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

11/21/2012

Certified Mail

Chip Klosterman
Klosterman Hearth Grain Bakery LLC
4760 Paddock Road
Cincinnati, OH 45229

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483140455
Permit Number: P0110403
Permit Type: OAC Chapter 3745-31 Modification
County: Warren

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: SWOAQA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Klosterman Hearth Grain Bakery LLC

Facility ID:	1483140455
Permit Number:	P0110403
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	11/21/2012
Effective:	11/21/2012
Expiration:	11/21/2017

Division of Air Pollution Control
Permit-to-Install and Operate
for
Klosterman Hearth Grain Bakery LLC

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. P001, Pulver tunnel oven 11
2. P002, Babb Oven 16

Authorization

Facility ID:	1483140455
Application Number(s):	A0045063, A0045486, A0045500
Permit Number:	P0110403
Permit Description:	Chapter 31 Modifcation for one (1) Pulver tunnel oven and one (1) Babbco tunnel oven at a yeast-leavened bakery operation for an increase in yeast percantage and to incorporate Synthetic Minor restrictions for VOC emissions to avoid Title V and RACT requirements.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$2,000.00
Issue Date:	11/21/2012
Effective Date:	11/21/2012
Expiration Date:	11/21/2017

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Klosterman Hearth Grain Bakery LLC
350 S. Pioneer Blvd.
Springboro, OH 45066

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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: P0110403
Permit Description: Chapter 31 Modifcation for one (1) Pulver tunnel oven and one (1) Babbco tunnel oven at a yeast-leavened bakery operation for an increase in yeast percantage and to incorporate Synthetic Minor restrictions for VOC emissions to avoid Title V and RACT requirements.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Pulver tunnel oven
Superseded Permit Number:	P0109374
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Babb Oven
Superseded Permit Number:	P0107423
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 takenby 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 Southwest Ohio Air Quality Agency 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[1] 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.

[1]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. P001, Pulver tunnel oven

Operations, Property and/or Equipment Description:

4524 lbs/hr (max.) baked products Pulver tunnel oven rated at 4.3 MMBtu/hr (max.), natural gas fired

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)d., c)(1), d)(1), e)(2), f)(1)c. and 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), as effective 11/30/01	Emissions of nitrogen oxides (NOx) shall not exceed 100 pounds per million cubic feet of natural gas and 1.84 tons per year (TPY). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T)	Emissions of volatile organic compounds (VOC) shall not exceed 5.88 pounds per ton of baked product.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V operating permit and RACT requirements	Emissions of VOC shall not exceed 30.00 TPY based on a rolling, 12-month summation. See b)(1)c. and c)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx emissions from this air contaminant source since the uncontrolled potential to emit for NOx is less than 10 tons/year.

c) Operational Restrictions

(1) The maximum annual production rate for this emissions unit shall not exceed 10,205 tons of baked product, based upon a rolling, 12-month summation of the production rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the baked products production rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. for each baked product, the production rate, in tons;

b. for each baked product, the emission rate, in pounds of VOC per ton of baked product, using the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97:

$$VOC\ EF = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90$$

where: VOC EF = VOC Emission Factor in pounds VOC per ton of baked product

Yi = initial baker's percent of yeast

ti = total yeast action time in hours

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

ts = spiking time in hours

c. the rolling, 12-month summation of the baked products production rates as recorded in a., in tons, for the current month plus the preceding 11 calendar months;

d. for each baked product, the VOC emissions calculated by multiplying the baked product production rate from a., in tons per month, by the emission rate calculated in b., in pounds of VOC per ton of baked product, and divided by 2000 pounds per ton, for an emission rate of tons of VOC per month;

e. the total VOC emissions from this emissions unit, as the summation of the VOC emissions from the baked products as calculated in d., for an emission rate of tons of VOC per month; and

f. the rolling, 12-month summation of the VOC emission rates as calculated in e., in tons, for the current month plus the preceding 11 calendar months.

e) Reporting Requirements

(1) 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.

(2) 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 5.88 pounds of VOC per ton of baked product Applicable Emission Limitation;

ii. all exceedances of the rolling, 12-month VOC Applicable Emission Limitation; and

iii. allexceedances of the rolling, 12-month limitation of the production rate.

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).

f) Testing Requirements

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

a. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 100 pounds per million cubic feet of natural gas.

Applicable Compliance Method:

If required, compliance with the NOx emission limitation shall be demonstrated by an emission test employing Method 7 of 40 CFR Part 60, Appendix A. If required, an alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established on the NOx emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98, of 100 pounds of NOx per million cubic feet of natural gas.

b. Emission Limitation and uncontrolled PTE:

Emissions of nitrogen oxides (NOx) shall not exceed 1.84 TPY.

Applicable Compliance Method:

If required, compliance with the annual NOx emission limitation shall be demonstrated by multiplying the actual annual usage of natural gas in the oven, in million cubic feet per year by the NOx emission factor of 100 pounds of NOx per million cubic feet of natural gas, and divided by 2000 pounds per ton, for an emission rate of TPY of NOx.

The applicable emission limitation and uncontrolled PTE NOx was established based on information provided by the permittee in application number A0045500 for FEPTIO number P0110403 and the NOx emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98:

4.3 Million Btu/hr, max heat input x million standard cubic feet (scf) of natural gas/1020 Million Btu = 0.004216 million scf of natural gas/hr, max heat input

0.004216 Million scf of natural gas/hr x 100 pounds of NOx/million scf of natural gas = 0.42 pound of NOx/hr

0.42 pound of NOx/hr x 8760 hrs/yr x 1 Ton/2000 pounds = 1.84 TPY of NOx.

c. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 5.88 pounds per ton of baked product.

Applicable Compliance Method:

Compliance with the pounds per ton of baked product VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97, for the white buns baked product:

VOC EF = 0.95Yi + 0.195ti – 0.51S – 0.86ts + 1.90

VOC EF = 0.95 (4.0) + 0.195 (0.9) – 0.51 (0) – 0.86 (0) + 1.90

VOC EF = 3.80 + 0.18 – 0 – 0 + 1.90

VOC EF = 5.88 pounds of VOC per ton of baked product

d. Emission Limitation:

Emissions of VOC shall not exceed 30.00 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual rolling, 12-month VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 using the VOC EF as calculated for the white buns baked product:

5.88 pounds of VOC/ton of baked product x 10,205 tons of baked product x 1 Ton/2000 pounds = 30.00 TPY of VOC.

g) Miscellaneous Requirements

(1) None.

2. P002, Babb Oven

Operations, Property and/or Equipment Description:

Babbco Model A52/48 direct fired 5.4 MMBtu bakery oven for yeast-leavened products at 5625 pounds per hour.

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)d., c)(1), d)(1), e)(2), f)(1)c. and 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), as effective 11/30/01	Emissions of nitrogen oxides (NOx) shall not exceed 100 pounds per million cubic feet of natural gas and 2.32 tons per year (TPY). Emissions of carbon monoxide (CO) shall not exceed 84 pounds per million cubic feet of natural gas and 1.93 TPY. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T)	Emissions of volatile organic compounds (VOC) shall not exceed 7.76 pounds per ton of baked product.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V operating permitting and RACT requirements	Emissions of VOC shall not exceed 60.00 TPY based on a rolling, 12-month summation. See b)(1)c. and c)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx and CO emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO is less than 10 TPY each.

c) Operational Restrictions

(1) The maximum annual production rate for this emissions unit shall not exceed 15,464 tons of baked product, based upon a rolling, 12-month summation of the production rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the baked products production rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. for each baked product, the production rate, in tons;

b. for each baked product, the emission rate, in pounds of VOC per ton of baked product, using the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97:

$$VOC\ EF = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90$$

where: VOC EF = VOC Emission Factor in pounds VOC per ton of baked product

Yi = initial baker's percent of yeast

ti = total yeast action time in hours

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

ts = spiking time in hours

c. the rolling, 12-month summation of the baked products production rates as recorded in a., in tons, for the current month plus the preceding 11 calendar months;

d. for each baked product, the VOC emissions calculated by multiplying the baked product production rate from a., in tons per month, by the emission rate calculated in b., in pounds of VOC per ton of baked product, and divided by 2000 pounds per ton, for an emission rate of tons of VOC per month;

e. the total VOC emissions from this emissions unit, as the summation of the VOC emissions from the baked products as calculated in d., for an emission rate of tons of VOC per month; and

f. the rolling, 12-month summation of the VOC emission rates as calculated in e., in tons, for the current month plus the preceding 11 calendar months.

e) Reporting Requirements

(1) 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.

(2) 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 7.76 pounds of VOC per ton of baked product Applicable Emission Limitation;

ii. all exceedances of the rolling, 12-month VOC Applicable Emission Limitation; and

iii. allexceedances of the rolling, 12-month limitation of the production rate.

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).

f) Testing Requirements

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

a. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 100 pounds per million cubic feet of natural gas.

Applicable Compliance Method:

If required, compliance with the NOx emission limitation shall be demonstrated by an emissions test employing Method 7 of 40 CFR Part 60, Appendix A. If required, an alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established on the NOx emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98, of 100 pounds of NOx per million cubic feet of natural gas.

b. Emission Limitation:

Emissions of carbon monoxide (CO) shall not exceed 84 pounds per million cubic feet of natural gas.

Applicable Compliance Method:

If required, compliance with the CO emission limitation shall be demonstrated by an emissions test employing Method 10 of 40 CFR Part 60, Appendix A. If required, an alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established on the CO emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98, of 84 pounds of CO per million cubic feet of natural gas.

c. Emission Limitation and uncontrolled PTE:

Emissions of nitrogen oxides (NOx) shall not exceed 2.32 TPY.

Applicable Compliance Method:

If required, compliance with the annual NOx emission limitation shall be demonstrated by multiplying the actual annual usage of natural gas in the oven, in million cubic feet per year by the NOx emission factor of 100 pounds of NOx per million cubic feet of natural gas, and divided by 2000 pounds per ton, for an emission rate of TPY of NOx.

The applicable emission limitation and uncontrolled PTE NOx was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the NOx emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98:

5.4 Million Btu/hr, max heat input x million standard cubic feet (scf) of natural gas/1020 Million Btu = 0.005294 million scf of natural gas/hr, max heat input

0.005294 millionscf of natural gas/hr x 100 pounds NOx/million scf of natural gas = 0.53 pound NOx/hr

0.53 pound of NOx/hr x 8760 hrs/yr x 1 Ton/2000 pounds = 2.32 TPY of NOx.

d. Emission Limitation and uncontrolled PTE:

Emissions of carbon monoxide (CO) shall not exceed 1.93 TPY.

Applicable Compliance Method:

If required, compliance with the annual CO emission limitation shall be demonstrated by multiplying the actual annual usage of natural gas in the oven, in Millions of cubic feet per year by the CO emission factor of 84 pounds of CO per Million cubic feet of natural gas, and divided by 2000 pounds per ton, for an emission rate of TPY of CO.

The applicable emission limitation and uncontrolled PTE CO was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the CO emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98:

5.4 Million Btu/hr, max heat input x Million standard cubic feet (scf) of natural gas/1020 Million Btu = 0.005294 million scf of natural gas/hr, max heat input

0.005294 millionscf of natural gas/hr x 84 pounds CO/million scf of natural gas = 0.44 pound of CO/hr

0.44 pound of CO/hr x 8760 hrs/yr x 1 Ton/2000 pounds = 1.93 TPY CO.

e. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 7.76 pounds per ton of baked product.

Applicable Compliance Method:

Compliance with the pounds per ton of baked product VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97, for the sandwich thins baked product:

VOC EF = 0.95Yi + 0.195ti – 0.51S – 0.86ts + 1.90

VOC EF = 0.95 (6.0) + 0.195 (0.8) – 0.51 (0) – 0.86 (0) + 1.90

VOC EF = 5.70 + 0.16 – 0 – 0 + 1.90

VOC EF = 7.76 pounds of VOC per ton of baked product

f. Emission Limitation:

Emissions of VOC shall not exceed 60.00 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual rolling, 12-month VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 using the VOC EF as calculated for the white buns baked product:

7.76 pounds of VOC/ton of baked product x 15,464 tons of baked product x 1 Ton/2000 pounds = 60.00 TPY of VOC.

g) Miscellaneous Requirements

(1) None.