



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
MIAMI COUNTY
Application No: 08-04220**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 10/31/2000

Gilardi Foods Inc
Rick Feasel
810 Dye Mill Rd
Troy, OH 453730000

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

RAPCA



FINAL PERMIT TO INSTALL 08-04220

Application Number: 08-04220
APS Premise Number: 0855140501
Permit Fee: **\$400**
Name of Facility: Gilardi Foods Inc
Person to Contact: Rick Feasel
Address: 810 Dye Mill Rd
Troy, OH 453730000

Location of proposed air contaminant source(s) [emissions unit(s)]:
810 Dye Mill Rd
Troy, Ohio

Description of proposed emissions unit(s):
natural gas fired baking oven; chapter 31 replacing 08-4099 issued 10-20-99.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

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 Related to Monitoring and Recordkeeping 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 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)

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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 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 thirty (30) 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	29.92

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>
P005 - Frozen pizza line mini-mod oven (Spoooner oven)	OAC rule 3745-31-05(A)(3)	6.83 lbs/hour and 29.92 TPY volatile organic compounds (VOC)

2. **Additional Terms and Conditions**

- 2.a The 6.83 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 16,206 tons.

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.

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 -

6.83 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 -

29.92 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 -

16,206 tons yeast dough product/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 production rates for the calendar year.

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%)

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(e_f) 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. This PTI 08-4220 for emissions unit P005 is replacing PTI 08-4099 for emissions unit P004. This PTI represents a replacement of the oven in the frozen pizza line without a change in the yeast dough product production rate.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04220

Facility ID: 0855140501

FACILITY NAME Gilardi Foods Inc

FACILITY DESCRIPTION natural gas fired baking oven; chapter 31 replacing 08-4099 issued 10-20-99. CITY/TWP Troy

SIC CODE 2038 SCC CODE 3-02-032-01 EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION Frozen pizza line mini-mod oven (Spooner oven)

DATE INSTALLED upon permit issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.83 lbs/hour	29.92	6.83 lbs/hour	29.92
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT is determined to be compliance with the applicable OAC rules and specified mass emission limitations; record keeping; and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

PTI Number: 08-04220

Facility ID: 0855140501

FACILITY NAME Gilardi Foods Inc

FACILITY DESCRIPTION natural gas fired baking oven; chapter 31 replacing 08-4099 issued 10-20-99.

CITY/TWP Troy

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0804220c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Gilardi Foods, Inc. has applied for a permit to install for the modification of the frozen pizza line currently identified as P004 at the facility in Troy, Miami County. This modification will replace the current two ovens (Oohm Band and Spooner) with a total heat input rating of 4 mmBtu/hour with one oven (Spooner oven) with a higher heat input rating of 6 mmBtu/hour.

Gilardi Foods has previously applied for a synthetic minor permit in order to limit potential emissions below the Title V applicability threshold. The previous permit, PTI 08-3761, limited the emissions of P001 to 57.56 TPY and from P002 to 1.29 TPY. P002 was withdrawn from the facility in July, 1998. With emissions unit P004, potential emissions are 87.48 TPY VOC. This PTI for emissions unit P005 is replacing P004. Therefore, potential emissions remain unchanged. This PTI does not contain federally enforceable limitations as the allowable emissions are based upon the maximum capacity of the oven at the maximum operating schedule of 8,760 hours/year.

Allowable emission rates are based upon the AP-42 Chapter 9.9.6 (2/97) emission factor of 3.69 lbs/ton of yeast dough product and the maximum hourly production rate of 3,700 lbs/hour (1.85 tons). Annual emissions are based upon a maximum annual production rate of 16,206 tons/year. Compliance shall be monitored by maintaining monthly records of the production rate and the VOC emission rates as well as the submission of annual reports which specify the production rate and VOC emission rate for the previous calendar year.

BAT is determined to be compliance with the applicable OAC rules and specified mass emission limitations; record keeping; and reporting.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

NEW SOURCE REVIEW FORM B

PTI Number: 08-04220

Facility ID: 0855140501

FACILITY NAME Gilardi Foods Inc

FACILITY DESCRIPTION

natural gas fired baking oven; chapter 31
replacing 08-4099 issued 10-20-99.

CITY/TWP

Troy

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

VOC

29.92

NEW SOURCE REVIEW FORM B

PTI Number: 08-04220

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