☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **08-04579**

A. Source Description

Con Agra operates a frozen pizza production facility in Troy, Ohio (Miami County). The steps involved in the manufacturing include mixing the dough, baking the crust, adding toppings and freezing the pizzas. The primary source of emissions from Con Agra is VOC in the form of ethanol from the yeast leavening of the dough. Con Agra currently operates two oven lines (emissions units P001 and P005) to produce pizza crust. Con Agra has submitted this PTI application to allow for the replacement of emissions unit P005 and to take credit for the drop in emissions from emissions unit P001 due to a reduction in the yeast concentration used in the leavening of the crust in emissions unit P001.

B. Facility Emissions and Attainment Status

The VOC emissions from the yeast leavening of dough is a function of the amount of yeast added to the dough and yeast action time (the amount of time the mixed dough is allowed to rise prior to baking). This relationship is explained and quantified in the Alternative Control Technology Document for bakery ovens published by U.S. EPA in 1992 (EPA 453/R-92-017). Using the equation from this document an emissions factor of 2.90 ponds of VOC/ton crust baked was calculated and is attached to this write up. This emissions factor was based on a 1% yeast concentration in the dough and 15 minutes yeast action time. Con Agra is located in Miami County, which is in attainment with the National Ambient Air Quality Standards (NAAQS) for ozone.

C. Source Emissions

The potential and allowable emissions from both emissions units are presented in the following table.

Parameter	Emissions Unit P001	Emissions Unit P006
Production Capacity (tons/hour)	17.5	3.25
Emissions Factor (lbs VOC/ton of crust)	2.9	2.9
Potential Hourly Emissions (pounds/hour)	50.7	9.4
Potential Annual Emissions (tons VOC per year)	222	41.1
Annual Production Limit (tons crust per year)	31,200	28,470*
Allowable Emissions Rate (tons VOC per year)	45.2	41.1

* No production restrictions have been requested for emissions unit P006.

As indicated in the previous table Con Agra has the potential to emit OC above major source levels for Title V and Prevention of Significant Deterioration (PSD). Therefore, a production limit of 31,200 tons has been imposed on emissions unit P001 to reduce the allowable emissions from Con Agra to 86.3 tons per year and avoid Title V and PSD permitting requirements.

D. Conclusion

The annual production limits imposed on Con Agra are sufficient to limit the VOC emissions from Con Agra below major source levels and avoid Title V and PSD permitting requirements.

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: DRAFT PERMIT TO INSTALL
MIAMI COUNTY
Application No: 08-04579

DATE: 3/30/2004

CERTIFIED MAIL

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

ConAgra Foods
Richard Feasel
810 Dye Mill Rd
Troy, OH 453730000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$750** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **RAPCA** **IN**

MIAMI COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04579** FOR AN AIR CONTAMINANT SOURCE FOR
CONAGRA FOODS

On 3/30/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **ConAgra Foods**, located at **810 Dye Mill Rd, Troy**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04579:

new mini-mod oven line.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]

DRAFT PERMIT TO INSTALL 08-04579

Application Number:	08-04579
APS Premise Number:	0855140501
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	ConAgra Foods
Person to Contact:	Richard 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):
new mini-mod oven line.

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

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 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.

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 ninety (90) days after commencing operation of the source(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

Pollutant	Tons Per Year
VOC	**86.3**
Nitrogen Oxides	**10.0**
Carbon monoxide	**8.3**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - Pizza Crust Baking, 10.65 MMBtu Natural Gas Fired Mod Line Oven. *Modification	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 50.7 lbs/hour. See A.2.a The nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 1.1 lbs/hour and 4.8 tons per year (TPY). See A.2.b. The carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.9 lb/hour and 3.9 TPY. See A.2.c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (synthetic minor to avoid PSD and Title V)	VOC emissions from this emissions unit shall not exceed 45.2 TPY on a 12 month rolling basis. See A.2.d.

2. Additional Terms and Conditions

2.a The 50.7 pounds of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The 1.1 pounds per hour and 4.8 TPY of NO_x limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.c The 0.9 pounds per hour and 3.9 TPY of CO limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.d The total VOC emissions from emissions units P001 (45.2 TPY) and P006 (41.1 TPY) shall not exceed 86.3 TPY on a 12 month rolling basis.

B. Operational Restrictions

1. The concentration of yeast in the dough baked in this emissions unit shall not exceed 1.0 bakers percent.

2. The yeast action time for all dough baked in this emissions unit shall not exceed 15 minutes.

3. The yeast dough crust production rate for this emissions unit shall not exceed 31,200 tons per year on a 12 month rolling basis. This emissions unit was already operating under the terms and conditions of a synthetic minor PTI, therefore, it is not necessary to establish record keeping to ensure enforceability during the first 12 calendar months of operation following issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. The yeast concentration, in bakers percent for each batch of yeast dough crust baked.

   b. The yeast action time for each batch of yeast dough crust baked.

   c. The yeast dough crust production rate for each month, in tons.

   d. The yeast dough crust production rate, in tons, per rolling 12-month period..

   e. The calculated VOC emission rate (2.90 lbs VOC/ton * C.1.d.), in tons per rolling 12-month period.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:

   a. All yeast dough crust batches that the yeast concentration exceeded 1.0 bakers percent.

   b. All yeast dough crust batches where the yeast action time exceeded 15 minutes.

   c. All exceedances of the rolling 12-month VOC emissions limitation and the actual VOC emissions for each such month.

   d. All exceedances of the 12 month rolling 31,200 tons per year yeast dough crust production rate limitation and the actual yeast dough production rate for this emissions unit.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:

   a. The total yeast dough crust production rate, in tons, per rolling 12-month period.

   b. The total VOC emissions from all yeast dough crust production, in tons, per rolling 12-month period.

   These reports shall be submitted by January 31 of each year and shall cover the previous calendar 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 -
   The VOC emissions from this emissions unit shall not exceed 50.7 lbs/hour.

   Applicable Compliance Method -
   Compliance shall be determined by multiplying the maximum hourly production rate (17.5 tons/hour) by a VOC emission factor of 2.9 pounds VOC/ton of yeast dough product. The VOC emission factor was determined in accordance with the Alternative Control Technology Document for Bakery Ovens (EPA 453/R-92-017)(12/1992).

   b. Emission Limitation -
   The VOC emissions from this emissions unit shall not exceed 45.2 TPY on a 12 month rolling basis.

   Applicable Compliance Method -
   Compliance shall be based upon record keeping as specified in C.1.

c. Emission Limitation -
The NO_x emissions from this emissions unit shall not exceed 1.1 lbs/hour.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (0.01065 million cubic feet/hour) by the emission factor of 100 lbs NOx/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98).

d. Emission Limitation -
The NOx emissions from this emissions unit shall not exceed 4.8 TPY.

Applicable Compliance Method -
Compliance shall be determined by multiplying maximum annual gas burning capacity of the emissions unit (93.294 million cubic feet/year) by the emission factor of 100 lbs NOx/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98), and dividing by 2,000 lbs/ton.

e. Emission Limitation -
The CO emissions from this emissions unit shall not exceed 0.9 lb/hour.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (0.01065 million cubic feet/hour) by the emission factor of 84 lbs CO/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98).

f. Emission Limitation -
The CO emissions from this emissions unit shall not exceed 3.9 TPY.

Applicable Compliance Method -
Compliance shall be determined by multiplying maximum annual gas burning capacity of the emissions unit (93.294 million cubic feet/year) by the emission factor of 84 lbs CO/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98), and dividing by 2,000 lbs/ton.

F. Miscellaneous Requirements

1. PTI 08-04579 supercedes the requirements of PTI 08-03761 for this emissions unit. This modification was requested to reduce the allowable emissions rates for this emissions unit due to a reduction in the yeast concentration used (1.5 bakers percent to 1.0 bakers percent) in the dough and the yeast action time (40 minutes to 15 minutes). Based on the new parameters the emissions factor was reduced from 3.69 lbs VOC/ton of dough to 2.90 lbs VOC/ton of dough. The allowable emission rate for this emissions unit has been reduced from 57.6 TPY to 45.2 TPY VOC.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P006 - Pizza Crust Baking, 12 MMBTU Natural Gas Fired Mini Mod Oven Line	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.4 lbs/hour. See A.2.a The nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 1.2 lbs/hour and 5.3 TPY. See A.2.b. The carbon monoxide (CO) emissions from this emissions unit shall not exceed 1.0 lbs/hour and 4.4 TPY. See A.2.c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (synthetic minor to avoid PSD and Title V)	VOC emissions from this emissions unit shall not exceed 41.1 TPY on a 12 month rolling basis. See A.2.d.

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2. Additional Terms and Conditions

2.a The 9.4 pounds of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The 1.2 pounds per hour and 5.3 TPY of NO_x limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.c The 1.0 pounds per hour and 4.4 TPY of CO limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

2.d The total VOC emissions from emissions units P001 (45.2 TPY) and P006 (41.1 TPY) shall not exceed 86.3 TPY on a 12 month rolling basis.

B. Operational Restrictions

1. The concentration of yeast in the dough baked in this emissions unit shall not exceed 1.0 bakers percent.

2. The yeast action time for all dough baked in this emissions unit shall not exceed 15 minutes.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. The yeast concentration, in bakers percent for each batch of yeast dough crust baked.

   b. The yeast action time for each batch of yeast dough crust baked.

   c. The yeast dough crust production rate for each month, in tons.

   d. The yeast dough crust production rate, in tons, per rolling 12-month period..

   e. The calculated VOC emission rate (2.90 lbs VOC/ton * C.1.d.), in tons per rolling 12-month period.

2. The permit to install for this emissions unit P006 was evaluated based on the actual materials (yeast and yeast action time) employed, and the design parameters of the emissions units exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model

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(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Ethanol (Ethyl Alcohol)

TLV(mg/m^3): 1,844,254

Maximum Hourly Emission Rate (lbs/hr): 9.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 377.9

MAGLC(ug/m^3): 18,843

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:

   a. All yeast dough crust batches that the yeast concentration exceeded 1.0 bakers percent.

   b. All yeast dough crust batches where the yeast action time exceeded 15 minutes.

   c. All exceedances of the rolling 12-month VOC emissions limitation for emissions units P001 and P006 and the actual VOC emissions for each such month.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:

   a. The total yeast dough crust production rate, in tons, per rolling 12-month period.

   b. The total VOC emissions from all yeast dough crust production, in tons, per rolling 12-month period.

   These reports shall be submitted by January 31 of each year and shall cover the previous calendar 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 -
   The VOC emissions from this emissions unit shall not exceed 9.4 lbs/hour.

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Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly production rate (3.25 tons/hour) by a VOC emission factor of 2.9 pounds VOC/ton of yeast dough product. The VOC emission factor was determined in accordance with the Alternative Control Technology Document for Bakery Ovens (EPA 453/R-92-017)(12/1992).

b. Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 41.1 TPY on 12-month rolling basis.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1.

c. Emission Limitation -
The NO_x emissions from this emissions unit shall not exceed 1.2 lbs/hour.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (0.012 million cubic feet/hour) by the emission factor of 100 lbs NOx/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98).

d. Emission Limitation -
The NOx emissions from this emissions unit shall not exceed 5.3 TPY.

Applicable Compliance Method -
Compliance shall be determined by multiplying maximum annual gas burning capacity of the emissions unit (105.1 million cubic feet/year) by the emission factor of 100 lbs NOx/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98), and dividing by 2,000 lbs/ton.

e. Emission Limitation -
The CO emissions from this emissions unit shall not exceed 1.0 lbs/hour.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (0.012 million cubic feet/hour) by the emission factor of 84 lbs CO/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98).

f. Emission Limitation -
The CO emissions from this emissions unit shall not exceed 4.4 TPY.

Applicable Compliance Method -
Compliance shall be determined by multiplying maximum annual gas burning capacity of the emissions unit (105.1 million cubic feet/year) by the emission factor of 84 lbs CO/million cubic feet as specified in AP-42 Chapter 1.4-1 (2/98), and dividing by 2,000 lbs/ton.

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F. Miscellaneous Requirements

None

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