



State of Ohio Environmental Protection Agency

Street Address:

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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  
HURON COUNTY  
Application No: 03-13973**

**CERTIFIED MAIL**

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

**DATE: 6/12/2003**

Pepperidge Farm Inc  
Rex Browning  
3320 State Rte 103 E  
Willard, OH 44890

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

NWDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 6/12/2003  
Effective Date: 6/12/2003**

**FINAL PERMIT TO INSTALL 03-13973**

Application Number: 03-13973  
APS Premise Number: 0339030011  
Permit Fee: **\$700**  
Name of Facility: Pepperidge Farm Inc  
Person to Contact: Rex Browning  
Address: 3320 State Rte 103 E  
Willard, OH 44890

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**3320 State Rte 103 E  
Willard, Ohio**

Description of proposed emissions unit(s):  
**Modification to Crackerline no. 5.**

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**

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 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>
OC	66.71
NOx	12.66
CO	10.64

**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>
P001 - Cracker Line no. 4 - Administrative Modification to PTI# 03-13298 issued 2-2-00 to correct emission limits based on a lower maximum line capacity. (See F.1.)	OAC rule 3745-31-05(A)(3)	Control requirements (see A.1.2.a)  <u>emissions from baking:</u> stack: 1.03 pounds Organic Compounds (OC)/hour, 4.51 tons OC/year  fugitive: 2.28 pounds OC/hour, 9.99 tons OC/year  <u>emissions from combustion:</u> 1.14 pounds nitrogen oxides NOx/hour, 4.99 tons NOx/year  0.96 pound Carbon Monoxide (CO)/hour, 4.20 tons CO/year  0.13 pound OC/hour, 0.57 ton OC/year
	OAC rule 3745-17-11(B)(1)	None (see A.1.2.b)
	OAC rule 3745-17-07(A)	None (see A.1.2.c)
	OAC rule 3745-23-06(B)	See A.1.2.d

**2. Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of regenerative thermal oxidation with a 90% capture efficiency and 95% control efficiency for organic compound emissions and compliance with the terms and conditions of this permit.

- 2.b** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P-3 county.
- 2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

**B. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerators, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1550 degrees Fahrenheit.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerators when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- 2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerators, when the emissions unit was in operation, was less than 1550 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 3. The permit to install for emissions units P001, P005 and P006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. 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 (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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m<sup>3</sup>): 1880

Maximum Hourly Emission Rate (lbs/hr): 7.78\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 807.8

MAGLC (ug/m<sup>3</sup>): 44,762

\*Emission limit from PTI# 03-13928.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification 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 still 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 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.

4. 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 deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerators do not comply with the temperature limitation specified above.

**E. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
stack: 1.03 pounds OC/hour, 4.51 tons OC/year  
fugitive: 2.28 pounds OC/hour, 9.99 tons OC/year

Applicable Compliance Method:

The hourly emission limitations are based on the maximum production rate of 0.99 tons/hour, an emission factor of 23.08 pounds of OC/ton of product (based on emissions testing on similar sources), an estimated capture efficiency of 90 percent and an estimated control efficiency of 95 percent.

If required, the permittee shall demonstrate compliance with the hourly emission limitations and capture efficiency requirements by testing in accordance with Methods 1 - 4, and 18, 25, or 25a of 40 CFR Part 60, Appendix A, and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M.

The annual emission limitations were developed by multiplying the pound/hour limitations by the maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation:  
1.14 pounds NO<sub>x</sub>/hour, 4.99 tons NO<sub>x</sub>/year

Applicable Compliance Method:

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 12 million BTU/hour multiplied by the emission factor 0.095 pound NO<sub>x</sub>/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation:  
0.96 pound CO/hour, 4.20 tons CO/year

**Applicable Compliance Method:**

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 12 million BTU/hour multiplied by the emission factor 0.080 pound CO/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 10 of 40 CFR Part 60, Appendix A.

- d. Emission Limitation:  
0.13 pound OC/hour, 0.57 ton OC/year

**Applicable Compliance Method:**

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 12 million BTU/hour multiplied by the emission factor 0.011 pound OC/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 18, 25, or 25a of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

None

**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 - Cracker Line no. 5 - Modification to PTI #03-13298 issued 2-2-00. Modification to increase emission limits based on a physical increase in line capacity. (See F.1.)	OAC rule 3745-31-05(A)(3)	Control requirements (see A.1.2.a)  <u>emissions from baking:</u> stack: 2.00 pounds Organic Compounds (OC)/hour, 8.76 tons OC/year  fugitive: 4.45 pounds OC/hour, 19.49 tons OC/year  <u>emissions from combustion:</u> 0.91 pounds nitrogen oxides (NOx)/hour, 3.99 tons NOx/year  0.77 pound Carbon Monoxide (CO)/hour, 3.37 tons CO/year  0.10 pound OC/hour, 0.44 ton OC/year
	OAC rule 3745-17-11(B)(1)	None (see A.1.2.b)
	OAC rule 3745-17-07(A)	None (see A.1.2.c)
	OAC rule 3745-23-06(B)	See A.1.2.d

2. **Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of regenerative thermal oxidation with a 90% capture efficiency and 95% control efficiency for organic compound emissions and compliance with the terms and conditions of this permit.

- 2.b** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P-3 county.
- 2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

## **B. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerators, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1550 degrees Fahrenheit.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerators when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- 2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerators, when the emissions unit was in operation, was less than 1550 degrees Fahrenheit; and nitrogen oxides
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 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 deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerators do not comply with the temperature limitation specified above.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 180 days following the modification of emissions unit P005.
  - b. The emission testing shall be conducted to demonstrate compliance with the 95% OC control efficiency and 90% OC capture efficiency.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the control efficiency for OC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA’s “Guidelines for Determining Capture Efficiency,” dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.”

- e. The test(s) shall be conducted while the emissions unit is operating at under "worst case" conditions, which will be approved by the appropriate Ohio EPA District Office or local air agency. The "Intent to Test", as specified below, may serve as the permittee's proposed testing scenario(s).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations established in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:  
stack: 2.00 pounds OC/hour, 8.76 tons OC/year  
fugitive: 4.45 pounds OC/hour, 19.49 tons OC/year

Applicable Compliance Method:

Compliance with the lb/hr limitations shall be determined in accordance with the test methods and procedures specified in condition E.1. above.

The annual emission limitations were developed by multiplying the pound/hour limitations by the maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation

- b Emission Limitation:  
0.91 pounds NO<sub>x</sub>/hour, 3.99 tons NO<sub>x</sub>/year

Applicable Compliance Method:

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 9.6 million BTU/hour multiplied by the emission factor 0.095 pound NO<sub>x</sub>/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A.

- c Emission Limitation:  
0.77 pound CO/hour, 3.37 tons CO/year

Applicable Compliance Method:

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 9.6 million BTU/hour multiplied by the emission factor 0.080 pound CO/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 10 of 40 CFR Part 60, Appendix A.

- d Emission Limitation:  
0.10 pound OC/hour, 0.44 ton OC/year

Applicable Compliance Method:

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 9.6 million BTU/hour multiplied by the emission factor 0.011 pound OC/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. This emissions unit does not include the processing of the dough prior to its loading onto the cracker line.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in this emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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>
P006 - Cracker Line no. 6 - Administrative Modification to PTI# 03-13298 issued 2-2-00 to correct emission limits based on a lower maximum line capacity. (See F.1.)	OAC rule 3745-31-05(A)(3)	Control requirements (see A.1.2.a)  <u>emissions from baking:</u> stack: 1.60 pounds Organic Compounds (OC)/hour, 7.01 tons OC/year  fugitive: 3.55 pounds OC/hour, 15.55 tons OC/year  <u>emissions from combustion:</u> 0.84 pounds nitrogen oxides NOx/hour, 3.68 tons NOx/year  0.70 pound Carbon Monoxide (CO)/hour, 3.07 tons CO/year  0.09 pound OC/hour, 0.39 ton OC/year
	OAC rule 3745-17-11(B)(1)	None (see A.1.2.b)
	OAC rule 3745-17-07(A)	None (see A.1.2.c)
	OAC rule 3745-23-06(B)	See A.I.2.d.

**2. Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of regenerative thermal oxidation with a 90% capture and 95% control efficiency for organic compound emissions and compliance with the terms and conditions of this permit.

- 2.b** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P-3 county.
- 2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

## **B. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerators, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1550 degrees Fahrenheit.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerators when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- 2. The permittee shall collect and record the following information for each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerators, when the emissions unit was in operation, was less than 1550 degrees Fahrenheit; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 3. The permit to install for emissions units P001, P005 and P006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. 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 (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 summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: ethanol

TLV (mg/m<sup>3</sup>): 1880

Maximum Hourly Emission Rate (lbs/hr): 7.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 807.8

MAGLC (ug/m<sup>3</sup>): 44,762

\*Emission limit from PTI# 03-13928.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification 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 still 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 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.

4. 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 deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerators do not comply with the temperature limitation specified above.

**E. Testing Requirements**

- 1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
stack: 1.60 pounds OC/hour, 7.01 tons OC/year  
fugitive: 3.55 pounds OC/hour, 15.55 tons OC/year

Applicable Compliance Method:

The hourly emission limitations are based on the maximum production rate of 1.54 tons/hour, an emission factor of 23.08 pounds of OC/ton of product (based on emissions testing on similar sources), an estimated capture efficiency of 90 percent and an estimated control efficiency of 95 percent.

If required, the permittee shall demonstrate compliance with the hourly emission limitations and capture efficiency requirements by testing in accordance with Methods 1 - 4, and 18, 25, or 25a of 40 CFR Part 60, Appendix A, and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M.

The annual emission limitations were developed by multiplying the pound/hour limitations by the maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation:  
0.84 pound NOx/hour, 3.68 tons NOx/year

Applicable Compliance Method:

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 9.6 million BTU/hour multiplied by the emission factor 0.095 pound NO<sub>x</sub>/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation:  
0.70 pound CO/hour, 3.07 tons CO/year

**Applicable Compliance Method:**

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 9.6 million BTU/hour multiplied by the emission factor 0.080 pound CO/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 10 of 40 CFR Part 60, Appendix A.

- d. Emission Limitation:  
0.09 pound OC/hour, 0.40 ton OC/year

**Applicable Compliance Method:**

The emission limitations represent the potential to emit\* for this emissions unit. Therefore no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

\*The potential to emit for this emissions unit is based on the unit's maximum heat input of 8.8 million BTU/hour multiplied by the emission factor 0.011 pound OC/million BTU from AP-42 Table 1.4-1 (revised 3/98) and operating at 8760 hrs per year.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. This emissions unit does not include the processing of the dough prior to its loading onto the cracker line.