



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
SHELBY COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 05-11194

Fac ID: 0575010232

DATE: 4/25/2006

ConAgra Foods
Rick Feasel
1910 Fair Road 1910 Fair Ro
Sidney, OH 45365

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 4/25/2006
Effective Date: 4/25/2006**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 05-11194

Application Number: 05-11194
Facility ID: 0575010232
Permit Fee: **\$1200**
Name of Facility: ConAgra Foods
Person to Contact: Rick Feasel
Address: 1910 Fair Road 1910 Fair Ro
Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1910 Fair Road
Sidney, Ohio**

Description of proposed emissions unit(s):

Administrative Modification.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

Emissions Unit ID: **P001**

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) **TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	92.4
	3.2
NOx	2.7
CO	0.25
PM	0.005
SO2	

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - pizza dough baking oven #3 using the straight-dough process (Administrative modification to PTI issued 3/22/2001)	OAC rule 3745-31-05(A)(3)	8.3 lbs/hour VOC. 92.25 TPY volatile organic compounds (VOC) combined from emissions units P001, P002 and P003 per rolling 12 month period. Emissions from natural gas oven shall not exceed: 0.15 lbs/hr and 0.66 TPY NO _x ; 0.13 lbs/hr and 0.55 TPY CO; 0.01 lbs/hr and 0.05 TPY PM; 0.008 lbs/hr and 0.04 TPY VOC; 0.001 lb/hr and 0.004 TPY SO ₂ .
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

Emissions Unit ID: P001

- 2.a The 8.3 lbs/hour VOC limitation is being developed to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum annual production rate of yeast dough products shall not exceed 50,000 tons combined for emissions units P001, P002 and P003 for a rolling 12-month period.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The production rate for each month, in tons.
 - b. The calculated VOC emission rate (3.69 lbs VOC/ton * C.1.a.), in pounds.
 - c. Natural gas usage.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total oven production rate and the volatile organic compound emissions for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
8.3 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly production rate (in tons) by a VOC emission factor of 3.69 pounds VOC/ton of yeast dough product. The VOC emission factor was determined in accordance with the equation from AP-42 Chapter 9.9.6 (2/97) as specified in E.2. below.
 - b. Emission Limitation -

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Emissions Unit ID: **P001**

92.25 tons VOC/year

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the twelve monthly VOC emission rates for the calendar year, divided by 2,000 pounds per ton.

- c. Emission Limitation -
50,000 tons yeast dough product/year combined for emissions units P001, P002 and P003.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the twelve monthly production rates for the calendar year.

- d. Emission Limitation -
0.15 lb of NO_x/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) 100 pounds of NO_x/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the NO_x emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 7 of 40 CFR, Part 60 Appendix A.

- e. Emission Limitation -
0.13 lb of CO/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) 84 pounds of CO/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the CO emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 10 of 40 CFR, Part 60 Appendix A.

- f. Emission Limitation -
0.01 lb of PM/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas

Emissions Unit ID: P001

combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 7.6 pounds of PM/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-5 of 40 CFR, Part 60 Appendix A.

- g. Emission Limitation -
0.001 lb of SO₂/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 0.6 pounds of SO₂/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR, Part 60 Appendix A.

- h. Emission Limitation -
0.008 lb of VOC/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 5.5 pounds of VOC/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 25 of 40 CFR, Part 60 Appendix A.

2. The emission factor of 3.69 pounds VOC/ton of yeast dough product, was calculated by using the following equation:

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

where:

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VOC(ef) = emission factor in pounds of uncontrolled VOC emissions per ton of bread or other yeast leavened product produced

Yi = initial baker's percent of yeast to the nearest tenth of a percent (1.75%)

ti = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (0.67 hour)

S = final (spiking) baker's percent of yeast to the nearest tenth of a percent (0%)

ts = spiking yeast action time, in hours, to the nearest tenth of an hour (0 hours)

The value of VOC(ef) is the same for all yeast leavened products in this emissions unit.

The above equation was taken from the USEPA publication "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017) dated December 1992 and is also contained in AP-42 Chapter 9.9.6 (2/97).

F. Miscellaneous Requirements

1. To assure Federally Enforceable Limitations and compliance during the first year of this permit, combined material usage for emissions units P001, P002 and P003 shall not exceed the following:

<u>MONTH</u>	<u>YEAST DOUGH PRODUCTION (TONS)</u>
1	4166.6
2	8333.3
3	12500.0
4	16666.6
5	20833.3
6	25000.0
7	29166.6
8	33333.3
9	37500.0
10	41666.6
11	45833.3
12	50000.0

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PTI A

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Emissions Unit ID: **P001**

This facility shall maintain records that will demonstrate the combined total material usage for each of the monthly limitations.

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PTI A

Modification Issued: 4/25/2006

Emissions Unit ID: P002

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - pizza dough baking oven #2 using the straight-dough process (Administrative modification to PTI issued 3/22/2001)	OAC rule 3745-31-05(A)(3)	11.1 lbs/hour VOC. 92.25 TPY volatile organic compounds (VOC) combined from emissions units P001, P002 and P003 per rolling 12 month period. Emissions from natural gas oven shall not exceed: 0.3 lbs/hr and 1.3 TPY NO _x ; 0.25 lbs/hr and 1.1 TPY CO; 0.023 lbs/hr and 0.1 TPY PM; 0.016 lbs/hr and 0.07 TPY VOC; 0.002 lb/hr and 0.008 TPY SO ₂ .
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The 11.1 lbs/hour VOC limitation is being developed to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum annual production rate of yeast dough products shall not exceed 50,000 tons combined for emissions units P001, P002 and P003 for a rolling 12-month period.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The production rate for each month, in tons.
 - b. The calculated VOC emission rate (3.69 lbs VOC/ton * C.1.a.), in pounds.
 - c. Natural gas usage.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total oven production rate and the volatile organic compound emissions for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -
11.1 lbs/hour VOC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly production rate (in tons) by a VOC emission factor of 3.69 pounds VOC/ton of yeast dough product. The VOC emission factor was determined in accordance with the equation from AP-42 Chapter 9.9.6 (2/97) as specified in E.2. below.

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- b. Emission Limitation -
92.25 tons VOC/year

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the twelve monthly VOC emission rates for the calendar year, divided by 2,000 pounds per ton.

- c. Emission Limitation -
50,000 tons yeast dough product/year combined for emissions units P001, P002 and P003.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the twelve monthly production rates for the calendar year.

- d. Emission Limitation -
0.3 lb of NO_x/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) 100 pounds of NO_x/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the NO_x emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 7 of 40 CFR, Part 60 Appendix A.

- e. Emission Limitation -
0.25 lb of CO/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) 84 pounds of CO/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the CO emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 10 of 40 CFR,

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Part 60 Appendix A.

- f. Emission Limitation -
0.023 lb of PM/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 7.6 pounds of PM/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-5 of 40 CFR, Part 60 Appendix A.

- g. Emission Limitation -
0.002 lb of SO₂/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 0.6 pounds of SO₂/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR, Part 60 Appendix A.

- h. Emission Limitation -
 0.02 lb of VOC/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 5.5 pounds of VOC/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 25 of 40 CFR, Part 60 Appendix A.

2. The emission factor of 3.69 pounds VOC/ton of yeast dough product, was calculated by using the following equation:

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

where:

VOC(ef) = emission factor in pounds of uncontrolled VOC emissions per ton of bread or other yeast leavened product produced

Y_i = initial baker's percent of yeast to the nearest tenth of a percent (1.75%)

t_i = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (0.67 hour)

S = final (spiking) baker's percent of yeast to the nearest tenth of a percent (0%)

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ts = spiking yeast action time, in hours, to the nearest tenth of an hour (0 hours)

The value of VOC(ef) is the same for all yeast leavened products in this emissions unit.

The above equation was taken from the USEPA publication "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017) dated December 1992 and is also contained in AP-42 Chapter 9.9.6 (2/97).

F. Miscellaneous Requirements

1. To assure Federally Enforceable Limitations and compliance during the first year of this permit, combined material usage for emissions units P001, P002 and P003 shall not exceed the following:

<u>MONTH</u>	<u>YEAST DOUGH PRODUCTION (TONS)</u>
1	4166.6
2	8333.3
3	12500.0
4	16666.6
5	20833.3
6	25000.0
7	29166.6
8	33333.3
9	37500.0
10	41666.6
11	45833.3
12	50000.0

This facility shall maintain records that will demonstrate the combined total material usage for each of the monthly limitations.

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PTI A

Modification Issued: 4/25/2006

Emissions Unit ID: P003

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - pizza dough baking oven #1 using the straight-dough process (Administrative modification to PTI issued 3/22/2001)	OAC rule 3745-31-05(A)(3)	8.3 lbs/hour VOC. 92.25 TPY volatile organic compounds (VOC) combined from emissions units P001, P002 and P003 per rolling 12 month period. Emissions from natural gas oven shall not exceed: 0.29 lbs/hr and 1.26 TPY NO _x ; 0.24 lbs/hr and 1.05 TPY CO; 0.02 lbs/hr and 0.09 TPY PM; 0.016 lbs/hr and 0.07 TPY VOC; 0.002 lb/hr and 0.007 TPY SO ₂ .
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 8.3 lbs/hour VOC limitation is being developed to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum annual production rate of yeast dough products shall not exceed 50,000 tons combined for emissions units P001, P002 and P003 for a rolling 12-month period.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The production rate for each month, in tons.
 - b. The calculated VOC emission rate (3.69 lbs VOC/ton * C.1.a.), in pounds.
 - c. Natural gas usage.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total oven production rate and the volatile organic compound emissions for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -
8.3 lbs/hour VOC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly production rate (in tons) by a VOC emission factor of 3.69 pounds VOC/ton of yeast dough product. The VOC emission factor was determined in accordance with the equation from AP-42 Chapter 9.9.6 (2/97) as specified in E.2. below.

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- b. Emission Limitation -
92.25 tons VOC/year

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the twelve monthly VOC emission rates for the calendar year, divided by 2,000 pounds per ton.

- c. Emission Limitation -
50,000 tons yeast dough product/year combined for emissions units P001, P002 and P003.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the twelve monthly production rates for the calendar year.

- d. Emission Limitation -
0.29 lb of NO_x/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) 100 pounds of NO_x/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the NO_x emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 7 of 40 CFR, Part 60 Appendix A.

- e. Emission Limitation -
0.24 lb of CO/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) 84 pounds of CO/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the CO emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 10 of 40 CFR,

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- f. Emission Limitation -
0.02 lb of PM/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 7.6 pounds of PM/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-5 of 40 CFR, Part 60 Appendix A.

- g. Emission Limitation -
0.002 lb of SO₂/MMBTU of actual heat input

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Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 0.6 pounds of SO₂/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR, Part 60 Appendix A.

- h. Emission Limitation -
0.02 lb of VOC/MMBTU of actual heat input

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly natural gas combustion rate (MM cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) 5.5 pounds of VOC/MM cu. ft., and then dividing by the maximum heat input to the oven (mmBTU/hr).

If required, compliance with the PE emission limit above shall be determined by emission testing performed in accordance with Methods 1-4 and 25 of 40 CFR, Part 60 Appendix A.

2. The emission factor of 3.69 pounds VOC/ton of yeast dough product, was calculated by using the following equation:

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

where:

VOC(ef) = emission factor in pounds of uncontrolled VOC emissions per ton of bread or other yeast leavened product produced

Y_i = initial baker's percent of yeast to the nearest tenth of a percent (1.75%)

t_i = total yeast action time (fermentation time) of initial yeast, in hours, to the nearest tenth of an hour (0.67 hour)

S = final (spiking) baker's percent of yeast to the nearest tenth of a percent (0%)

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ts = spiking yeast action time, in hours, to the nearest tenth of an hour (0 hours)

The value of VOC(ef) is the same for all yeast leavened products in this emissions unit.

The above equation was taken from the USEPA publication "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017) dated December 1992 and is also contained in AP-42 Chapter 9.9.6 (2/97).

F. Miscellaneous Requirements

1. To assure Federally Enforceable Limitations and compliance during the first year of this permit, combined material usage for emissions units P001, P002 and P003 shall not exceed the following:

<u>MONTH</u>	<u>YEAST DOUGH PRODUCTION (TONS)</u>
1	4166.6
2	8333.3
3	12500.0
4	16666.6
5	20833.3
6	25000.0
7	29166.6
8	33333.3
9	37500.0
10	41666.6
11	45833.3
12	50000.0

This facility shall maintain records that will demonstrate the combined total material usage for each of the monthly limitations.