



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

11/2/2016

Certified Mail

JEFF MILLER
 White Castle System, Inc.
 555 WEST GOODDALE ST.
 COLUMBUS, OH 43215

No	TOXIC REVIEW
Yes	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: 1431151190
 Permit Number: P0121476
 Permit Type: OAC Chapter 3745-31 Modification
 County: Hamilton

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 Cincinnati Enquirer. 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 Southwest Ohio Air Quality Agency
 Permit Review/Development Section 250 William Howard Taft Rd.
 Ohio EPA, DAPC Cincinnati, OH 45219
 50 West Town Street Suite 700
 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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 SWOAQA; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

White Castle System, Inc. (White Castle) proposes to expand the flour handling (P001) and bun baking operation (P003) from 5,200 dozen buns per hour to 8,000 buns per hour. Potential emissions of VOC raise the facility-wide emission rate above 100 tons per year, therefore Synthetic Minor limits will restrict potential VOC emissions to below major source thresholds, and avoid Title V permitting and New Source Review for VOC..

3. Facility Emissions and Attainment Status:

White Castle is an existing minor source facility located in Hamilton County. Hamilton County is in attainment for all criteria pollutants except ozone and PM2.5.

4. Source Emissions:

Potential emissions of PE/PM10/PM2.5, NOx and CO for emissions units P001 and P003 are below 10 TPY, therefore no annual limitations are required to restrict potential emissions below major thresholds. Potential emissions of VOC from P003 would be 165.87 tons per year before controls and emission limitations. Potential emissions of VOC, taking into account Synthetic Minor limitations, would be limited to 8.41 tons per year.

5. Conclusion:

Synthetic Minor limit of 8.41 tons VOC per year will limit potential emissions below major source threshold, therefore not subject to Title V requirements or New Source Review for VOC. Quarterly reports will be required to ensure compliance.

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>
<u>PE</u>	<u>1.44</u>
<u>PM10</u>	<u>0.84</u>
<u>PM2.5</u>	<u>0.84</u>
<u>VOC</u>	<u>8.41</u>

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 OAC Chapter 3745-31 Modification

White Castle System, Inc.

3126 EXON AVE., Evendale, OH 45241

ID#:P0121476

Date of Action: 11/2/2016

Permit Desc:Chapter 31 Modification permit to increase production rate of bakery oven and flour handling process..

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: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
White Castle System, Inc.**

Facility ID:	1431151190
Permit Number:	P0121476
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	11/2/2016
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
White Castle System, Inc.

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Draft Permit-to-Install and Operate

White Castle System, Inc.

Permit Number: P0121476

Facility ID: 1431151190

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431151190
Application Number(s): A0055744
Permit Number: P0121476
Permit Description: Chapter 31 Modification permit to increase production rate of bakery oven and flour handling process.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/2/2016
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:

White Castle System, Inc.
3126 EXON AVE
Evendale, OH 45241

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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



Draft Permit-to-Install and Operate

White Castle System, Inc.

Permit Number: P0121476

Facility ID: 1431151190

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0121476

Permit Description: Chapter 31 Modification permit to increase production rate of bakery oven and flour handling process.

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

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

P001

Pneumatic Flour Handling Equip
P0069822
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

P003

BakeTech Oven B4100
P0108136
Not Applicable



Draft Permit-to-Install and Operate
White Castle System, Inc.
Permit Number: P0121476
Facility ID: 1431151190
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 Southwest Ohio Air Quality Agency 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
White Castle System, Inc.
Permit Number: P0121476
Facility ID: 1431151190
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2. thru 5.
2. The total allowable emissions of Volatile Organic Compounds (VOCs), from emissions units P001 and P003, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 8.41 TPY. Compliance with the VOC limitation shall be based on a rolling, 12-month summation.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC emissions, upon issuance of this permit.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2:
 - a) total VOC emissions, in tons; and
 - b) the rolling, 12-month VOC emissions, in tons;
4. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

emission limitations specified in 2. above;
 - 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.



Draft Permit-to-Install and Operate

White Castle System, Inc.

Permit Number: P0121476

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

5. Compliance with the emission limitations in 2. above of these terms and conditions shall be determined in accordance with the following methods:

a) Emission Limitation:

8.41 TPY for VOC is based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in 3.



Draft Permit-to-Install and Operate
White Castle System, Inc.
Permit Number: P0121476
Facility ID: 1431151190
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, PNEUMATIC FLOUR HANDLING EQUIP

Operations, Property and/or Equipment Description:

flour handling system

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	0.10 tons PE per month averaged over a twelve-month period. 0.05 tons PM10 per month averaged over a twelve-month period. 0.05 tons PM2.5 per month averaged over a twelve-month period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM10 and PM2.5 emissions from this air contaminant source since the potential to emit is less than ten tons/year. See b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the flour handling filter outlets shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	Reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust.

(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 paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. All of the PE/PM10/PM2.5 emissions from flour unloading, flour sifting, flour hoppers and flour mixers shall be vented to the flour handling filters that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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 an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the flour handling filter outlets;



- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the flour handling filter outlets and/or visible emissions of fugitive dust.

f) Testing Requirements

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

a. Emission Limitation:

0.10 tons PE per month averaged over a twelve-month period.

0.05 tons PM10 per month averaged over a twelve-month period.

0.05 tons PM2.5 per month averaged over a twelve-month period.

Applicable Compliance Method:

The PE/PM10/PM2.5 monthly emissions shall be calculated and compliance determined using the flour handling rates, emission factors and control efficiencies submitted in PTIO application #A0055744, received on August 19, 2016.

b. Emission Limitation:

Visible particulate emissions from the flour handling filter outlets shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).



Draft Permit-to-Install and Operate

White Castle System, Inc.

Permit Number: P0121476

Facility ID: 1431151190

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



2. P003, BakeTech Oven B4100

Operations, Property and/or Equipment Description:

8,000 dozen buns per hour bakery 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. b)(1)b.

(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).c., b)(1)e., and c)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	0.02 tons PE/PM10/PM2.5 per month averaged over a rolling twelve-month period. 0.44 tons NOx per month averaged over a rolling twelve-month period. 0.26 tons CO per month averaged over a rolling twelve-month period. See b)(2)a. and b)(2)c. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM10, PM2.5, NOx, and CO emissions from this air contaminant source since the potential to emit is less than ten tons/year. The Best Available Technology (BAT) requirements under OAC rule 3745-31-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable restriction in a)(1)a. above. See b)(2)b. below.
c.	OAC rule 3745-31-05(D) June 30, 2008 Synthetic Minor to avoid Title V and Non-Attainment New Source Review for VOC.	See 2. of Section B.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-21-12	See b)(2)c., d)(1) – d)(9), e)(3) and f)(2).

(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 paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The permittee shall install and operate a VOC emission control system that reduces the VOC emissions from each bakery oven by at least ninety-five per cent by weight (i.e., an overall control efficiency of at least ninety-five per cent by weight).

c) Operational Restrictions

- (1) The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall install and operate continuous monitoring and recording devices for the inlet temperature and the temperature rise across the catalytic oxidizer catalyst bed.
- (2) While operating the bakery oven, the permittee shall maintain the inlet temperature and the temperature rise across the catalytic oxidizer catalyst bed within the baseline operational data established during the most recent compliance test that demonstrated compliance.
- (3) The owner or operator shall inspect the VOC emission control system and monitoring equipment to assure that the control system is operating properly, and that no leaks or malfunctions have occurred or are occurring. The inspections shall be made at the frequency defined by the equipment manufacturer, or as otherwise appropriate for each unit, component, or operation, but not less than monthly.
- (4) The permittee shall record the results of each inspection in a permanent log to be retained on-site for a period of not less than five years and shall make the log available to the director or any authorized representative of the director for review during normal business hours.
- (5) The permittee shall keep the records required under d)(1) to d)(4) on site for at least five years following the date of the record and shall make such records available to the director or any authorized representative of the director for review during normal business hours.
- (6) The permittee shall keep monthly production period records of the following operational data for each yeast-leavened product for each bakery oven:
 - a. the amount of raw product processed;
 - b. the baker's per cent of yeast used (initial yeast and any spike yeast);
 - c. the fermentation time (total time and any spiking time);
 - d. the type of product baked;
 - e. the amount of product baked; and
 - f. any other information that the director may determine to be necessary for determining that the facility is operated in continuous compliance with this rule.
- (7) The permittee shall calculate monthly VOC emissions for each bakery oven and shall record the emission factor used for each product, including a citation of the source of the emission factor, and the results of the VOC emission calculations.
- (8) The permittee shall collect and record the following information each day of operation of the bakery oven:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated bakery oven; and
 - b. for the catalytic oxidizer,



a. Emission Limitation:

0.02 tons PE/PM10/PM2.5 per month averaged over a twelve-month period.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 7.6 pounds of particulate emissions per mm standard cubic feet by the emissions unit's maximum annual natural gas burning capacity (75.38 mm cu. ft./yr.) and dividing by 2000. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

b. Emission Limitation:

0.44 tons NOx per month averaged over a twelve-month period.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 140 pounds of NOx per mm standard cubic feet by the emissions unit's maximum annual natural gas burning capacity (75.38 mm cu. ft./yr.) and dividing by 2000. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

c. Emission Limitation:

0.26 tons CO per month averaged over a twelve-month period.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 84 pounds of CO per mm standard cubic feet by the emissions unit's maximum annual natural gas burning capacity (75.38 mm cu. ft./yr.) and dividing by 2000. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

d. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.



- (2) The permittee shall demonstrate compliance by conducting compliance testing in accordance with the following:
 - a. The general provisions specified under paragraphs (A)(2) to (A)(5) of rule 3745-21-10 of the Ohio Administrative Code shall apply to the compliance testing.
 - b. The test methods and procedures of paragraph (C) of rule 3745-21-10 of the Ohio Administrative Code shall be followed, except as follows:
 - i. The concentration of VOC in a gas stream or exhaust vent shall be determined by utilizing any of the methods specified under paragraph (C)(2) of rule 3745-21-10 of the Ohio Administrative Code.
 - ii. USEPA alternative test method ALT-020 titled "Negative Pressure Enclosure Qualitative Test Method for Bakery Ovens" may be used to demonstrate capture efficiency of a bakery oven. A bakery oven that passes this alternative test method and vents all of its oven exhaust gas streams, other than the purge stack, to a VOC control device has a VOC capture efficiency of one hundred per cent by weight.
 - iii. USEPA conditional test method CTM-042 titled "Use of Flame Ionization Detector-Methane Cutter Analysis Systems for VOC Compliance Testing of Bakeries" may be used to demonstrate the control efficiency of a VOC control device (thermal oxidizer or catalytic oxidizer) for a bakery oven.
 - g) Miscellaneous Requirements
 - (1) None.