC/ton of bread/bun processed,

b. the quantity of each type of bread/bun processed, in tons

c. the VOC emissions of each type of bread/bun processed [d)(1)a. x d)(1)b. for each product], in tons

d. the VOC emissions from all the breads/buns processed [summation of d)(1)c.], in tons, and

e. the annual VOC emissions**, based on a rolling, 12-month summation.

*The emission factor for each type of bread/bun processed shall be determined by using the equations in the Alternative Control Technology Document for Bakery Oven Emissions, EPA-453/R-92-017, December 1992.

**This is an existing emissions unit and as such has actual emissions data from the previous 12 month period.

[OAC rule 3745-77-07(C)(1) and P0105642]

(2) The permit-to-install (PTI)application for this emissions unit, P001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to thisemissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

where; X = 24 and Y = 7

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year):

Toxic Contaminant: Acetaldehyde

TLV: 25 ppm, 45,059 ug/m3

Maximum Hourly Emission Rate (lbs/hr): 0.56 lb/hour

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 394.7ug/m3

MAGLC (ug/m3): 1072 ug/m3

[P0105642]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can

affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[P0105642]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination

that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[P0105642]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any exceedances of the VOC emission limitation of 81.5 tons per rolling, 12-month period.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[P0105642]

f) Testing Requirements

(1) Compliance with the emissions limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u> 81.5tonsVOC per rolling, 12-month period

<u>Applicable Compliance Method:</u> Compliance with the VOC emission limitation shall be based on the record keeping specified in section d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and P0105642]

b. <u>Emission Limitations:</u>0.83 lb of NOx/hour, 3.6 tons of NO_X per year and 0.69 lb of CO/hour, 3.0 tons of CO per year

<u>Applicable Compliance Method:</u>The hourly emission limitations represent the potentials to emit* for this emissions unit. Therefore, no monitoring record

keeping, or deviation reporting is required to demonstrate compliance with these limitations.

*Potential emissions were determined by multiplying the oven's maximum heat input of 8.26mmBtu/hour,the AP-42 emission factors (Table 1.4-1) of 100.0lbsof NOx per million scfand 80.0lbs of CO per million scf, a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton and 1000 Btu/scf.

If required, the permittee shall demonstrate compliance with the hourly emission limitations above in accordance with the following test methods:

for NOx, Methods 1 through 4 and 7of 40 CFR, Part 60, Appendix A; and

for CO, Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A;

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

The annual emission limitations were established by multiplying the hourly emission limitations by a maximum operating schedule of 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore; provided compliance with the hourly limitations is shown, compliance with the annual limitationsshallalso be demonstrated.

[OAC rule 3745-77-07(C)(1) and P0105642]

g) Miscellaneous Requirements

(1) None.

2. P003, P003

Operations, Property and/or Equipment Description:

3.71 natural gas-fired muffin griddle (baking oven.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) See b)(1)d., d)(3), d)(4), d)(5) and e)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [P0106133, modification issued 3/18/2010]	3.44 lbs volatile organic compounds (VOC)/hr and 15.07 tons VOC/yr
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	See b)(2)b.
d.	OAC rule 3745-114 ORC 3704.03(F)	See d)(3), d)(4), d)(5) and e)(3)

(2) Additional Terms and Conditions

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

b. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P-3 county.

c) Operational Restrictions

(1) The maximum, initial percentage of baker's yeast employed in this emissions unit shall not exceed 5.3%, by volume.

[OAC rule 3745-77-07(A)(1) and P0106133]

(2) The permittee shall not employ a spiking yeast in this emissions unit.

[OAC rule 3745-77-07(A)(1) and P0106133]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the initial percentage (by volume) of baker's yeast used in this emissions unit.

[OAC rule 3745-77-07(C)(1) and P0106133]

(2) For each day during which the permittee employs a spiking yeast, the permittee shall maintain a record of the percentage, by volume and the action time of the spiking yeast employed in this emissions unit.

[OAC rule 3745-77-07(C)(1) and P0106133]

(3) The permit to install for emission unit P003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's Review of New Sources of Air Toxic Emissions policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the worst case pollutant(s):

Pollutant: Ethanol

TLV (mg/m^3): 1,884

Maximum Hourly Emission Rate (lbs/hr): 3.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 310.5

MAGLC (ug/m^3): 44,857

[P0106133]

(4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the Air Toxic Policy will still be still satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the Air Toxic Policy include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission

of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a modification under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

[P0106133]

(5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the Air Toxic Policy:

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

[P0106133]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any exceedances of the maximum initial percentage (by volume) of baker's yeast employed in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[P0106133]

(4) The permittee shall submit deviation (excursion) reports that identify each day when a spiking yeast was employed in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

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 Limitations: 3.44 lbs VOC/hr and 15.07 tons VOC/yr

Applicable Compliance Method: The hourly emission limitation was established by multiplying the AIB emission factor from the Alternative Control Technology Document for Bakery Oven Emissions, EPA-453/R-92-017, December 1992 of2.29 lbs VOC/ton product by the maximum hourly production rate of 1.5 tons.Compliance with the hourly limitation was demonstrated through stack testing in February 2007. If required, the permittee shall demonstrate compliance further with the hourly emission limitation in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission factor by 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and P0106133]

g) Miscellaneous Requirements

(1) None.

3. P004, P004

Operations, Property and/or Equipment Description:

Muffin Line #2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g. and d)(1).

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.	ORC 3704.03(T) [P0106786, issued 10/8/2010]	Volatile organic compound (VOC) emissions shall not exceed 2.26 lb/ton of yeast leaven product produced. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 [P0106786, issued 10/8/2010]	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [P0106786, issued 10/8/2010]	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC rule 3745-18-06(E)	39.4lbs sulfur dioxide (SO_2)/hour See b)(2)f.
g.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(1).

(2) Additional Terms and Conditions

a. The BAT requirements of ORC 3704.03(T) have been determined to be the establishment of the emission limitation in section b)(1)a.

b. The “Best Available Technology” (BAT) requirement under OAC rule 3745-31-05(A)(3), effective 11/30/01, has resulted in no emission limitations being established for this emissions unit.

Emissions of nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO_2), and particulate matter equal to or less than ten microns in diameter (PM_{10}) are generated as the products of combustion from the use of natural gas in the muffin line. The potential emissions for the above mentioned products of combustion are based on a maximum heat input of 3.71 mmBtu/hr (natural gas) and result in negligible emission quantities and, therefore, have not been addressed through individual BAT limitations for natural gas combustion within this permit.

c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the NOx, CO, SO_2, and PM_{10} emissions associated with natural gas combustion from this emissions unit since the uncontrolled potential to emit for each pollutant is less than 10 tons per year.

Potential emissions for all products of combustion were determined by applying the appropriate natural gas emission factors from AP-42, Tables 1.4-1 and 1.4-2 (07/1998) to a maximum fuel heat input of 3.71 mmBtu/hr.

d. The uncontrolled mass rate of emissions (UMRE) of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also , Table I does not apply because the facility is located in Huron County.

e. This emissions unit is exempt from the visible emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

f. The potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design) for SO_2 from the muffin line is less than the allowable emission limitation established by OAC rule 3745-18-06(E)(2). See f)(1)a for details regarding the potential to emit for SO_2 emissions.

g. The 2.26 lb VOC/ton of yeast leaven product produced represents the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and

obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[P0106786]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

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: 39.4 lbs SO_2/hour

Applicable Compliance Method: The potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design) for SO_2 from this emissions unit is less than the allowable limitation established by OAC rule 3745-18-06(E)(2) and, therefore; compliance is assured. The potential to emit is based on an AP-42 emission factor of 0.0006 lb SO_2/mmBtu [Table 1.4-2 (7/98] and a maximum heat input of 3.71 mmBtu per hour. If required, an evaluation of the SO_2 potential to emit shall be determined based on the results of emission testing conducted in accordance with the test methods and procedures as outlined in OAC rule 3745-18-04(A).

[OAC rule 3745-77-07(C)(1) and P0106786]

b. Emission Limitation: VOCemissions shall not exceed 2.26 lb/ton of yeast leaven product produced

Applicable Compliance Method: This allowable emission limit represents the potential to emit for this emission unit and was established from the stack test (performed in February 2007) results on an identical emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to demonstrate compliance with this emission limit.

If required, the permittee shall demonstrate compliance with the allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and P0106786]

g) Miscellaneous Requirements

(1) None.

4. P008, P008

Operations, Property and/or Equipment Description:

Yeast Leaven Bakery Oven (1.5 tons/hour), Griddle #3,

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g. and d)(1).

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.	ORC 3704.03(T) [P0118398, issued 3/9/2015]	Volatile organic compound (VOC) emissions shall not exceed 2.26 lb/ton of yeast leaven product produced. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/08 [P0118398, issued 3/9/2015]	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08 [P0118398, issued 3/9/2015]	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC 3745-18-06(E)	39.4 lbs sulfur dioxide (SO_2)/hour See b)(2)f.
g.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(1)

(2) Additional Terms and Conditions

a. The BAT requirements of ORC 3704.03(T) have been determined to be the establishment of the emission limitation specified in section b)(1)a.

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for the nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO2), and particulate matter 10 microns or less in size (PM_{10}), emissions from this emissions unit has resulted in no emission limitations being established for this emissions unit under this rule.

Emissions of NO_x, CO, SO_2, and PM_{10} are generated as the products of combustion from the use of natural gas in the muffin line. The potential emissions for the above mentioned products of combustion are based on a maximum heat input of 3.71 mmBtu/hr (natural gas) and result in negligible emission quantities and, therefore, have not been addressed through individual BAT limitations for natural gas combustion within this permit.

These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, SO_2, PM_{10}, and CO emissions from this air contaminant source since the uncontrolled potential to emit for NO_x, SO_2, PM_{10}, and CO is each less than 10 tons/year.

These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii), the less than 10 tons per year BAT exemption, as part of the Ohio SIP.

d. The uncontrolled mass rate of emissions (UMRE) of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also , Table I does not apply because the facility is located in Huron County.

e. This emissions unit is exempt from the visible emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

f. The potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design) for SO_2 from the muffin line is less than the allowable emission limitation established by OAC rule 3745-18-06(E)(2). See f)(1)a for details regarding the potential to emit for SO_2 emissions.

g. The 2.26 lb VOC/ton of yeast leaven product produced represents the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

[P0118398]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
39.4 lbs SO_2/hour

<u>Applicable Compliance Method:</u>
The potential to emit (defined as the maximum capacity to emit an air pollutant under the physical and operational design) for SO_2 from this emissions unit is less than the allowable limitation established by OAC rule 3745-18-06(E)(2) and therefore compliance is assured. The potential to emit is based on an AP-42 emission factor of 0.0006 lb SO_2/mmBtu [Table 1.4-2 (7/98)] and a maximum heat input of 3.71 mmBtu per hour. If required, the SO_2 potential to emit shall be determined in accordance with the test methods and procedures of OAC rule 3745-18-04(A).

[OAC rule 3745-77-07(C)(1) and P0118398].

b. <u>Emission Limitation:</u>
VOC emissions shall not exceed 2.26 lb/ton of yeast leaven product produced.

<u>Applicable Compliance Method:</u>
This allowable emission limit represents the potential to emit for this emission unit and was established from the stack test results on an identical unit performed in February 2007. Therefore, no monitoring, recordkeeping or

reporting requirements are necessary to demonstrate compliance with this emission limit.

If required, the permittee shall demonstrate compliance with the allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and P0118398].

g) Miscellaneous Requirements

(1) None.