

Facility ID: 1431070730 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 P001](#)
[Go to Part II for Emissions Unit P003](#)
[Go to Part II for Emissions Unit P004](#)

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Facility ID: 1431070730 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
P001 - Bun line and oven	OAC rule 3745-31-05(A)(3) (PTI 14-05588)	Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hour from the process line and oven. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(C)(1), and OAC rule 3745-31-05(C).
	OAC rule 3745-31-02(A)(2)	The following mass emissions are from the products of combustion associated with the oven in this emissions unit: Particulate emissions (PE) shall not exceed 0.07 ton per year. Particulate matter with diameters of 10 microns or less (PM10) shall not exceed 0.07 ton per year. Sulfur dioxide (SO2) emissions shall not exceed 0.006 ton per year. Nitrogen oxides (NOx) emissions shall not exceed 0.92 ton per year. Carbon monoxide (CO) emissions shall not exceed 0.77 ton per year.
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 94 TPY based on a rolling, 12-month summation, for emissions units P001 and P003, combined.
	OAC rule 3745-17-07(A)(1)	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(C)(1)	Particulate Emissions (PE) shall not exceed 0.020 lb of particulate emissions/mmBtu.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the mass and visible emissions limitations.
The hourly emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain monthly records of the following information:
 - a. The amount of buns baked in tons.
 - b. The monthly VOC emission factor based on the equation listed below. These records shall list all variables stated in the emission factor equation given below, which shall be used to calculate the VOC emissions:

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

VOC emission factor = pounds of VOC per ton of baked buns
 Y_i = initial baker's percent of yeast to the nearest tenth of a %
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's percent of yeast to the nearest tenth of a %
 t_s = spiking time in hours to the nearest tenth of an hour.
 - c. The monthly VOC emissions, in tons.
 - d. The rolling, 12-month summation of the VOC emissions from this emissions unit, in tons.
 - e. The rolling, 12-month summation of the VOC emissions from emissions units P001 and P003 combined, in tons.
 2. 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.
- D. Reporting Requirements**
1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services that identify each month during which the VOC emission limit given in section A.1 was exceeded. If no exceedances occurred, the permittee shall state so in the report. If an exceedance occurs the permittee shall list, the cause of the exceedance, corrective action taken to prevent the exceedance in the future, and a summary of the rolling, 12-month summations for VOC emissions for each month. These semi-annual reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
 2. 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.
- E. Testing Requirements**
1. Emissions Limitation:
Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.
 2. Emissions Limitation:
VOC emissions shall not exceed 94 TPY based on a rolling, 12-month summation, for emissions units P001 and P003, combined.

Applicable Compliance Method:
Compliance with the TPY VOC emission limitations in section A.1 of this permit shall be determined by the record keeping requirements in section C.1.
 3. Emissions Limitations:
Particulate emissions (PE) shall not exceed 0.07 ton per year.

Particulate matter with diameters of 10 microns or less (PM10) shall not exceed 0.07 ton per year.

Sulfur dioxide (SO₂) emissions shall not exceed 0.006 ton per year.

Nitrogen oxides (NO_x) emissions shall not exceed 0.92 ton per year.

Carbon monoxide (CO) emissions shall not exceed 0.77 ton per year.

Applicable Compliance Method:
Compliance with PE/PM10, SO₂, NO_x, and CO emission limitations shall be determined using the emission factors from the 5th Edition of AP-42, Chapter 1.4 - Natural Gas Combustion.
 4. Operational Restriction:
The permittee shall burn only natural gas in this emissions unit.

Applicable Compliance Method:
Compliance with the operational restriction in section B.1 shall be determined by the record keeping requirements in section C.2.
- F. Miscellaneous Requirements**
1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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Facility ID: 1431070730 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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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>
P003 - Bread line and oven	OAC rule 3745-31-05(A)(3) (PTI 14-05588)	Not applicable, see section F.1.
	OAC rule 3745-31-02(A)(2)	The following mass emissions are from the products of combustion associated with the oven in this emissions unit: Particulate emissions (PE) shall not exceed 0.23 ton per year. Particulate matter with diameters of 10 microns or less (PM10) emissions shall not exceed 0.23 ton per year. Sulfur dioxide (SO2) emissions shall not exceed 0.018 ton per year. Nitrogen oxides (NOx) emissions shall not exceed 2.96 TPY. Carbon monoxide (CO) emissions shall not exceed 2.48 TPY.
	OAC rule 3745-17-07(A)(1)	VOC emissions shall not exceed 31 lbs per hour and 78.165 TPY from the process line and oven for emissions unit P003.
	OAC rule 3745-17-10(C)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-31-05(C)	Particulate Emissions (PE) shall not exceed 0.020 lb of particulate emissions/mmBtu. VOC emissions shall not exceed 94 TPY based on a rolling, 12-month summation, for emissions units P001 and P003, combined.

2. **Additional Terms and Conditions**
 - (a) The hourly emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The amount of bread baked in tons.
 - b. The monthly VOC emission factor based on the equation listed below. These records shall list all variables stated in the emission factor equation given below, which shall be used to calculate the VOC emissions:

VOC emission factor = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90

VOC emission factor = pounds of VOC per ton of baked bread
 Y_i = initial baker's percent of yeast to the nearest tenth of a %
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's percent of yeast to the nearest tenth of a %
 t_s = spiking time in hours to the nearest tenth of an hour.

- c. The monthly VOC emissions, in tons
 - d. The rolling, 12-month summation of the VOC emissions from this emissions unit, in tons.
 - e. The rolling, 12-month summation of the VOC emissions from emissions unit P001 and P003 combined, in tons.
2. 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.
- D. Reporting Requirements**
- 1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services that identify each month during which the VOC emissions limits given in section A.1 were exceeded. If no exceedances occurred, the permittee shall state so in the report. If an exceedance occurs the permittee shall list, the cause of the exceedance, corrective action taken to prevent the exceedance in the future, and a summary of the rolling, 12-month summations for VOC emissions for each month. These semi-annual reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
 - 2. 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.
- E. Testing Requirements**
- 1. Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.
 - 2. Emissions Limitation:
VOC emissions shall not exceed 94 TPY based on a rolling, 12-month summation, for emissions units P001 and P003, combined.

Applicable Compliance Method:
Compliance with the TPY VOC emission limitations in section A.1 of this permit shall be determined by the record keeping requirements in section C.1.
 - 3. Emissions Limitations:
Particulate emissions (PE) shall not exceed 0.07 ton per year.

Particulate matter with diameters of 10 microns or less (PM10) shall not exceed 0.07 ton per year.

Sulfur dioxide (SO₂) emissions shall not exceed 0.006 ton per year.

Nitrogen oxides (NO_x) emissions shall not exceed 0.92 ton per year.

Carbon monoxide (CO) emissions shall not exceed 0.77 ton per year.

Applicable Compliance Method:
Compliance with PE/PM10, SO₂, NO_x, and CO emission limitations shall be determined using the emission factors from the 5th Edition of AP-42, Chapter 1.4 - Natural Gas Combustion.
 - 4. Operational Restriction:
The permittee shall burn only natural gas in this emissions unit.

Applicable Compliance Method:
Compliance with the operational restriction in section B.1 shall be determined by the record keeping requirements in section C.2.
 - 5. Emissions Limitations:
VOC emissions shall not exceed 31 lbs per hour and 78.165 TPY from the process line and oven for emissions unit P003.

Applicable Compliance Method:
The hourly emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.

Compliance with the annual VOC emission limitation shall be determined by the record keeping requirements in section C.1.
- F. Miscellaneous Requirements**
- 1. The permittee submitted a Permit to Operate application for this emissions unit while bakery ovens were still exempt from the requirement to obtain a Permit to Install. Since the unit was exempt from the requirement to obtain a Permit to Install, Best Available Technology is not required to be met.
 - 2. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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Facility ID: 1431070730 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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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>
P004 - Lubrication of bakery oven chains	OAC rule 3745-31-02(A)(2) (PTI 14-05588)	VOC emissions shall not exceed 120 lbs/week and 3.12 TPY. See terms A.2.a, A.2.b, and B.1.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each oven chain lubricant employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied. The weekly emissions limitation is based on the emissions unit's potential to emit. Therefore, no weekly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The maximum annual chain lubricant usage for this emissions unit shall not exceed 1040 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The name and identification number of each oven chain lubricant employed.
 - b. The volume, in gallons, of each oven chain lubricant employed.
 - c. The total volume, in gallons, of all oven chain lubricants employed.
 - d. The VOC content of each oven chain lubricant, in pounds per gallon, as applied.
 - e. The total VOC emission rate for all oven chain lubricants employed, in pounds per month (b x d).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that emissions unit P004 employed oven chain lubricants that exceeded the applicable maximum VOC content limitation outlined in term A.2.a. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the end of the month in which the exceedance(s) occurred. For each VOC content limitation exceedance, the permittee shall also identify if an exceedance of the applicable VOC emissions limitation occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that emissions unit P004 employed oven chain lubricants that exceeded the applicable maximum oven chain lubricants usage limitation outlined in term B.1. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the end of the month in which the exceedance(s) occurred. For each usage limitation exceedance, the permittee shall also identify if an exceedance of the applicable VOC emissions limitations occurred.

E. Testing Requirements

1. Compliance with the emission limitations and VOC content limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations
VOC emissions shall not exceed 120 lbs/week.

Applicable Compliance Method:

Compliance can be demonstrated by multiplying the maximum VOC content limit for coatings identified in term A.2.a, 6.0 lbs/gal, by the maximum coating application rate, 1040 gallons/year and then dividing this number by 52 weeks/year.

b. Emission Limitation:

VOC emissions shall not exceed 3.12 TPY.

Applicable Compliance Method:

Compliance with the above emission limitation may be demonstrated by summing the VOC emissions in lbs/month required pursuant to term C.1.e. and then dividing this number by 2000 lb/ton.

c. Emission Limitations:

The volatile organic compound (VOC) content of each oven chain lubricant employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the inks and coatings.

2. Compliance with the oven chain lubricant usage limitation in Section B.1 of these terms and conditions shall be determined by the record keeping requirements as specified in term C.1.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.