



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

11/4/2015

Certified Mail

CHRISTIAN GARDNER
Alfred Nickles Bakery Inc.
26 North Main Street
Navarre, OH 44662

Facility ID: 1576160364
Permit Number: P0108305
County: Stark

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Canton Repository. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Canton City Health Department at (330)489-3385.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Canton; Pennsylvania; West Virginia

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal

Alfred Nickles Bakery Inc.

26 North Main Street, , Navarre, OH 44662

ID#: P0108305

Date of Action: 11/4/2015

PermitDesc: Title V renewal permit for a commercial bakery with no controls..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the ID # or: David Hampton, Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544. Ph: (330)489-3385



Statement of Basis
 Alfred Nickles Bakery Inc.
Permit Number: P0108305
Facility ID: 1576160364

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1576160364
Facility Name:	Alfred Nickles Bakery Inc.
Facility Description:	Commercial Bakery
Facility Address:	26 North Main Street, Navarre, OH 44662
Permit #:	P0108305, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Statement of Basis
 Alfred Nickles Bakery Inc.
Permit Number: P0108305
Facility ID: 1576160364

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	An administrative modification PTI P0118331 was issued to address errors in the VOC emission factor calculations for P006 and P007. Additionally, superfluous production limits were removed for these units as they did not act to restrict the units or effectively avoid any regulatory thresholds.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1			Lists facility wide terms and conditions that are enforceable under state law only



C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements? R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement Misc = miscellaneous requirements													
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P002 P005 P006 P007 P008	None	17-07(A)	N	Y	N	N	N	N	N	N	N	N	ND- This emissions unit is exempt from the visible PE limitations pursuant to OAC rule 3745-17-07(A)(3)(h) because it is not subject to OAC rule 3745-17-11 requirements
P002 P005 P006 P007 P008	None	17-11(B)	N	Y	N	N	N	N	N	N	N	N	ND- 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight rate (excludes gaseous fuels) that causes any emissions of particulate matter is equal to zero.
P002 P005 P006 P007 P008	None	18-06(E) 18-82(A)	N N	Y Y	N N	ND- This emissions unit is designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). Pursuant to OAC rule 3745-18-06(C), this emissions unit is exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.							



Statement of Basis
 Alfred Nickles Bakery Inc.
Permit Number: P0108305
Facility ID: 1576160364

P002 P005 P006 P007 P008	None	17-10(C)	N	Y	N	N	N	N	N	N	N	N	ND- This emissions unit is designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). It is, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment.
P006	0.50 lb CO/hr 0.60 lb NOx/hr 20.0 lb OC/hr	31-05	N	N	N	N	N	N	N	N	N	N	M,R,Rp,ET- The emission limitations represent the PTE for this emissions unit so terms not necessary to ensure compliance.
P006	2.19 tpy CO 2.63 tpy NOx 62.4 tpy OC	31-05	N	N	N	N	N	N	N	N	N	N	M,R,Rp,ET- The emission limitations represent the PTE for this emissions unit so terms not necessary to ensure compliance.
P007	0.34 lb CO/hr 0.40 lb NOx/hr 11.5 lb OC/hr	N	31-05	N	N	N	N	N	N	N	N	N	M,R,Rp,ET- The emission limitations represent the PTE for this emissions unit so terms not necessary to ensure compliance.



Statement of Basis
Alfred Nickles Bakery Inc.
Permit Number: P0108305
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P007	1.5 tpy CO 1.8 tpy NOx 35.7 tpy OC	N	31-05	N	N	N	N	N	N	N	N	N	N	M,R,Rp,ET- The emission limitations represent the PTE for this emissions unit so terms not necessary to ensure compliance.
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DRAFT

**Division of Air Pollution Control
Title V Permit
for
Alfred Nickles Bakery Inc.**

Facility ID:	1576160364
Permit Number:	P0108305
Permit Type:	Renewal
Issued:	11/4/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Alfred Nickles Bakery Inc.

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Draft Title V Permit
Alfred Nickles Bakery Inc.
Permit Number: P0108305
Facility ID: 1576160364

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1576160364
Facility Description:
Application Number(s): A0042123
Permit Number: P0108305
Permit Description: Title V renewal permit for a commercial bakery with no controls.
Permit Type: Renewal
Issue Date: 11/4/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0101431

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

Alfred Nickles Bakery Inc.
26 North Main Street
Navarre, OH 44662

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

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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 Canton City Health Department. 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



Draft Title V Permit
Alfred Nickles Bakery Inc.
Permit Number: P0108305
Facility ID: 1576160364
Effective Date: To be entered upon final issuance

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 recordings for 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 submitted scheduled 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 Canton City Health Department. 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 Canton City Health Department 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 Canton City Health Department 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 permit except 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

Official that, 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 Canton City Health Department 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 Canton City Health Department) 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 intermittent consistent 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 Canton City Health Department 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 Canton City Health Department 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, no emissions unit identified in this permit that has been certified 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 Requirements Under 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 the Canton City Health Department.
- 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 Canton City Health Department. 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 Requirements Under 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 Canton City Health Department 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 Canton City Health Department 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.



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Permit Number: P0108305
Facility ID: 1576160364

Effective Date: To be entered upon final issuance

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 of an 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 Canton City Health Department, 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.



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B. Facility-Wide Terms and Conditions



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Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



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C. Emissions Unit Terms and Conditions



1. P006, NAV BREAD2 OVEN

Operations, Property and/or Equipment Description:

12,000 lb/hr spiral-type Bake Tech Bread Oven for the baking of yeast raised bread. Directly fired with natural gas with a maximum heat input rating of 6 mmBTU/hr.

- 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) None.
- 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) [Best Available Technology (BAT) from PTI P0118331 issued on 07/30/2015]	Carbon monoxide (CO) emissions shall not exceed 0.50 lb/hr and 2.2 tons/yr Nitrogen oxides (NOx) emissions shall not exceed 0.60 lb/hr and 2.6 tons/yr Volatile organic compounds (VOC) shall not exceed 20.0 lbs /hr and 62.4 tons/yr See b)(2)a.-c.
b.	OAC rule 3745-17-07(A)	Exempt. See b)(2)d.
c.	OAC rule 3745-17-11(B)	Exempt. See b)(2)e.
d.	OAC rule 3745-17-10(C)	Exempt. See b)(2)f
e.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)f. and b)(2)g.

- (2) Additional Terms and Conditions
 - a. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) have been determined to be compliance with the emission limitations included in term b)(1)a.
 - b. The emissions limitations for VOC, NOx and CO are based on the emission unit's potential to emit when firing natural gas. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.



- c. The uncontrolled potential emissions of particulate emissions less than 10 microns in diameter (PM_{10}), and sulfur dioxide (SO_2) when firing natural gas in this emissions unit are negligible (less than 10 pounds per day), and therefore emissions limits for these pollutants have not been established.
- 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 burning of natural gas is the only source of PE from this emissions unit since dough does not emit particulates. 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight rate (excludes gaseous fuels) that causes any emissions of particulate matter is equal to zero.
- f. This emissions unit is designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). It is, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment but are subject to the requirements in OAC rule 3745-18-06 as process equipment.
- g. The burning of natural gas is the only source of sulfur dioxide from this emissions unit since dough does not emit sulfur dioxide. Pursuant to OAC rule 3745-18-06(C), this emissions unit is exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.
- h. No liquid organic materials are employed in this emissions unit; therefore, there are no applicable requirements in OAC rule 3745-21-07 or 3745-21-09.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

e) Reporting Requirements

- (1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. 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(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

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:

0.50 lb CO/hr, 2.2 tpy CO

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 84 lbs CO/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr) as shown below:

$$84 \frac{\text{lbs CO}}{\text{mmft}^3} \times 0.006 \frac{\text{mmft}^3}{\text{hr}} = 0.50 \frac{\text{lbs CO}}{\text{hr}}$$

Since the hourly emission limitation was set equal to the potential to emit CO, then compliance with the limitation is assumed.

If required, the permittee shall demonstrate compliance with the hourly CO limitation pursuant to Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton as shown below:

$$0.50 \frac{\text{lbs CO}}{\text{hr}} \times 8760 \frac{\text{hrs}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 2.2 \frac{\text{tons CO}}{\text{yr}}$$

Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0118331]



b. Emission Limitations:

0.60 lb NOx/hr, 2.6 tpy NOx

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NOx/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr) as shown below:

$$100 \frac{\text{lbs NOx}}{\text{mmft}^3} \times 0.006 \frac{\text{mmft}^3}{\text{hr}} = 0.60 \frac{\text{lbs NOx}}{\text{hr}}$$

Since the hourly emission limitation was set equal to the potential to emit NOx, then compliance with the limitation is assumed.

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation pursuant to Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton as shown below:

$$0.60 \frac{\text{lbs NOx}}{\text{hr}} \times 8760 \frac{\text{hrs}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 2.6 \frac{\text{tons NOx}}{\text{yr}}$$

Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0118331]

c. Emission Limitations:

20.0 lbs VOC/hr, 62.4 tpy VOC

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor (determined in accordance with the equation specified in section f)(2) of this permit, lbs VOC/ton of bread) by the emissions unit's maximum hourly production rate (tons/hr) as shown below:

$$3.332 \frac{\text{lbs VOC}}{\text{ton of bread}} \times 6 \frac{\text{tons bread}}{\text{hr}} = 20.0 \frac{\text{lbs VOC}}{\text{hr}}$$

Since the hourly emission limitation was set equal to the potential to emit VOC, then compliance with the limitation is assumed.

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation pursuant to Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the emission factor by the maximum annual production in tons per year and applying the conversion factor of 2000 pounds per ton as shown below:

$$3.332 \frac{\text{lbs VOC}}{\text{ton of bread}} \times 37,440 \frac{\text{tons bread}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 62.4 \frac{\text{tons VOC}}{\text{yr}}$$

The maximum annual production was provided by the permittee and reflects the physical limitations and other regulatory limitations at the facility. Since the annual emission limitation was set equal to the potential to emit VOC, then compliance with the limitation is assumed.

[OAC rule 3745-77-07(C)(1) and PTI P0118331]

- (2) The VOC emission factor referred to in section f)(1)c. may be determined by using the following equation:

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

where:

VOC = emission factor, in pounds of uncontrolled VOC emissions per ton of bread or other yeast-leavened product produced [Note: This is also equal to total organic compounds (OC) per the publication];

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

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

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

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

By entering the variables to the equation that represents the worst case conditions and the potential to emit, as provided by the permittee in the permit application, the emission factor equation becomes the following:

$$\text{VOC} = 0.95(2.5) + 0.195(4.6) - 0.51(1.5) - 0.86(1.25) + 1.90 = 3.332 \frac{\text{lbs VOC}}{\text{ton of bread}}$$

The value for the VOC emission factor is the same for all yeast-leavened products.



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For actual emission calculations, the variables in the emission factor equation should be substituted for actual condition values.

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

[OAC rule 3745-77-07(C)(1) and PTI P0118331].

g) Miscellaneous Requirements

- (1) None.



2. P007, NAV CBL OVEN

Operations, Property and/or Equipment Description:

6,875 lbs/hr spiral-type Bake Tech Bun Oven for the baking of yeast raised buns. Directly fired with natural gas with a maximum heat input rating of 4 mmBTU/hr.

- 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) None.
- 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) [Best Available Technology (BAT) from PTI P0118331 issued on 07/30/2015]	Carbon monoxide (CO) emissions shall not exceed 0.34 lb/hr and 1.5 tons/yr Nitrogen oxides (NOx) emissions shall not exceed 0.40 lbs/hr and 1.8 tons/yr Volatile organic compounds (VOC) shall not exceed 11.5 lbs/hr and 35.7 tons/yr See b)(2)a.-c.
b.	OAC rule 3745-17-07(A)	Exempt. See b)(2)d.
c.	OAC rule 3745-17-11(B)	Exempt. See b)(2)e.
d.	OAC rule 3745-17-10(C)	Exempt. See b)(2)f
e.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)f. and b)(2)g.

- (2) Additional Terms and Conditions
 - a. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) have been determined to be compliance with the emission limitations included in term b)(1)a.
 - b. The emissions limitations for VOC, NOx and CO are based on the emission unit's potential to emit when firing natural gas. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.



- c. The uncontrolled potential emissions of particulate emissions less than 10 microns in diameter (PM_{10}), and sulfur dioxide (SO_2) when firing natural gas in this emissions unit are negligible (less than 10 pounds per day), and therefore emissions limits for these pollutants have not been established.
- 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 burning of natural gas is the only source of PE from this emissions unit since dough does not emit particulates. 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight rate (excludes gaseous fuels) that causes any emissions of particulate matter is equal to zero.
- f. This emissions unit is designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). It is, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment but are subject to the requirements in OAC rule 3745-18-06 as process equipment.
- g. The burning of natural gas is the only source of sulfur dioxide from this emissions unit since dough does not emit sulfur dioxide. Pursuant to OAC rule 3745-18-06(C), this emissions unit is exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.
- h. No liquid organic materials are employed in this emissions unit; therefore, there are no applicable requirements in OAC rule 3745-21-07 or 3745-21-09.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

e) Reporting Requirements

- (1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. 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(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

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:

0.34 lb CO/hr, 1.5 tpy CO

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 84 lbs CO/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr) as shown below:

$$84 \frac{\text{lbs CO}}{\text{mmft}^3} \times 0.004 \frac{\text{mmft}^3}{\text{hr}} = 0.34 \frac{\text{lbs CO}}{\text{hr}}$$

Since the hourly emission limitation was set equal to the potential to emit CO, then compliance with the limitation is assumed.

If required, the permittee shall demonstrate compliance with the hourly CO limitation pursuant to Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton as shown below:

$$0.34 \frac{\text{lbs CO}}{\text{hr}} \times 8760 \frac{\text{hrs}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 1.5 \frac{\text{tons CO}}{\text{yr}}$$

Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0118331]



b. Emission Limitations:

0.40 lb NO_x/hr, 1.8 tpy NO_x

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NO_x/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr) as shown below:

$$100 \frac{\text{lbs NO}_x}{\text{mmft}^3} \times 0.004 \frac{\text{mmft}^3}{\text{hr}} = 0.40 \frac{\text{lbs NO}_x}{\text{hr}}$$

Since the hourly emission limitation was set equal to the potential to emit NO_x, then compliance with the limitation is assumed.

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation pursuant to Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton as shown below:

$$0.40 \frac{\text{lbs NO}_x}{\text{hr}} \times 8760 \frac{\text{hrs}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 1.8 \frac{\text{tons NO}_x}{\text{yr}}$$

Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0118331]

c. Emission Limitations:

11.5 lbs VOC/hr, 35.7 tpy VOC

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the emission factor (determined in accordance with the equation specified in section f)(2) of this permit, lbs VOC/ton of bread) by the emissions unit's maximum hourly production rate (tons/hr) as shown below:

$$3.332 \frac{\text{lbs VOC}}{\text{ton of bread}} \times 3.44 \frac{\text{tons bread}}{\text{hr}} = 11.5 \frac{\text{lbs VOC}}{\text{hr}}$$

Since the hourly emission limitation was set equal to the potential to emit VOC, then compliance with the limitation is assumed.



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If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation pursuant to Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the emission factor by the maximum annual production in tons per year and applying the conversion factor of 2000 pounds per ton as shown below.

$$3.332 \frac{\text{lbs VOC}}{\text{ton of bread}} \times 21,450 \frac{\text{tons bread}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 35.7 \frac{\text{tons VOC}}{\text{yr}}$$

The maximum annual production was provided by the permittee and reflects the physical limitations and other regulatory limitations at the facility. Since the annual emission limitation was set equal to the potential to emit VOC, then compliance with the limitation is assumed.

[OAC rule 3745-77-07(C)(1) and PTI P0118331]

- (2) The VOC emission factor referred to in section f)(1)c. may be determined by using the following equation:

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

where:

VOC = emission factor, in pounds of uncontrolled VOC emissions per ton of bread or other yeast-leavened product produced;

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

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

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

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

By entering the variables to the equation that represent the worst case conditions and the potential to emit, as provided by the permittee in the permit application, the emission factor equation becomes the following:

$$\text{VOC} = 0.95(2.5) + 0.195(4.6) - 0.51(1.5) - 0.86(1.25) + 1.90 = 3.332 \frac{\text{lbs VOC}}{\text{ton of bread}}$$

The value for the VOC emission factor is the same for all yeast-leavened products.

For actual emission calculations, the variables in the emission factor equation should be substituted for actual condition values.



Draft Title V Permit
Alfred Nickles Bakery Inc.
Permit Number: P0108305
Facility ID: 1576160364

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

[OAC rule 3745-77-07(C)(1) and PTI P0118331].

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Pre-BAT Bakery Ovens: P002,P005,P008,

EU ID	Operations, Property and/or Equipment Description
P002	2,600 lb/hr Baker Perkins Model 970 MBL (serial # 54645) Bun Oven for the baking of yeast raised buns and rolls
P005	1,200 lbs/hr AMF Model Tunnel Plate 78-6 (serial # 90272) Sweet Goods Bakery Oven for the baking of sweet rolls
P008	6,875 lbs/hr Baker Perkins Model 970 ABL (serial # 56764) Sandwich Bun Oven for the baking of yeast raised buns

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) None.

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 3745-17-07(A)	Exempt. See b)(2)a.
b.	OAC rule 3745-17-11(B)	Exempt. See b)(2)b.
c.	OAC rule 3745-17-10(C)	Exempt. See b)(2)c.
d.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)c. and b)(2)d.

(1) Additional Terms and Conditions

a. 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.

b. The burning of natural gas is the only source of PE from this emissions unit since dough does not emit particulates. 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight rate (excludes gaseous fuels) that causes any emissions of particulate matter is equal to zero.



- c. This emissions unit is designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of “fuel burning equipment” given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). It is, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment but are subject to the requirements in OAC rule 3745-18-06 as process equipment.
 - d. The burning of natural gas is the only source of sulfur dioxide from this emissions unit since dough does not emit sulfur dioxide. Pursuant to OAC rule 3745-18-06(C), this emissions unit is exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.
 - e. No liquid organic materials are employed in this emissions unit; therefore, there are no applicable requirements in OAC rule 3745-21-07 or 3745-21-09.
- c) Operational Restrictions
 - (1) None.
 - d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
 - e) Reporting Requirements
 - (1) None.
 - 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. None.
 - g) Miscellaneous Requirements
 - (1) For Informational Purposes Only:

For informational purposes associated with determining emissions for reports, emissions for reportable pollutants can be calculated using the methodology located in section f) for emission units P006 and P007 substituting actual usage values for this emissions unit.