



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

4/4/2016

Certified Mail

Stefan Weber
 ORLANDO BAKING CO., INC.
 777 Grand Ave
 Cleveland, OH 44104

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318007764
 Permit Number: P0119445
 Permit Type: Renewal
 County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice 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 and Cleveland Division of Air Quality
 Permit Review/Development Section 2nd Floor
 Ohio EPA, DAPC 75 Erieview Plaza
 50 West Town Street Suite 700 Cleveland, OH 44114
 PO Box 1049
 Columbus, Ohio 43216-1049

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 issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 CDAQ; Pennsylvania; Canada

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (Renewal FEPTIO to avoid Title V)

Netting Determination

2. Source Description:

Orlando Baking Co. Inc., a commercial bakery oven facility, has submitted a renewal application for a Federally Enforceable Permit to Install and Operate (FEPTIO) permit. The operations covered by this permit application are 4 bread baking ovens P001 through P004, one tray oven, P005, and one indirect fired oven, P006.

3. Facility Emissions and Attainment Status:

This facility previously had the potential to emit (PTE) volatile organic compound (VOC) emissions in excess of 100 TPY which would result in Title V applicability.

Cuyahoga County is currently designated as non-attainment for ozone (VOC and NO_x precursor), partial non-attainment for lead, and non-attainment for PM_{2.5} (SO₂ and NO_x precursors).

4. Source Emissions:

Orlando Baking Co is requesting to renew their FEPTIO permit that contains federally enforceable limitations that restrict the facility-wide VOC emissions to 83.3 tons, based upon a rolling, 12-month summation (excluding products of combustion). Orlando Baking Co. will be required to track the VOC emissions, keep monthly records, and submit quarterly and annual reports.

5. Conclusion:

Limiting the annual facility wide VOC emissions to 83.3 tons based on a rolling, 12-month summation (excluding products of combustion), will not subject the Orlando Baking Co. Inc. to Title V permitting.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	83.3
NO _x	16.45
CO	15.39

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 Air Pollution Permit-to-Install and Operate Renewal
ORLANDO BAKING CO., INC.

7777 Grand Ave.,, Cleveland, OH 44104

ID#:P0119445

Date of Action: 4/4/2016

Permit Desc:FEPTIO renewal permit for baking ovens P001 through P004, one tray oven P005, and one indirect-fired oven P006..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ORLANDO BAKING CO., INC.**

Facility ID:	1318007764
Permit Number:	P0119445
Permit Type:	Renewal
Issued:	4/4/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
ORLANDO BAKING CO., INC.

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Draft Permit-to-Install and Operate

ORLANDO BAKING CO., INC.

Permit Number: P0119445

Facility ID: 1318007764

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318007764
Application Number(s): A0054139
Permit Number: P0119445
Permit Description: FEPTIO renewal permit for baking ovens P001 through P004, one tray oven P005, and one indirect-fired oven P006.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/4/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

ORLANDO BAKING CO., INC.
7777 Grand Ave.
Cleveland, OH 44104

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0119445

Permit Description: FEPTIO renewal permit for baking ovens P001 through P004, one tray oven P005, and one indirect-fired oven P006.

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

Emissions Unit ID: P004
 Company Equipment ID: OVEN 7 - 85 FT. OVEN
 Superseded Permit Number: P0094810
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P005
 Company Equipment ID: Oven #8
 Superseded Permit Number: P0105059
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P006
 Company Equipment ID: Oven #9
 Superseded Permit Number: P0105059
 General Permit Category and Type: Not Applicable

Group Name: Baking Ovens #1, 3 and 4

Emissions Unit ID:	P001
Company Equipment ID:	OVEN 1 - 100 FT. OVEN
Superseded Permit Number:	P0094810
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	OVEN 3 - 65 FT. OVEN
Superseded Permit Number:	P0094810
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	OVEN 4 - 100 FT. OVEN
Superseded Permit Number:	P0094810
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
ORLANDO BAKING CO., INC.
Permit Number: P0119445
Facility ID: 1318007764
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
ORLANDO BAKING CO., INC.
Permit Number: P0119445
Facility ID: 1318007764
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

ORLANDO BAKING CO., INC.

Permit Number: P0119445

Facility ID: 1318007764

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Draft Permit-to-Install and Operate
ORLANDO BAKING CO., INC.
Permit Number: P0119445
Facility ID: 1318007764
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. P004, OVEN 7 - 85 FT. OVEN

Operations, Property and/or Equipment Description:

Baking Oven No. 7

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b(1)f., c(2), d(2), e(2), and f(1)h.
- 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) (Permit P0094810 issued October 15, 2009)	<p>Volatile organic compound (VOC) emissions shall not exceed 20.10 lbs/hour from bread baking.</p> <p>Nitrogen oxide (NO_x) emissions shall not exceed 0.20 lb/hour and 0.88 ton/year from the 2.00 mmBtu/hour natural gas-fired burner.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.16 lb/hour and 0.70 ton/year from the 2.00 mmBtu/hour natural gas-fired burner.</p> <p>Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a six-minute average.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input.
d.	OAC rule 3745-18-06	Exempt - see c)(1) below.
e.	OAC rule 3745-21-12	Exempt - see b)(2)a. below.
f.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V	The combined annual VOC emissions from P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

- a. Commercial bakery oven facilities that have federally enforceable limitations limiting them below 100 TPY of VOC emissions are exempt from OAC rule 3745-21-12 for Cuyahoga County.
- b. The pound per hour emission limitations for VOC, NO_x and CO reflect the maximum potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall determine the emission factor (EF) established by the following equation for VOC emissions for each different recipe used in bread and bun baking operations taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6 "Bread Baking":

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

ti = total yeast action time in hours

S = final (spike) baker's percentage of yeast

ts = spiking time in hours

The total combined bread and buns produced in P001-P006 shall be restricted on a rolling, 12-month summation using the following equation:

$$n \sum_{i=1} [EF \text{ VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) + X \leq 83.3.0 \text{ tons VOC/rolling 12-month period}$$

Where

i = each different recipe used in baking operations

X = total VOC emissions for the past 11 months

The total combined emissions of VOC from P001-P006 shall not exceed 83.3 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for P001-P006 combined:
 - a. the name and identification of each recipe produced;
 - b. the total amount of baked goods produced per recipe, in tons per month;
 - c. the emission factor for each recipe as calculated in c)(2);
 - d. the total monthly VOC emissions, in tons, for each recipe by summing [(b. x c.)/2,000] for all recipes produced in accordance with c)(2) above; and
 - e. the rolling 12-month summation of total VOC emission, in tons.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be

noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitation for VOC.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 20.10 lbs/hr from bread baking.

Applicable Compliance Method:

The pound per hour VOC emission limitation was established based on the maximum potential to emit for the emissions unit. The potential to emit was determined for each product baked by multiplying the emission factor established by the equation for VOC emissions from bread baking operations that was taken



from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6, "Bread Baking" by the maximum amount of bread produced, in tons per hour.

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast

t_s = spiking time in hours

b. Emission Limitation:

NO_x emissions shall not exceed 0.20 lb/hour from the 2.00 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

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

c. Emission Limitation:

NO_x emissions shall not exceed 0.88 ton/year from the 2.00 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate established in f)(1)b. by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

d. Emission Limitation:

CO emissions shall not exceed 0.16 lb/hour from the 2.00 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

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

e. Emission Limitation:

CO emissions shall not exceed 0.70 ton/year from the 2.00 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate established in f)(1)d. by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the pound per mmBtu emissions limit shall be shown by dividing the emission factor from Section 1.4 (“Natural Gas Consumption”) of AP-42, Fifth Edition, Volume 1, Chapter 1 by 1,020 mmBtu/10⁶scf.

h. Emission Limitation:

The combined annual VOC emissions for P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:

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

n



Draft Permit-to-Install and Operate

ORLANDO BAKING CO., INC.

Permit Number: P0119445

Facility ID: 1318007764

Effective Date: To be entered upon final issuance

$$\sum_{i=1} [EF \text{ VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) = \text{tons VOC/month}$$

Where

i = each different recipe used in baking operations

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

g) Miscellaneous Requirements

- (1) Emissions unit P004 was installed in 1996.



2. P005, Oven #8

Operations, Property and/or Equipment Description:

50 foot oven direct fired -two pass -Baker -Perkins model # 970 tray oven

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

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

a. None.

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

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

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) (Permit P0105059 issued October 15, 2009)	<p>Volatile organic compound (VOC) emissions shall not exceed 20.10 lbs/hour from bread baking.</p> <p>Nitrogen oxide (NO_x) emissions shall not exceed 0.28 lb/hour and 1.23 tons/year from the 2.83 mmBtu/hour natural gas-fired burner.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.23 lb/hour and 1.01 tons/year from the 2.83 mmBtu/hour natural gas-fired burner.</p> <p>Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a six-minute average.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input.
d.	OAC rule 3745-18-06	Exempt - see c)(1) below.
e.	OAC rule 3745-21-12	Exempt - see b)(2)a. below.
f.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V	The combined annual VOC emissions from P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

- a. Commercial bakery oven facilities that have federally enforceable limitations limiting them below 100 TPY of VOC emissions are exempt from OAC rule 3745-21-12 for Cuyahoga County.
- b. The pound per hour emission limitations for VOC, NO_x and CO reflect the maximum potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall determine the emission factor (EF) established by the following equation for VOC emissions for each different recipe used in bread and bun baking operations taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6 "Bread Baking":

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

ti = total yeast action time in hours

S = final (spike) baker's percentage of yeast

ts = spiking time in hours

The total combined bread and buns produced in P001-P006 shall be restricted on a rolling, 12-month summation using the following equation:

n

$$\sum_{i=1}^n [EF \text{ VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) + X$$

i=1

≤ 83.3 tons VOC/rolling 12-month period

Where

i = each different recipe used in baking operations

X = total VOC emissions for the past 11 months

The total combined emissions of VOC from P001-P006 shall not exceed 83.3 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for P001-P006 combined:
 - a. the name and identification of each recipe produced;
 - b. the total amount of baked goods produced per recipe, in tons per month;
 - c. the emission factor for each recipe as calculated in c)(2);
 - d. the total monthly VOC emissions, in tons, for each recipe by summing [(b. x c.)/2,000] for all recipes produced in accordance with c)(2) above; and
 - e. the rolling 12-month summation of total VOC emission, in tons.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be

noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitation for VOC.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
VOC emissions shall not exceed 20.10 lbs/hr from bread baking.

Applicable Compliance Method:

The pound per hour VOC emission limitation was established based on the maximum potential to emit for the emissions unit. The potential to emit was determined for each product baked by multiplying the emission factor established by the equation for VOC emissions from bread baking operations that was taken

from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6, "Bread Baking" by the maximum amount of bread produced, in tons per hour.

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast

t_s = spiking time in hours

b. Emission Limitation:

NO_x emissions shall not exceed 0.28 lb/hour from the 2.83 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

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

c. Emission Limitation:

NO_x emissions shall not exceed 1.23 tons/year from the 2.83 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate established in f)(1)b. by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

d. Emission Limitation:

CO emissions shall not exceed 0.23 lb/hour from the 2.83 mmBtu/hour natural gas-fired burner.



Applicable Compliance Method:

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

e. Emission Limitation:

CO emissions shall not exceed 1.01 tons/year from the 2.83 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate established in f)(1)d. by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the pound per mmBtu emissions limit shall be shown by dividing the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by 1,020 mmBtu/10⁶scf.

h. Emission Limitation:

The combined annual VOC emissions for P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:

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

n

$$\sum [EF \text{ VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) = \text{tons VOC/month}$$



$i=1$

Where

i = each different recipe used in baking operations

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

g) Miscellaneous Requirements

- (1) Emissions unit P005 was installed in 2003.



3. P006, Oven #9

Operations, Property and/or Equipment Description:

50 foot oven indirect fired -one pass -Mechatherm model # FTM-0016

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

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

a. None.

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

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

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) (Permit P0105059 issued October 15, 2009)	Volatile organic compound (VOC) emissions shall not exceed 20.10 lbs/hour from bread baking.
b.	OAC rule 3745-31-05(A)(3)	Nitrogen oxide (NO _x) emissions shall not exceed 0.29 lb/hour and 1.27 tons/year from the 3.00 mmBtu/hour natural gas-fired burner. Carbon monoxide (CO) emissions shall not exceed 0.25 lb/hour and 1.10 tons/year from the 3.00 mmBtu/hour natural gas-fired burner. Particulate emissions (PE) shall not exceed 0.02 lb/hour and 0.09 ton/year from the 3.00 mmBtu/hour natural gas-fired burner. See b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(a)(ii) (Permit P0105059 issued October 15, 2009)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO _x and CO emissions from this air contaminant source since the uncontrolled potential to emit for NO _x and CO is less than ten tons per year. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emissions rate for particulate emissions is less than 10 tons/year taking into account the federally enforceable rule limit of 0.020 lb of particulate emissions per mmBtu of actual heat input under SIP approved OAC rule 3745-17-10(B)(1). See b)(2)b. below.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input. See b)(2)b. below.
f.	OAC rule 3745-18-06	Exempt - see c)(1) below.
g.	OAC rule 3745-21-12	Exempt - see b)(2)c. below.
h.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V	The combined annual VOC emissions from P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the



less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

- b. 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.
- c. Commercial bakery oven facilities that have federally enforceable limitations limiting them below 100 TPY of VOC emissions are exempt from OAC rule 3745-21-12 for Cuyahoga County.
- d. The pound per hour emission limitations for VOC, NO_x and CO reflect the maximum potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall determine the emission factor (EF) established by the following equation for VOC emissions for each different recipe used in bread and bun baking operations taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6 "Bread Baking":

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast

t_s = spiking time in hours

The total combined bread and buns produced in P001-P006 shall be restricted on a rolling, 12-month summation using the following equation:

n

$$\sum_{i=1}^n [\text{EF VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) + X$$

i=1

≤ 83.3 tons VOC/rolling 12-month period

Where

i = each different recipe used in baking operations

X = total VOC emissions for the past 11 months

The total combined emissions of VOC from P001-P006 shall not exceed 83.3 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for P001-P006 combined:
 - a. the name and identification of each recipe produced;
 - b. the total amount of baked goods produced per recipe, in tons per month;
 - c. the emission factor for each recipe as calculated in c)(2);
 - d. the total monthly VOC emissions, in tons, for each recipe by summing [(b. x c.)/2,000] for all recipes produced in accordance with c)(2) above; and
 - e. the rolling 12-month summation of total VOC emission, in tons.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitation for VOC.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

- a. Emission Limitation:
VOC emissions shall not exceed 20.10 lbs/hr.

Applicable Compliance Method:

The pound per hour VOC emission limitation was established based on the maximum potential to emit for the emissions unit. The potential to emit was determined by multiplying the emission factor established by the equation for VOC emissions from bread baking operations that was taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6, "Bread Baking" by the maximum amount of bread produced, in tons per hour.

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast

t_s = spiking time in hours

- b. Emission Limitation:
Nitrogen oxide (NO_x) emissions shall not exceed 0.29 lb/hour and 1.27 tons/year from the 3.00 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by the mmBtu/hour rating of the natural gas-fired

burner. Since the emissions factor is given in a volume format, it was converted to an energy basis by dividing the given factor by 1,020 mmBtu/10⁶scf.

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

c. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.25 lb/hour and 1.10 tons/year from the 3.00 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

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

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

d. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.02 lb/hour and 0.09 ton/year from the 3.00 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

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

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

e. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.



f. Emission Limitation:
Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input.

Applicable Compliance Method:
Compliance with the pound per mmBtu emissions limit shall be shown by dividing the emission factor from Section 1.4 (“Natural Gas Consumption”) of AP-42, Fifth Edition, Volume 1, Chapter 1 by 1,020 mmBtu/10⁶scf.

g. Emission Limitation:
The combined annual VOC emissions for P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

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

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

Where

i = each different recipe used in baking operations

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

g) Miscellaneous Requirements

(1) Emissions unit P006 was installed in 2007.



4. Emissions Unit Group -Baking Ovens #1, 3 and 4: P001,P002,P003,

EU ID	Operations, Property and/or Equipment Description
P001	Baking Oven No. 1
P002	Baking Oven No. 3
P003	Baking Oven No. 4

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b(1)f., c(2), d)(2), e)(2), and f)(1)h.
- 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) (Permit P0094810 issued October 15, 2009)	<p>Volatile organic compound (VOC) emissions shall not exceed 20.10 lbs/hour from bread baking.</p> <p>Nitrogen oxide (NO_x) emissions shall not exceed 0.33 lb/hour and 1.45 tons/year from the 3.36 mmBtu/hour natural gas-fired burner.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.28 lb/hour and 1.23 tons/year from the 3.36 mmBtu/hour natural gas-fired burner.</p> <p>Visible particulate emissions from the stack(s) serving this emissions unit shall</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		not exceed 5% opacity as a six-minute average.
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input.
d.	OAC rule 3745-18-06	Exempt - see c)(1) below.
e.	OAC rule 3745-21-12	Exempt - see b)(2)a. below.
f.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V	The combined annual VOC emissions from P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

- a. Commercial bakery oven facilities that have federally enforceable limitations limiting them below 100 TPY of VOC emissions are exempt from OAC rule 3745-21-12 for Cuyahoga County.
- b. The pound per hour emission limitations for VOC, NO_x and CO reflect the maximum potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall determine the emission factor (EF) established by the following equation for VOC emissions for each different recipe used in bread and bun baking operations taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6 "Bread Baking":

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast

t_s = spiking time in hours

The total combined bread and buns produced in P001-P006 shall be restricted on a rolling, 12-month summation using the following equation:

n

$$\sum_{i=1}^n [EF_{VOC_i} \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) + X$$

i=1

≤ 83.3 tons VOC/rolling 12-month period

Where

i = each different recipe used in baking operations

X = total VOC emissions for the past 11 months

The total combined emissions of VOC from P001-P006 shall not exceed 83.3 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for P001-P006 combined:
 - a. the name and identification of each recipe produced;
 - b. the total amount of baked goods produced per recipe, in tons per month;
 - c. the emission factor for each recipe as calculated in c)(2);
 - d. the total monthly VOC emissions, in tons, for each recipe by summing [(b. x c.)/2,000] for all recipes produced in accordance with c)(2) above; and
 - e. the rolling 12-month summation of total VOC emission, in tons.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitation for VOC.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
VOC emissions shall not exceed 20.10 lbs/hr from bread baking.

Applicable Compliance Method:

The pound per hour VOC emission limitation was established based on the maximum potential to emit for the emissions unit. The potential to emit was determined for each product baked by multiplying the emission factor established by the equation for VOC emissions from bread baking operations that was taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6, "Bread Baking" by the maximum amount of bread produced, in tons per hour.

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast

t_s = spiking time in hours

b. Emission Limitation:

NO_x emissions shall not exceed 0.33 lb/hour from the 3.36 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

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

c. Emission Limitation:

NO_x emissions shall not exceed 1.45 tons/year from the 3.36 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate established in f)(1)b. by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

d. Emission Limitation:

CO emissions shall not exceed 0.28 lb/hour from the 3.36 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

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

e. Emission Limitation:

CO emissions shall not exceed 1.23 tons/year from the 3.36 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate established in f)(1)d. by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the pound per mmBtu emissions limit shall be shown by dividing the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by 1,020 mmBtu/10⁶scf.

h. Emission Limitation:

The combined annual VOC emissions for P001-P006 shall not exceed 83.3 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:

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

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Draft Permit-to-Install and Operate

ORLANDO BAKING CO., INC.

Permit Number: P0119445

Facility ID: 1318007764

Effective Date: To be entered upon final issuance

$$\sum_{i=1} [EF \text{ VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) = \text{tons VOC/month}$$

Where

i = each different recipe used in baking operations

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

g) Miscellaneous Requirements

- (1) Emissions units P001 and P003 were installed in 1978, and emissions unit P002 was installed in 1990.