

Facility ID: 1431070662 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit B001](#)
- [Go to Part II for Emissions Unit B002](#)
- [Go to Part II for Emissions Unit P017](#)

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Facility ID: 1431070662 Emissions Unit ID: B001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. 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> |
|--|--------------------------------------|--|
| B001 - 24.2 MMBTU/HR Gas fired Boiler (option of oil or propane use during NG curtailment) | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule. |
| | OAC rule 3745-17-10(B)(1) | Particulate emissions shall not exceed 0.020 pound (lb) per million BTU (MMBtu) actual heat input |
| | OAC rule 3745-18-06(C) | Sulfur dioxide emissions shall not exceed 1.6 lbs per MMBtu actual heat input |

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

C. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the director.

D. Reporting Requirements

1. The permittee shall notify the director (the appropriate District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
 - a. 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:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

c. Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.6 lbs per MMBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

F. Miscellaneous Requirements

- 1. None

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. 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> |
|--|--------------------------------------|--|
| B002 - 24.2 MMBTU/HR Gas fired Boiler (option of oil or propane use during NG curtailment) | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule. |
| | OAC rule 3745-17-10(B)(1) | Particulate emissions shall not exceed 0.020 pound (lb) per million BTU (MMBtu) actual heat input |
| | OAC rule 3745-18-06(C) | Sulfur dioxide emissions shall not exceed 1.6 lbs per MMBtu actual heat input |

- 2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

- 1. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

C. Monitoring and/or Record Keeping Requirements

- 1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the director.

D. Reporting Requirements

1. The permittee shall notify the director (the appropriate District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

a. 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:
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

c. Emission Limitation:
Sulfur dioxide emissions shall not exceed 1.6 lbs per MMBtu actual heat input.

Applicable Compliance Method:
Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

F. Miscellaneous Requirements

1. None

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Facility ID: 1431070662 Emissions Unit ID: P017 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. 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> |
|---|--|---|
| P017 - No. 1 baking oven for saline crackers | OAC rule 3745-31-05(A)(3) (PTI #14-299) | The requirements of this rule include compliance with OAC rules 3745-17-07(A)(1), 3745-17-11(A) and 3745-21-12. |
| | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as |

- specified by rule.
- OAC rule 3745-17-11(A) Particulated emissions (PE) shall not exceed 0.551 pound per hour.
- OAC rule 3745-21-12(D)(1) See term A.2.a.
2. **Additional Terms and Conditions**
- (a) The permittee shall operate a VOC emission control system that reduces the VOC emissions from each bakery oven by at least ninety-five percent by weight (i.e., an overall control efficiency of at least ninety-five percent by weight).
- B. Operational Restrictions**
1. None
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall properly operate and maintain equipment to continuously monitor and record the inlet temperature and the temperature rise across the catalyst bed.
2. While operating the bakery oven, the permittee shall maintain the parameters listed in paragraphs (C)(1)(a) to (C)(1)(c) of OAC rule 3745-21-12 within the baseline operational data established during the most recent compliance test(s) that demonstrate compliance.
3. The permittee shall perform monthly inspections of 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 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.
4. 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 percent yeast used (initial yeast and any spike yeast);
- c. The fermentation time (total time and any spiking time);
- d. The type 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.
5. 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.
6. The permittee shall collect and record the following information on a daily basis:
- a. A log of operating time for the capture (collection) system, control device, monitoring equipment and the associated bakery oven.
- b. All three-hour periods of operation during which the average temperature of the process vent stream immediately before the catalyst bed is more than 50 degrees Fahrenheit below the average temperature of the process vent stream during the most recent performance test that demonstrated that the source was in compliance, and all three-hour periods of operation during which the average temperature difference across the catalyst bed is less than eighty percent of the average temperature during the most recent performance test that demonstrated that the bakery oven was in compliance.
- D. Reporting Requirements**
1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly summaries of the records required by Section C.6 of this permit.
- These quarterly reports shall be submitted by April 30, July 31, October 31, and January 30, and shall cover the records for the previous calendar quarter.
- E. Testing Requirements**
1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
- a. 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 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
- b. Emission Limitation:
Particulate emissions shall not exceed 0.551 lb/MMBtu actual heat input
- Applicable Compliance Method:
The hourly and annual emission limitations specified above are based on the OAC rule allowable limit for

particulate emissions of 0.551 lb/mmBtu and exceed the emission unit's potential to emit. PM10 is assumed to be equivalent to PE.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency.
 - c. The general provisions specified under paragraphs (A)(2) to (A)(5) of the rule 3745-21-10 of the Ohio Administrative Code shall apply to the compliance testing.
 - d. The test method(s) and procedures of paragraph (C) of rule 3745-21-10 of the Administrative Code shall be followed, except as specified in OAC rule 3745-21-12(F)(2).

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. None