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Facility Name: **VIP Products**

Application Number: **14-4607**

Date: **January 21, 1999**

### **GENERAL PERMIT CONDITIONS**

#### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

#### **CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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### **BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **VIP Products** located in **Hamilton** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P001 Modi- fi-cati on	Upper level bakery oven	Emission limitation and compliance with Ohio's Air Toxics Policy	3745-15-07 3745-21-07* 3745-31-05	See Term F.1. Less stringent than BAT 4.37 pounds/hour and 15.68 TPY OC
P002 Modi- fi-cati on	Lower level bakery oven	Emission limitation and compliance with Ohio's Air Toxics Policy	3745-15-07 3745-21-07* 3745-31-05	See Term F.1. Less stringent than BAT 4.43 pounds/hour and 15.89 TPY OC

\* The emission limitation established by this rule is less stringent than those established by OAC rule 3745-31-05.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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## SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	31.57

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### **REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

### **WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **A. Applicable Emission Limitations and/or Control Requirements**

1. The emissions of Organic Compounds from emissions unit P001 shall not exceed 4.37 pounds per hour and 15.68 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

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2. The emissions of Organic Compounds from emissions unit P002 shall not exceed 4.43 pounds per hour and 15.89 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
3. The hourly emission limitations outlined are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C) (5) is prohibited.

**C. Monitoring and Recordkeeping Requirements**

1. The permittee shall maintain monthly records which summarize the OC emissions from P001 and P002 during the previous calendar month. The following equation taken from Alternative Control Technology Document for Bakery Oven Emission, EPA 453/R-92-017, December 1992 shall be used to calculate the OC emissions from the ovens:

$$\text{OC Emission Factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.9$$

Where,

OC EF = pounds of organic compounds per ton of bread baked;

$Y_i$  = initial baker's percent of yeast to the nearest tenth of a percent;

$t_i$  = 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 percent; and

$t_s$  = spiking time in hours to the nearest tenth of an hour.

2. The permittee shall maintain monthly records of the rolling, 12-month summation of the OC emissions.

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3. Each record and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, copies of all reports required by this permit. Such records may be maintained in computerized form.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports to the Hamilton County Dept. of Env. Services which the OC emissions from emissions units P001 and P002 during each calendar month of the quarter, and the updated rolling, 12-month total of OC emissions.
2. The permittee shall submit required reports in the following manner:
  - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Dept. of Env. Services; and,
  - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventative measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Env. Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

**E. Compliance Methods/Testing Requirements**

1. Compliance with the emission limitations in Section A of these terms and conditions shall be demonstrated by

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the recordkeeping requirements in Term and Condition C.1 and C.2.

**F. Miscellaneous Requirements**

1. If probable cause exists indicating that these emissions units are causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions units shall be required to submit and implement a control program which will bring the emissions units into compliance.
2. This PTI is a modification to PTI 14-4179. Upon issuance, the terms and conditions of this PTI will supersede PTI 14-4179.
3. This permit allows the use of materials specified by the permittee in the application for PTI number 14-4607. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

**Pollutant: Ethanol**

**TLV (ug/m3): 1,880,000**

**Maximum Hourly Emission Rate (lbs/hr): 8.8**

**Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 9781**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,762**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such,

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prior notification to and approval from the Hamilton County Dept. of Env. Services are required, including the possible issuance of modifications to PTI number 14-4607 and the operating permit:

- a. any changes in the materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).