

Facility ID: 1652000060 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.

- (a) None
- B. **Operational Restrictions**
- 1. None
- C. **Monitoring and/or Record Keeping Requirements**
- 1. The permittee shall perform daily inspections, when the emissions unit is in operation, for any abnormal visible particulate emissions from any portion (operation) of this emissions unit. The presence of abnormal visible emissions shall be noted in a daily operations log, and include the following:
 - a. date(s) and identification of the operation(s) with the abnormal particulate emissions;
 - b. color of the abnormal emissions;
 - c. cause of the abnormal emissions;
 - d. total duration of the abnormal emission incident; and
 - e. any corrective actions, including corresponding dates, taken to eliminate the abnormal visible emissions;
 - f. date and reason any necessary corrective action was not performed; and
 - g. date and reason any inspection was not performed, as required above.
- 2. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned daily inspection frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- D. **Reporting Requirements**
- 1. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency;
 - b. each instance when a corrective action, that was to be performed as a result of an inspection, was not implemented; and
 - c. each day during which abnormal visible particulate emissions were observed from this emissions unit, and all corrective actions taken to eliminate the abnormal visible particulate emissions.
- 2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
- E. **Testing Requirements**
- 1. Compliance with the visible emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation: 20% opacity from fugitive emissions, as a 3-minute average

Applicable Compliance Method: OAC rule 3745-17-03(B)(3).
- F. **Miscellaneous Requirements**
- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

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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>
Unpaved roadway with truck turn around/parking area (see Section A.2.a)	OAC rule 3745-17-07 (B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period

OAC rule 3745-17-08 (B), (B)(2) reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g)

2. Additional Terms and Conditions

- (a) The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

unpaved roadways:

Main Drive; and

Shipping Segment

unpaved parking areas:

Turnaround/Parking

The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

unpaved roadways and parking areas minimum inspection frequency

all daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
 2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
- E. Testing Requirements**
1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 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, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.
- 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>
Rotary dryer (with drop-out box and process cyclone) 6 TPH process weight rate design capacity, 3.3 mmBtu/hr heat input capacity (natural gas-fired) used to dehydrate ground baked bread & buns from F001 (Bread Grinder)	OAC rule 3745-17-07(A)	20% opacity from stack emissions, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-07(B)	20% opacity from fugitive emissions, as a 3-minute average
	OAC rule 3745-17-08(B)	All material transfers shall utilize low drop heights, as appropriate, and occur within an effective enclosure system that minimizes emissions of fugitive dust to the extent possible with good engineering design and work practices.
	OAC rule 3745-17-11(B)	5.61 lbs/hr PE (based upon FIGURE II and an uncontrolled mass rate of emission of 33.8 lbs/hr)

2. **Additional Terms and Conditions**
 - (a) The 5.61 lbs/hr PE limit regulated per OAC rule 3745-17-11(B) is greater than the potential to emit for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with this emissions limit.

However, if any proposed change(s), such as with production capacity, process materials, method of operation, etc., or anything else that increase(s) the potential to emit PE beyond the allowable PE limit, or increases the potential to emit any other pollutant, then the permittee shall apply for and obtain a final permit to install prior to the change(s).
Based on application data, only solid organic materials are employed in this emissions unit.

B. Operational Restrictions

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

2. The permittee shall limit the amount of raw (unbaked) leavened dough to no more than 5% (by weight) of the total material (leavened and unleavened) processed in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records indicating the raw leavened dough weight percentage of the total material processed in this emissions unit.
3. The permittee shall perform daily inspections, when the emissions unit is in operation, for any abnormal visible particulate emissions from this emissions unit. The presence of abnormal visible emissions shall be noted in a daily operations log, and include the following:
 - a. date(s) and identification of the operation(s) with the abnormal particulate emissions;
 - b. color of the abnormal emissions;
 - c. cause of the abnormal emissions;
 - d. total duration of the abnormal emission incident; and
 - e. any corrective actions, including corresponding dates, taken to eliminate the abnormal visible emissions;
 - f. date and reason any necessary corrective action was not performed; and
 - g. date and reason any inspection was not performed, as required above.
4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned daily inspection frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
2. The permittee shall submit deviation (excursion) reports that identify each day when the raw leavened dough weight percentage exceeded 5% of the total material processed in this emissions unit.
3. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency;
 - b. each instance when a corrective action, that was to be performed as a result of an inspection, was not implemented; and
 - c. each day during which abnormal visible particulate emissions were observed from this emissions unit, and all corrective actions taken to eliminate the abnormal visible particulate emissions.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 Emission Limitation: 20% opacity from stack emissions, as a 6-minute average

 Applicable Compliance Method: OAC rule 3745-17-03(B)(1).
 Emission Limitation: 20% opacity from fugitive emissions, as a 3-minute average

 Applicable Compliance Method: OAC rule 3745-17-03(B)(3).
 Emission Limitation: 5.61 lbs/hr PE

 Applicable Compliance Method: The above emissions limitation is greater than the potential to emit for this emissions unit, as established in the equation below:

$$H = EP,$$
 where:

$$H = 2.4 \text{ lbs/hr particulate emissions [hourly potential to emit];}$$

$$E = 0.40 \text{ lb particulate emissions/ton material processed [emissions factor, based upon emissions data from Bakery Feeds, Inc.- Marshville, NC facility, a similar operation]; and}$$

$$P = 6 \text{ TPH [process weight rate design capacity].}$$
2. If necessary, the permittee may need to perform emissions testing using appropriate USEPA approved test methods to establish site-specific emissions data for this emissions unit.

F. Miscellaneous Requirements

1. None