

**A. Applicable Emission Limitations and/or Control Requirements:**

1. The emissions of Organic Compounds from emissions unit P001 shall not exceed 4.37 pounds per hour and 15.68 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
2. The emissions of Organic Compounds from emissions unit P002 shall not exceed 4.43 pounds per hour and 15.89 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
3. The hourly emission limitations outlined are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

**B. Operational Restrictions:**

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

**C. Monitoring and Recordkeeping Requirements:**

1. The permittee shall maintain monthly records which summarize the OC emissions from P001 and P002 during the previous calendar month. The following equation taken from Alternative Control Technology Document for Bakery Oven Emission, EPA 453/R-92-017, December 1992 shall be used to calculate the OC emissions from the ovens:

$$\text{OC Emission Factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.9$$

Where,

OC EF = pounds of organic compounds per ton of bread baked;

$Y_i$  = initial baker's percent of yeast to the nearest tenth of a percent;

$t_i$  = total yeast action time in hours to the nearest tenth of an hour;

S = final (spike) baker's percent of yeast to the nearest tenth of a percent; and

$t_s$  = spiking time in hours to the nearest tenth of an hour.

2. The permittee shall maintain monthly records of the rolling, 12-month summation of the OC emissions.
3. Each record 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, copies of all reports required by this permit. Such records may be maintained in computerized form.

**D. Reporting Requirements:**

1. The permittee shall submit quarterly reports to the Ohio EPA field office which the OC emissions from emissions units P001 and P002 during each calendar month of the quarter, and the updated rolling, 12-month total of OC emissions.
2. 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 preventative 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 30, April 30, July 30, and October 30 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).

**E. Compliance Methods/Testing Requirements:**

1. Compliance with the emission limitations in Section A of these terms and conditions shall be demonstrated by the recordkeeping requirements in T&C C.1 and C.2.

**F. Miscellaneous Requirements:**

1. If probable cause exists indicating that these emissions units are causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions units shall be required to submit and implement a control program which will bring the emissions units into compliance.
2. This PTI is a modification to PTI 14-4179. Upon issuance, the terms and conditions of this PTI will supersede PTI 14-4179.
3. This permit allows the use of materials specified by the permittee in the application for PTI number 14-4607. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

Pollutant: Ethanol

TLV (ug/m3): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 8.8

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 9781

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,762

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4607 and the operating permit:

- a. Any changes in the 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 specified in the above table.
- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
- d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

VIP Products  
1400 State Avenue  
Cincinnati, OH 45204

PN: 1431073947

This PTI is a modification to PTI 14-4179. The purpose of this PTI is to increase VIP Products' allowable OC emissions from 24.71 tpy to 31.57 tpy. VIP Products is a bakery that has two 1500 lbs/hr ovens. The allowable emission limits in PTI 14-4179 were established based on a maximum operating schedule of 5616 hours per year - VIP Products' actual operating hours at the time were only 3744 hours per year. VIP Products' most recent compliance report indicated that VIP Products had operated greater than 5616 hours during the previous 12 months. Consequently, VIP Products exceeded the allowable emission limitations in PTI 14-4179. To ensure compliance in the future, VIP Products has requested their allowable emission limitation be increased.

The applicable rules for the ovens are OAC rules 3745-15-07, 3745-21-07, and 3745-31-05. The potential emissions for P001 are 4.37 lbs/hr and 15.68 tpy OC, and for P002 are 4.43 lbs/hr and 15.89 tpy OC. BAT is satisfied by the emission limitations and compliance with Ohio's Air Toxics Policy.

The fee for this PTI is \$800. This fee is based on a fee of \$400 for each source (MPWR = \$400).

This agency requests that this PTI be issued in draft to allow the surrounding community the opportunity to comment. VIP Products is located in Lower Price Hill, which is an environmentally sensitive part of Cincinnati.

Prepared by: Kathy Clayton/Elizabeth Evans  
Date prepared: June 29, 1998

June 26, 1998

Eileen Gallagher  
Lower Price Hill Community Council  
656 Neave Street  
Cincinnati, OH 45204

Dear Ms. Gallagher:

The Hamilton County Department of Environmental Services is a contractual agent for the Ohio Environmental Protection Agency. One of the Department's responsibilities is processing Permit to Install (PTI) applications for air contaminant sources in Hamilton County. A PTI is required for air pollution sources installed after 1974. While a PTI may be required for an existing air pollution source, many PTIs are for new air contaminant sources yet to be placed into a community.

In an effort to inform communities of upcoming permitting actions affecting them, our Department is notifying the Lower Price Hill Community Council that the following company has applied for a PTI within Lower Price Hill. A brief description of the source to be installed, an approximate estimate of the quantity and type of emissions, the control equipment to be used, and basic facility information is listed below.

Company: VIP Products, 1400 State Ave., Cincinnati, OH 45204

Proposed Sources:

VIP Products proposes to increase production in their two existing bakery ovens. The proposed increase in production will increase organic compound emissions by 6.86 tons per year.

Emission Estimate Summary\*:

<u>Pollutant</u>	<u>Actual Emissions - Tons Per Year</u>	<u>Potential</u>
<u>Emissions - TPY</u>		
Organic Compound	27.84	31.57
Particulate Matter	None	None
Sulfur Dioxide	None	None
Nitrogen Oxides	None	None
Carbon Monoxide	None	None
Lead	None	None

\*This emission data is preliminary and should not to be used for purposes other than community notification.

Letter to Eileen Gallagher  
June 26, 1998

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Please forward this information to all interested individuals in your community. I am planning to discuss this information at the next Lower Price Hill Community Council meeting. If you, or any other interested individual, cannot attend that meeting but would like to discuss this permitting action, please contact me within the next two weeks. You can reach me directly at 333-4749.

Sincerely,

Kathy Clayton  
Environmental Compliance Specialist

cc: Karen Schlanger, Urban Appalachian Council  
Dick Roth, VIP Products

**Meeting Summary:**

A meeting was held at VIP Products' offices on June 25, 1998 to discuss this agency's warning letter dated June 12, 1998. Dick Roth (Owner/President) and Kevin O'Rourke (Director of Operations) represented VIP Products and Kathy Clayton represented this agency during the meeting.

Mr. Roth explained that VIP Products started running a third shift for the lower level oven late last year. He stated that production in the upper level oven is down, but production in the lower level oven is higher than ever. Mr. Roth stated that they intend to continue to run the lower level oven for three shifts. He added that he would also like to add a third shift to the upper level oven if business for those products improves. I explained that VIP Products would need a new PTI to increase the allowable emissions. Mr. Roth said he would like a new PTI. The applications were completed, signed, and submitted during the meeting.