



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

8/30/2012

Michael Mahon  
NEW YORK FROZEN FOODS  
25900 Fargo Ave.  
Bedford Heights, OH 44146

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318047969  
Permit Number: P0109586  
Permit Type: Renewal  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) 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 public 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 can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. 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
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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 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 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, Manager  
Permit Issuance and Data Management Section, DAPC

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





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (FEPTIO to avoid Title V)

Netting Determination

2. Source Description:

The New York Frozen Foods company has submitted an application for a Federally Enforceable Permit to Install and Operate (FEPTIO) permit. The operations covered by this permit application are three (3) direct natural gas fired tunnel bread baking ovens rated at 3.36, 6.2 and 7.0 mmBtu/hr.

3. Facility Emissions and Attainment Status:

This facility currently has the potential to emit (PTE) VOC emissions in excess of 100 TPY which would result in Title V applicability. Cuyahoga County is currently in non-attainment for PM 2.5.

4. Source Emissions:

The sources (P004 – P006) have the potential to emit 182.0 TPY of VOC emissions resulting in Title V permitting. The PTE is based on the allowable limit for each emissions unit established in PTI #13-04559. However, the company has requested a Federally Enforceable Permit to Install and Operate (FEPTIO) in order to avoid Title V. The facility has accepted an annual combined VOC emissions limitation from P004 –P006 of 91.0 TPY as a rolling 12-month summation of the VOC emissions.

5. Conclusion:

Limiting the annual combined VOC emissions from P004 – P006 to 91.0 TPY based on a rolling, 12-month summation of the VOC emissions, will not subject the New York Frozen Food company to Title V permitting.

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>
<u>VOC</u>	<u>91.0</u>
<u>NOx</u>	<u>7.14</u>
<u>CO</u>	<u>5.96</u>



PUBLIC NOTICE

8/30/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

NEW YORK FROZEN FOODS

25900 FARGO AVE.,

BEDFORD HTS., OH 44146

Cuyahoga County

FACILITY DESC.: Frozen Specialty Food Manufacturing

PERMIT #: P0109586

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for three (3) direct natural gas-fired tunnel bread baking ovens rated at 3.36, 6.2 and 7.0 mmBtu/hr.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
NEW YORK FROZEN FOODS**

Facility ID:	1318047969
Permit Number:	P0109586
Permit Type:	Renewal
Issued:	8/30/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
NEW YORK FROZEN FOODS

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## Authorization

Facility ID: 1318047969

Application Number(s): A0043794

Permit Number: P0109586

Permit Description: FEPTIO renewal permit for three (3) direct natural gas-fired tunnel bread baking ovens rated at 3.36, 6.2 and 7.0 mmBtu/hr.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 8/30/2012

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:

NEW YORK FROZEN FOODS  
25900 FARGO AVE.  
BEDFORD HTS., OH 44146

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 Erievue 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

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0109586

Permit Description: FEPTIO renewal permit for three (3) direct natural gas-fired tunnel bread baking ovens rated at 3.36, 6.2 and 7.0 mmBtu/hr.

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

<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Bread Baking Oven #4
Superseded Permit Number:	P0095139
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Bread Baking Oven #5
Superseded Permit Number:	P0095139
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Bread Baking Oven #6
Superseded Permit Number:	P0095139
General Permit Category and Type:	Not Applicable



## **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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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<sup>1</sup> 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 emissions 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.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**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.

**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.

## **B. Facility-Wide Terms and Conditions**

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.

## **C. Emissions Unit Terms and Conditions**



1. P004, Bread Baking Oven #4

Operations, Property and/or Equipment Description:

3.36 mmBtu/hour direct natural gas-fired tunnel oven No. 4

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. d)(3)

(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), d)(2), e)(2) and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)  (PTI 13-04559 issued on March 16, 2006)	<p>Volatile organic compounds (VOC) emissions shall not exceed 9.42 lbs/hour and 41.27 tons/year.</p> <p>Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 0.33 lb/hour and 1.45 tons/year from the combustion of natural gas.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.28 lb/hour and 1.23 tons/year from the combustion of natural gas.</p> <p>See b)(2)a. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D)(1)(b).
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(A)	Exempt. See c)(1) below.
e.	OAC rule 3745-21-07(M)	See b)(2)b. below.
f.	OAC rule 3745-31-05(D)(1)(b)  FEPTIO to avoid Title V	The combined annual VOC emissions from P004, P005, and P006 shall not exceed 91.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

- a. The hourly and annual emission limits for this emissions unit have been established at the unit's potential to emit; therefore, monitoring, recordkeeping, and reporting are not needed for these limits.
- b. No liquid organic materials are employed in this emissions unit; therefore, OAC rule 3745-21-07(M) is not applicable.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas as fuel in this emissions unit.
- (2) The permittee shall determine the emission factor (E.F.) established by the following equation for VOC emissions for each different recipe used in bread baking operations taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6, "Bread Baking" for each recipe:

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

Where

VOC E.F. = 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 produced in P004, P005, and P006 shall be restricted on a rolling, 12-month summation.

The permittee shall calculate and sum the VOC emissions from each different recipe used in baking operations for the month and then add the total VOC emissions from the previous 11 months as shown below:

$$[\text{E.F. VOC}_i \times (\text{tons product/month})] / (2,000 \text{ pounds/ton}) + X$$

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 P004, P005, and P006 shall not exceed 91.0 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

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 P004, P005, and P006 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 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); and
  - e. the rolling 12-month summation of total VOC emissions, in tons.

- (3) The permit to install for this emissions unit P004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m<sup>3</sup>): 1,880

Maximum Hourly Emission Rate (lbs/hour): 41.53 (combined total for P004 - P006)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 37,860

MAGLC (ug/m<sup>3</sup>): 44,762

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a compound with the 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 previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ 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 combined rolling, 12-month emission limitation for VOC 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

## f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 9.42 lbs/hour.

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 (February, 1997), 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:

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

Where

VOC E.F. = 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

$$\begin{aligned} \text{VOC E.F.} &= 0.95(5.1\%) + 0.195(1.2) - 0.51(0\%) - 0.86(0\%) + 1.90 \\ &= 6.98 \text{ pounds VOC/ton baked bread} \end{aligned}$$

$$(6.98 \text{ pounds VOC/ton baked bread}) \times (1.35 \text{ tons baked bread/hour}) = 9.42 \text{ pounds VOC/hour}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method(s) 25 or 25A of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 41.27 tons/year.

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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the requirements specified in OAC rule 3745-17-03(B)(1) and the methods and procedures required in 40 CFR Part 60, Appendix A, Method 9. This compliance method shall be used whenever a compliance determination is warranted.

d. Emission Limitation:

The combined annual VOC emissions for P004, P005, and P006 shall not exceed 91.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:

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

The permittee shall calculate and sum the VOC emissions from each different recipe used in baking operations for the month, as follows:

$$[E.F. \text{ VOC}_i \times (\text{tons product/month})] / (2,000 \text{ pounds/ton}) = \text{tons VOC/month}$$

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.

e. Emission Limitation:

NOx emissions shall not exceed 0.33 lb/hr from the 3.36 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor of 100 lbsNOx/mmscf 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, they were converted to an energy basis by dividing the given factor by 1,020 mmBtu/mmscf.

f. Emission Limitation:

NOx emissions shall not exceed 1.45 tons/year from the 3.36 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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

- g. Emission Limitation:  
CO emissions shall not exceed 0.28 lb/hr from the 3.36 mmBtu/hour natural gas-fired burner

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor of 84 lbs CO/mmscf 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, they were converted to an energy basis by dividing the given factor by 1,020 mmBtu/mmscf.

- h. Emission Limitation:  
CO emissions shall not exceed 1.23 tons/year from the 3.36 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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.



2. P005, Bread Baking Oven #5

Operations, Property and/or Equipment Description:

6.2 mmBtu/hour direct natural gas-fired tunnel oven No. 5

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. d)(3)

(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), d)(2), e)(2) and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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) (Permit-to-Install No. 13-04559 issued on 3/16/2006)	<p>Volatile organic compounds (VOC) emissions shall not exceed 13.96 lb/hour and 61.14 tons/year.</p> <p>Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 0.61 lb/hour and 2.67 tons/year from the combustion of natural gas.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.51 lb/hour and 2.23 tons/year from the combustion of natural gas.</p> <p>See b)(2)a. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D)(1)(b).
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(A)	Exempt. See c)(1) below.
e.	OAC rule 3745-21-07(M)	See b)(2)b. below.
f.	OAC rule 3745-31-05(D)(1)(b)  FEPTIO to avoid Title V	The combined annual VOC emissions from P004, P005, and P006 shall not exceed 91.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

- a. The hourly and annual emission limits for this emissions unit have been established at the unit's potential to emit; therefore, monitoring, recordkeeping, and reporting are not needed for these limits.
- b. No liquid organic materials are employed in this emissions unit; therefore, OAC rule 3745-21-07(M) is not applicable.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas as fuel in this emissions unit.
- (2) The permittee shall determine the emission factor (E.F.) established by the following equation for VOC emissions for each different recipe used in bread baking operations taken from AP-42, Volume 1, Fifth Edition (February 1997), section 9.9.6, "Bread Baking" for each recipe:

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

Where

VOC E.F. = 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 produced in P004, P005, and P006 shall be restricted on a rolling, 12-month summation.

The permittee shall calculate and sum the VOC emissions from each different recipe used in baking operations for the month and then add the total VOC emissions from the previous 11 months as shown below:

$$[\text{E.F. VOC}_i \times (\text{tons product/month})] / (2,000 \text{ pounds/ton}) + X$$

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 P004, P005, and P006 shall not exceed 91.0 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

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 P004, P005, and P006 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 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); and
  - e. the rolling 12-month summation of total VOC emissions, in tons.

- (3) The permit to install for this emissions unit P005 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m<sup>3</sup>): 1,880

Maximum Hourly Emission Rate (lbs/hour): 41.53 (combined total for P004 - P006)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 37,860

MAGLC (ug/m<sup>3</sup>): 44,762

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a compound with the 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 previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ 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 combined rolling, 12-month emission limitation for VOC 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

## f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 13.96 lbs/hr.

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 (February 1997), 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:

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

Where

VOC E.F. = 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

$$\begin{aligned} \text{VOC E.F.} &= 0.95(5.1\%) + 0.195(1.2) - 0.51(0\%) - 0.86(0\%) + 1.90 \\ &= 6.98 \text{ pounds VOC/ton baked bread} \end{aligned}$$

$$(6.98 \text{ pounds VOC/ton baked bread}) \times (2.0 \text{ tons baked bread/hour}) = 13.96 \text{ pounds VOC/hour}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method(s) 25 or 25A of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 61.14 tons/year.

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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the requirements specified in OAC rule 3745-17-03(B)(1) and the methods and procedures required in 40 CFR Part 60, Appendix A, Method 9. This compliance method shall be used whenever a compliance determination is warranted.

d. Emission Limitation:

The combined annual VOC emissions for P004, P005, and P006 shall not exceed 91.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:

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

The permittee shall calculate and sum the VOC emissions from each different recipe used in baking operations for the month, as follows:

$$[E.F. \text{ VOC}_i \times (\text{tons product/month})] / (2,000 \text{ pounds/ton}) = \text{tons VOC/month}$$

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.

e. Emission Limitation:

NOx emissions shall not exceed 0.61 lb/hr from the 6.2 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor of 100 lbsNOx/mmscf 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, they were converted to an energy basis by dividing the given factor by 1,020 mmBtu/mmscf.

f. Emission Limitation:

NOx emissions shall not exceed 2.67 tons/year from the 6.2 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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

CO emissions shall not exceed 0.51 lb/hr from the 6.2 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor of 84 lbs CO/mmscf 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, they were converted to an energy basis by dividing the given factor by 1,020 mmBtu/mmscf.

h. Emission Limitation:

CO emissions shall not exceed 2.23 tons/year from the 6.2 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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.



3. P006, Bread Baking Oven #6

Operations, Property and/or Equipment Description:

7.0 mmBtu/hour direct natural gas-fired tunnel oven No. 6

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. d)(3)

(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), d)(2), e)(2) and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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) (Permit-to-Install No. 13-04559 issued on 3/16/2006)	<p>Volatile organic compounds (VOC) emissions shall not exceed 18.15 lbs/hour and 79.48 tons/year.</p> <p>Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 0.69 lb/hour and 3.02 tons/year from the combustion of natural gas.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.57 lb/hour and 2.50 tons/year from the combustion of natural gas.</p> <p>See b)(2)a. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D)(1)(b).
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(A)	Exempt. See c)(1) below.
e.	OAC rule 3745-21-07(M)	See b)(2)b. below.
f.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	The combined annual VOC emissions from P004, P005, and P006 shall not exceed 91.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

(2) Additional Terms and Conditions

- a. The hourly and annual emission limits for this emissions unit have been established at the unit's potential to emit; therefore, monitoring, recordkeeping, and reporting are not needed for these limits.
- b. No liquid organic materials are employed in this emissions unit; therefore, OAC rule 3745-21-07(M) is not applicable.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas as fuel in this emissions unit.
- (2) The permittee shall determine the emission factor (E.F.) established by the following equation for VOC emissions for each different recipe used in bread baking operations taken from AP-42, Volume 1, Fifth Edition (February, 1997), section 9.9.6, "Bread Baking" for each recipe:

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

Where

VOC E.F. = 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 produced in P004, P005, and P006 shall be restricted on a rolling, 12-month summation.

The permittee shall calculate and sum the VOC emissions from each different recipe used in baking operations for the month and then add the total VOC emissions from the previous 11 months as shown below:

$$[\text{E.F. VOC}_i \times (\text{tons product/month})] / (2,000 \text{ pounds/ton}) + X$$

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 P004, P005, and P006 shall not exceed 91.0 tons per year, based upon a rolling, 12-month summation of the VOC emissions using the above formula.

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 P004, P005, and P006 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 c)(2);
  - d. the total monthly VOC emissions, in tons, for each recipe by summing  $[(b. \times c.) / 2,000]$  for all recipes produced in accordance with c)(2); and
  - e. the rolling 12-month summation of total VOC emissions, in tons.

- (3) The permit to install for this emissions unit P006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m<sup>3</sup>): 1,880

Maximum Hourly Emission Rate (lbs/hour): 41.53 (combined total for P004 - P006)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 37,860

MAGLC (ug/m<sup>3</sup>): 44,762

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a compound with the 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 previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ 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 combined rolling, 12-month emission limitation for VOC 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

## f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 18.15 lbs/hr.

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 (February, 1997), 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:

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

Where

VOC E.F. = 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

$$\begin{aligned} \text{VOC E.F.} &= 0.95(5.1\%) + 0.195(1.2) - 0.51(0\%) - 0.86(0\%) + 1.90 \\ &= 6.98 \text{ pounds VOC/ton baked bread} \end{aligned}$$

$$(6.98 \text{ pounds VOC/ton baked bread}) \times (2.60 \text{ tons baked bread/hour}) = 18.15 \text{ pounds VOC/hour}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method(s) 25 or 25A of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 79.48 tons/year.

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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the requirements specified in OAC rule 3745-17-03(B)(1) and the methods and procedures required in 40 CFR Part 60, Appendix A, Method 9. This compliance method shall be used whenever a compliance determination is warranted.

d. Emission Limitation:

The combined annual VOC emissions for P004, P005, and P006 shall not exceed 91.0 tons/year as a rolling, 12-month summation (excluding products of combustion).

Applicable Compliance Method:

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

The permittee shall calculate and sum the VOC emissions from each different recipe used in baking operations for the month, as follows:

$$[E.F. \text{ VOC}_i \times (\text{tons product/month})] / (2,000 \text{ pounds/ton}) = \text{tons VOC/month}$$

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.

e. Emission Limitation:

NOx emissions shall not exceed 0.69 lb/hr from the 7.0 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor of 100 lbsNOx/mmscf 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, they were converted to an energy basis by dividing the given factor by 1,020 mmBtu/mmscf.

f. Emission Limitation:

NOx emissions shall not exceed 3.02 tons/year from the 7.0 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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

- g. Emission Limitation:  
CO emissions shall not exceed 0.57 lb/hr from the 7.0 mmBtu/hour natural gas-fired burner.

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the emission factor of 84 lbs CO/mmscf 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, they were converted to an energy basis by dividing the given factor by 1,020 mmBtu/mmscf.

- h. Emission Limitation:  
CO emissions shall not exceed 2.50 tons/year from the 7.0 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, provided compliance with the hourly emission limitation is shown, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.