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State of Ohio Environmental Protection Agency

MAY - 5 2008

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Ohio Environmental Protection Agency  
Southeast District  
Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

04/21/08

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

F002 (Flour Silo #2)Flour Silo #2

New Bakery Company of Ohio Plant 2 (06-60-01-0244)  
Sam McLaughlin  
750 Airport Rd.  
Zanesville, OH 43701

Dear Sam McLaughlin:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (800) 329-7518. For more information related to air pollution control in Ohio, visit [www.epa.state.oh/dapc](http://www.epa.state.oh/dapc).

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

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Southeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Southeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 04/21/08

Expiration Date: 04/21/13

This document constitutes issuance to:

Facility ID: 06-60-01-0244  
New Bakery Company of Ohio Plant 2  
3005 EastPointe Dr.  
Zanesville, OH 43701

of a permit to operate for:

F002 (Flour Silo #2)  
Flour Silo #2

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

## Part I: General Terms and Conditions

### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. 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.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

### 4. Records Retention Requirements

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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

**6. Scheduled Maintenance/Malfunction Reporting**

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 unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency 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 this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. 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.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u>                                  | <u>Applicable Emissions Limitations/Control Measures</u>  |
|---|--|---|
| F002 - Flour silo No. 2                       | OAC rule 3745-31-05 (A)(3)<br>PTI # 06-06403<br>Date Issued: 8/28/2001 | <p>The silo truck loading operations shall be vented to a baghouse which will achieve an outlet emission rate of not greater than 0.030 gr/dscf or no visible emissions, whichever is less stringent.</p> <p>Total particulate emissions from the baghouse shall not exceed 0.56 tons per year.</p> <p>The emission limitation specified by these rules are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).</p> |
|   | OAC rule 3745-17-11<br>OAC rule 3745-17-07(A)                          |   |

**2. Additional Terms and Conditions**

None

**B. Operational Restrictions**

- Flour shall be transferred pneumatically to storage. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emission of flour from the delivery vehicle shall be cause for the halt of the unloading process until the situation is corrected.

**C. Monitoring and/or Record Keeping Requirements**

- 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:
  - the color of the emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

#### D. Reporting Requirements

1. The permittee shall submit semiannual written reports that:
  - a identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and
  - b describe any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### E. Testing Requirements

1. Emissions Limitation:  
The silo truck unloading operations shall be vented to a baghouse which will achieve an outlet emission rate of not greater than 0.030 gr/dscf.

Compliance Method:

Compliance with the particulate matter emission limit of 0.030 grain per dry standard cubic foot of exhaust gases shall be determined based on emission testing conducted in accordance with OAC rule 3745-17-03. Emission testing is not specifically required to demonstrate compliance with this emission limitation, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

2. Emissions Limitation:  
The silo truck unloading operations shall be vented to a baghouse which will exhibit or no visible emissions.

Compliance Method:

Compliance with the no visible emission limit for the exhaust from the dust collector shall be determined using Test Method 22-like visible emission observations. Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.

3. Emissions Limitation:  
Total particulate emissions from the baghouse shall not exceed 0.56 tons per year.

Compliance Method:

Compliance with the particulate matter emission limit of 0.56 tons per year shall be determined in accordance with the following equation:  
$$\text{tons PM/year} = (0.030 \text{ gr/dscf}) \times (500 \text{ dscf/min}) \times (\text{lb/7000 gr}) \times (60 \text{ min/hour}) \times (\text{ton/2000 lbs}) \times (\text{actual hours of operation/year})$$

The flow rate of 500 dscf/min represents the maximum flow rate of exhaust gases from the control equipment, based on company data.

#### F. Miscellaneous Requirements

None