



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

1/20/2009

RICK WILSON
SCHWEBEL BAKING CO #1
PO BOX 6018
YOUNGSTOWN, OH 44501

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318538152
Permit Number: P0104212
Permit Type: Initial Installation
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate 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 comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. 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
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

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 in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate 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 and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
CDAQ; Pennsylvania; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Baker Perkins 970 Oven, #54198 – 5.1 mmBtu/hr Bun baking oven

3. Facility Emissions and Attainment Status:

Facility Emissions reported as 0-10 tons for the years 2004-2005

Facility allowable for P002 and P003 combined is 41.0 TPY as a 12-month rolling limit (excluding the products of combustion), the actual emissions are estimated to be 17.39 TPY (excluding the products of combustion).

Cuyahoga County is non-attainment for ozone and PM 2.5

4. Source Emissions:

P003 is limited to 10.52 lbs/hour (excluding products of combustion)

There is no individual yearly limit for P003, see Question #3.

5. Conclusion:

Schwebel Baking Co. should stay below Title V thresholds as long as they adhere to their terms and conditions for P002 and P003. Monthly record keeping of VOC emissions based on bread and buns baked is required.

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>
VOC (from bread baking P002/P003)	41.0
OC (from products of combustion)	0.26
NOx	2.19
CO	1.84
PE	0.09

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
SCHWEBEL BAKING CO #1

Issue Date: 1/20/2009
Permit Number: P0104212
Permit Type: Initial Installation
Permit Description: Initial installation
Facility ID: 1318538152
Facility Location: SCHWEBEL BAKING CO #1
6250 CAMP INDUSTRIAL RD,
SOLON, OH 44139
Facility Description: All Other Industrial Machinery Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erievue Plaza or (216)664-2297. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
SCHWEBEL BAKING CO #1**

Facility ID: 1318538152
Permit Number: P0104212
Permit Type: Initial Installation
Issued: 1/20/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
SCHWEBEL BAKING CO #1

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104212

Facility ID: 1318538152

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318538152
Application Number(s): A0036556
Permit Number: P0104212
Permit Description: Initial installation
Permit Type: Initial Installation
Permit Fee: \$1,000.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 1/20/2009
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:

SCHWEBEL BAKING CO #1
6250 CAMP INDUSTRIAL RD
SOLON, OH 44139

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104212

Facility ID: 1318538152

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104212
Permit Description: Initial installation

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

Emissions Unit ID:	P003
Company Equipment ID:	Baker/Perkins #54198
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104212

Facility ID: 1318538152

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 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 Cleveland Division of Air Quality 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104212

Facility ID: 1318538152

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104212

Facility ID: 1318538152

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104212

Facility ID: 1318538152

Effective Date: To be entered upon final issuance

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) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104212

Facility ID: 1318538152

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P003, Oven #54198

Operations, Property and/or Equipment Description:

Baker Perkins 970 Oven, #54198
The emissions unit was installed in March, 2001

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. b)(1)f., c(2), c(3), d)(2), e)(1), and f)(10)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	VOC emissions shall not exceed 10.52 lbs/hour from bread baking OC emissions shall not exceed 0.06 lb/hour and 0.26 tons/year from the 5.1 mmBtu/hour natural gas-fired burner NOx emissions shall not exceed 0.50 lb/hour and 2.19 tons/year from the 5.1 mmBtu/hour natural gas-fired burner CO emissions shall not exceed 0.42 lb/hour and 1.84 tons/year from the 5.1 mmBtu/hour natural gas-fired burner Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(A)	The visible emission limitation specified



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3)
c.	OAC rule 3745-17-10(B)(1)	0.020 lbs of particulate emissions per mmBtu of actual heat input.
d.	OAC rule 3745-18-06	Exempt. See c)(1).
e.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V	The combined annual VOC emissions from P002 and P003 shall not exceed 41.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

(2) The permittee shall determine the emission factor (EF) established by the following equation for VOC emissions for each different recipe used in bread and bun baking operations taken from AP-42, Volume 1, Fifth Edition (January, 1995), section 9.9.6 "Bread Baking":

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast

t_s = spiking time in hours

The total combined bread and buns produced in P002 and P003 shall be restricted on a rolling, 12-month summation using the following equation:

n

$$\sum_{i=1}^n [\text{EF VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds/ton}) + X$$

41.0 tons VOC/rolling 12-month period

Where

i = each different recipe used in baking operations

X = total VOC emissions for the past 11 months



The total combined emissions of VOC from P002 and P003 shall not exceed 41.0 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

- (3) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons) (Combined P002 and P003)
1	6.0
1-2	11.0
1-3	14.5
1-4	18.0
1-5	21.0
1-6	24.0
1-7	27.0
1-8	30.0
1-9	33.0
1-10	36.0
1-11	39.0
1-12	41.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual bread production and VOC emission limitation shall be based upon a rolling, 12-month summation of the bread production and VOC emissions.

d) Monitoring and/or Recordkeeping 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 monthly records of the following information for P002 and P003 combined:
 - a. the name and identification of each recipe produced;



- b. the total amount of baked goods produced per recipe, in tons per month;
 - c. the emission factor for each recipe as calculated in Section c)(2);
 - d. the total monthly VOC emissions, in tons, for each recipe by summing [(b. x c.)/2,000] for all recipes produced in accordance with c)(2) above; and
 - e. the rolling 12-month summation of total VOC emission, in tons.
- (3) 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 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 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 emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (4) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- e) Reporting Requirements
- (1) 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:



- i. all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emissions levels shown in c)(2).
- 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.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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 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.

f) Testing Requirements

- (1) Emission Limitation:
10.52 lbs/hr of VOC from bread baking

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor established by the equation for VOC emissions from bread baking operations was taken from AP-42, Volume 1, Fifth Edition (January, 1995), section 9.9.6, "Bread Baking" by the amount of bread produced, in tons. This is shown below in a one time calculation of Potential-to-Emit for the worst case recipe at the maximum production rate:

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

Where

VOC EF = pounds of VOC per ton of baked bread

Y_i = initial baker's percentage of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percentage of yeast



ts = spiking time in hours

$$\text{VOC EF} = 0.95(2.5\%) + 0.195(2.50) - 0.51(0\%) - 0.86(0\%) + 1.90$$
$$= 4.76 \text{ pounds VOC/ton baked bread}$$

$$(4.76 \text{ pounds VOC/ton baked bread}) \times (2.21 \text{ tons baked bread/hour}) = 10.52 \text{ pounds VOC/hour}$$

- (2) Emission Limitation:
0.06 lb/hour of OC emissions from the 5.1 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor from Section 1.4 (“Natural Gas Consumption”) of AP-42, Fifth Edition, Volume 1, Chapter 1 by the mmBtu/hour rating of the natural gas-fired burner. Since the emissions factor is given in a volume format, it was converted to an energy basis by dividing the given factor by 1,020 mmBtu/10⁶ scf.

- (3) Emission Limitation:
0.26 tons/year of OC from the 5.1 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- (4) Emission Limitation:
0.50 lbs/hour of NOx emissions from the 5.1 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor from Section 1.4 (“Natural Gas Consumption”) of AP-42, Fifth Edition, Volume 1, Chapter 1 by the mmBtu/hour rating of the natural gas-fired burner. Since the emissions factor is given in a volume format, it was converted to an energy basis by dividing the given factor by 1,020 mmBtu/10⁶ scf

- (5) Emission Limitation:
2.19 tons/year of NOx emissions from the 5.1 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- (6) Emission Limitation:
0.42 lbs/hour of CO emissions from the 5.1 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor from Section 1.4 (“Natural Gas Consumption”) of AP-42, Fifth Edition,



Volume 1, Chapter 1 by the mmBtu/hour rating of the natural gas-fired burner. Since the emissions factor is given in a volume format, it was converted to an energy basis by dividing the given factor by 1,020 mmBtu/10⁶ scf

- (7) Emission Limitation:
1.84 tons/year of CO emissions from the 5.1 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- (8) Emission Limitation:
Visible particulate emissions from any stack shall not exceed 5% 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 U.S. EPA Method 9.

- (9) Emission Limitation:
0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the pound per mmBtu emissions limit shall be shown by dividing the emission factor from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1 by 1,020 mmBtu/10⁶ scf.

- (10) Emission Limitation:
The combined annual VOC emissions for P002 and P003 shall not exceed 41.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping from d)(2) and the following:

n

$$\sum_{i=1}^n [EF \text{ VOC}_i \times (\text{tons product}_i/\text{month})] / (2,000 \text{ pounds}/\text{ton}) = \text{tons VOC}/\text{month}$$

Where

i = each different recipe used in baking operations

The permittee shall then sum the total monthly VOC emissions as a rolling, 12-month summation.

- g) Miscellaneous Requirements

- (1) None.