

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: December 7, 2009 Effective Date: April 26, 2010
Revision Date: April 26, 2010 Expiration Date: December 7, 2014

Revision Type: Amendment

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 46-00003

Synthetic Minor

Federal Tax Id - Plant Code: 14-0677530-3

Owner Information

Name: OROGRAIN BAKERIES MFG INC

Mailing Address: PO BOX 110

NORRISTOWN, PA 19404-0110

Plant Information

Plant: OROGRAIN BAKERIES/NORRISTOWN

Location: 46 Montgomery County 46944 Plymouth Township

SIC Code: 2051 Manufacturing - Bread, Cake, And Related Products

Responsible Official

Name: ELIJAH RICHARDSON

Title: GENERAL PLANT MANAGER

Phone: (610) 825 - 1140 Ext.450

Permit Contact Person

Name: RICK HANSEN

Title: ENGINEERING MANAGER Phone: (610) 825 - 1140 Ext.453

[Signature]	
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JOSEPH A. FEOLA, SOUTHEAST REGIONAL DIRECTOR



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General State Only Requirements

- #001 Definitions.
- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.

Section C. Site Level State Only Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

Section D. Source Level State Only Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

Section E. Alternative Operating Scenario(s)

- E-I: Restrictions
- E-II: Testing Requirements





SECTION A. Table of Contents

E-III: Monitoring RequirementsE-IV: Recordkeeping RequirementsE-V: Reporting RequirementsE-VI: Work Practice StandardsE-VII: Additional Requirements

Section F. Emission Restriction Summary

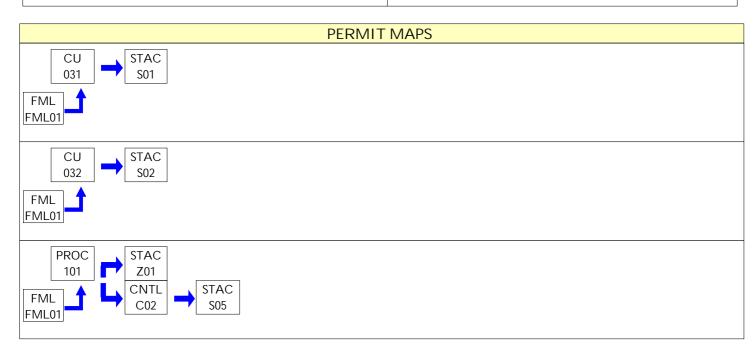
Section G. Miscellaneous





SECTION A. Site Inventory List

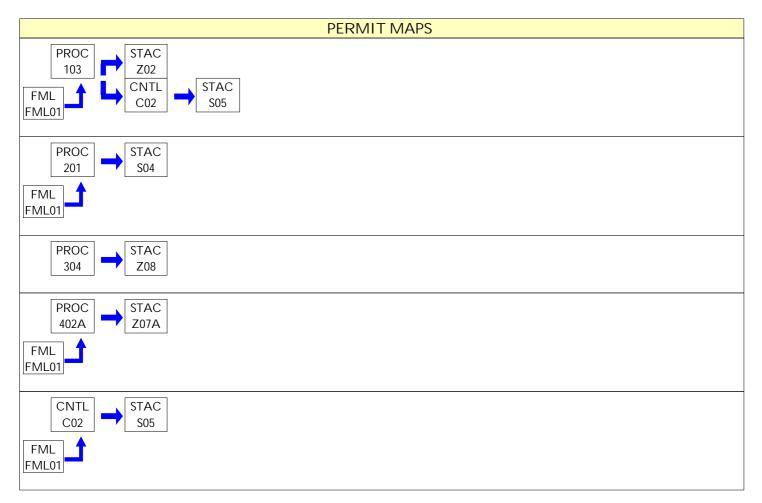
Source I	D Source Name	Capacity	Throughput	Fuel/Material
031	BOILER 1	5.000	MMBTU/HR	
		4.850	MCF/HR	Natural Gas
032	BOILER 2	5.000	MMBTU/HR	
		4.850	MCF/HR	Natural Gas
101	ROLL BAKING LINE (#1)	2.540	MMBTU/HR	
		2.470	MCF/HR	Natural Gas
		5,400.000	Lbs/HR	BAKED ROLLS
103	BREAD BAKING LINE (#3)	6.707	MMBTU/HR	
		6.510	MCF/HR	Natural Gas
		14,040.000	Lbs/HR	BAKED BREAD
201	EMERGENCY GENERATOR	0.583	MCF/HR	Natural Gas
304	INK JET PRINTERS (11)			
402A	AIR HEATERS (32)	14.404	MMBTU/HR	
		13.980	MCF/HR	Natural Gas
C02	CSM CATALYTIC OXIDIZER	2.910	MCF/HR	Natural Gas
FML01	NATURAL GAS PIPELINE			
S01	BOILER 1 STACK			
S02	BOILER 2 STACK			
S04	EMERGENCY GENERATOR STACK			
S05	CSM CATALYTIC OXIDIZER STACK			
Z01	ROLL BAKING LINE FUGITIVE EMISSIONS			
Z02	BREAD BAKING LINE FUGITIVE EMISSIONS			
Z07A	AIR HEATERS FUGITIVE EMISSIONS			
Z08	INK JET PRINTERS FUGITIVE EMISSIONS			





46-00003









#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

[25 Pa. Code § 127.703] #004

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.



(2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension, modification, revision, renewal, and re-issuance of each operating permit or part thereof.

- (b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).
 - (1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.
 - (2) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.
- (c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund".

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
 - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.



#007 [25 Pa. Code §§ 127.441 & 127.444]

Compliance Requirements.

- (a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:
 - (1) Enforcement action
 - (2) Permit termination, revocation and reissuance or modification
 - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.





- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450 & 127.462]

Operating Permit Modifications

- (a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:
- (b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air



Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined



in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]

Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisifies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]

Reporting Requirements.

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.



- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given in the permit transmittal letter, or otherwise notified)

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized



records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privileges.

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning operations, as specified in Condition # 008(a) (e), Section C, of this permit.
- (g) Sources and classes of sources, other than those identified in (a) (f), above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive air contaminant emissions from the source, after appropriate controls, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution.
- (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

No person may permit the emission into the outdoor atmosphere of fugitive particulate matter (PM) from a source specified in Condition # 002(a) - (g), Section C, of this permit, if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

No person may permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

005 [25 Pa. Code §123.41]

Limitations

The permittee shall ensure that emission into the outdoor atmosphere of visible air contaminants from this facility occurs in such a manner that the opacity of the emission is neither of the following:

- (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.
- (b) Equal to or greater than 60% at any time.



006 [25 Pa. Code §123.42]

Exceptions

The emission restrictions specified in Condition # 005, Section C, of this permit, shall not apply to a visible air contaminant emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the restrictions.
- (b) When the emission results from sources specified in Condition # 002(a) (g), Section C, of this permit.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that emission into the outdoor atmosphere of volatile organic compounds (VOCs) from this facility occurs in such a manner that the rate of the emission is less than 25 tons/yr, calculated monthly as a twelve (12)-month rolling sum.

008 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material except the following:

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (d) A fire set solely for recreational or ceremonial purposes.
- (e) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Sections A or G, of this permit, may be in excess of the restrictions specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Article III, the permittee shall be required to perform whatever test(s) is deemed necessary by the Department to determine the actual emission rate(s).
- (b) Any test(s) required in (a), above, shall be performed in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

Visible air contaminant emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements.
- (b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices



approved by the Department.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall monitor this facility, once per operating day, for the following:
 - (1) Odors, which the Department may determine to be objectionable.
 - (2) Visible air contaminant emissions.
 - (3) Fugitive air contaminant emissions.
- (b) All detectable objectionable odors that originate on-site and cross the property line, as well as visible and/or fugitive air contaminant emissions that originate on-site, shall:
- (1) Be investigated.
- (2) Be reported to the facility management, or individual(s) designated by the permittee.
- (3) Be recorded in a permanent written log.
- (c) At the end of 6 months, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to weekly for the next 6-month period.
- (d) At the end of the second 6-month period, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on, but not limited to, the review of complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall maintain records of all monitoring of odors and visible and fugitive air contaminant emissions, including deviations from the conditions found in Section C, of this permit. The record of deviations shall contain, at a minimum, the following items for each incident:
 - (1) A description of the deviation.
 - (2) The source(s) and/or associated air pollution control device(s) and location(s).
 - (3) The starting and ending date(s) and times.
 - (4) The cause(s).
- (5) The corrective action(s) taken, if necessary to abate the situation and prevent future occurrences.
- (b) The monitoring shall be recorded and maintained in a Department-approved format and time frame.



013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all of this facility's emission increases, including the following types:

- (a) De minimis emission increases without notification to the Department.
- (b) De minimis emission increases with notification to the Department, via letter.
- (c) Emission increases resulting from a Request for Determination of Changes of Minor Significance and Exemption from Plan Approval/Operating Permit (RFD) to the Department.
- (d) Emission increases resulting from the issuance of a plan approval and subsequent operating permit.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

All records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with Condition # 020(b), Section B, of this permit, and shall be made available to the Department upon written or verbal request within a reasonable time.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following emissions from this facility on a monthly and 12-month rolling basis, calculated using Department-approved methods:

- (a) The total carbon monoxide (CO) emissions.
- (b) The total nitrogen oxides (NOx) emissions.
- (c) The total VOC emissions.

V. REPORTING REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall, within two (2) hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction(s) of a source(s) and/or associated air pollution control device(s) listed in Sections A or G, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the restrictions specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Article III.
- (b) Any malfunction(s) that occurs at this facility, and poses an imminent danger to public health, safety, welfare, and the environment, or would violate permit conditions if the source(s) and/or associated air pollution control device(s) were to continue to operate after the malfunction(s), shall immediately be reported to the Department by telephone at the above number.
- (c) A written report shall be submitted to the Department within 2 working days following the notification of the incident, and shall describe, at a minimum, the following:
 - (1) The malfunction(s).
 - (2) The source(s) and/or associated air pollution control device(s) and location(s).



- (3) The starting and ending date(s) and time(s).
- (4) The cause(s).
- (5) The emission(s).
- (6) Any corrective action(s) taken.
- # 017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. Part 68.]

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 C.F.R. Part 68 (relating to chemical accident prevention provisions), and the Federal Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 C.F.R. Part 68, and the Federal Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act when a regulated substance listed in 40 C.F.R. § 68.130 is present in a process in more than the threshold quantity at this facility. The permittee shall submit the RMP to the EPA according to the following schedule and requirements:
 - (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed in 40 C.F.R. § 68.130.
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 C.F.R. § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 C.F.R. Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this condition, the term "process" shall be as defined in 40 C.F.R. § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If this facility is subject to 40 C.F.R. Part 68, as part of the certification required under this permit, the permittee shall perform the following:
- (1) Submit a compliance schedule for satisfying the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. § 68.10(a).
- (2) Certify that the facility is in compliance with all requirements of 40 C.F.R. Part 68 including the registration and submission of the RMP.
- (e) If the facility is subject to 40 C.F.R. Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for 5 years in accordance with 40 C.F.R. § 68.200.





(f) When the facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 C.F.R. Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 C.F.R. Part 68.

018 [25 Pa. Code §135.3]

Reporting

- (a) The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from each previouslyreported source(s), a new source(s) which was first operated during the preceding calendar year, and each source(s) modified during the same period that was not previously reported, including any source(s) listed in Section G, of this permit.
- (b) The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443(b) and 127.444.]

The permittee shall ensure that all source(s) and associated air pollution control device(s) listed in Sections A and G, of this permit, are operated and maintained in a manner consistent with good operating and maintenance and air pollution control practices, and in accordance with the manufacturers' specifications.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air pollution control device(s), if necessary, to reduce the air contaminant emissions to within applicable restrictions, if at any time the operation of a source(s) listed in Sections A or G, of this permit, is causing the emission of air contaminants in excess of the restrictions specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Article III.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee may not modify any air contaminant system identified in Sections A or G, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition # 013(g), Section B, of this permit.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the following emissions from this facility on a monthly and 12-month rolling basis, using Department-approved methods:

- (a) The total CO emissions.
- (b) The total NOx emissions.
- (c) The total VOC emissions.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VIII. COMPLIANCE CERTIFICATION.



46-00003

SECTION C.

OROGRAIN BAKERIES/NORRISTOWN



No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

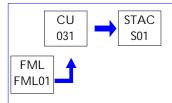
Site Level Requirements



Source ID: 031 Source Name: BOILER 1

Source Capacity/Throughput: 5.000 MMBTU/HR

4.850 MCF/HR Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

The permittee shall ensure that emission into the outdoor atmosphere of PM from this boiler occurs in such a manner that the rate of the emission does not exceed 0.4 lb/mmBtu heat input.

Fuel Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that natural gas is the only fuel consumed by this boiler.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this boiler on a monthly basis:

- (a) The hours of operation.
- (b) The amount of natural gas consumed.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this boiler on a monthly basis:

- (a) The hours of operation.
- (b) The amount of natural gas consumed.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all adjustments and tuneups performed on this boiler. These records shall contain, at a minimum, the following for each adjustment/tuneup:





- (a) The date of the tuning procedure.
- (b) The name of the service company and technicians.
- (c) The final operating rate or load.
- (d) The final CO and NOx emission rates.
- (e) The final excess oxygen (O2) rate.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform an adjustment or tuneup on this boiler on an annual basis, in accordance with Condition # 005, Section D (under Source ID 031), of this permit. The adjustment/tuneup shall include, but not be limited to, the following:

- (a) Inspection, adjustment, cleaning, or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation, in accordance with the manufacturer's specifications.
- (b) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx and, to the extent practicable, CO.
- (c) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation, in accordance with the manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

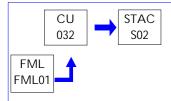
This source consists of a natural gas-fired boiler, model no. 26RJS-100S, manufactured by Fireye Combustion Control. The boiler is rated at 5.0 mmBtu/hr heat input.



Source ID: 032 Source Name: BOILER 2

Source Capacity/Throughput: 5.000 MMBTU/HR

4.850 MCF/HR Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

The permittee shall ensure that emission into the outdoor atmosphere of PM from this boiler occurs in such a manner that the rate of the emission does not exceed 0.4 lb/mmBtu heat input.

Fuel Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that natural gas is the only fuel consumed by this boiler.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this boiler on a monthly basis:

- (a) The hours of operation.
- (b) The amount of natural gas consumed.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this boiler on a monthly basis:

- (a) The hours of operation.
- (b) The amount of natural gas consumed.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all adjustments and tuneups performed on this boiler. These records shall contain, at a minimum, the following for each adjustment/tuneup:



SECTION D.

Source Level Requirements



- (a) The date of the tuning procedure.
- (b) The name of the service company and technicians.
- (c) The final operating rate or load.
- (d) The final CO and NOx emission rates.
- (e) The final excess O2 rate.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform an adjustment or tuneup on this boiler on an annual basis, in accordance with Condition # 005, Section D (under Source ID 032), of this permit. The adjustment/tuneup shall include, but not be limited to, the following:

- (a) Inspection, adjustment, cleaning, or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation, in accordance with the manufacturer's specifications.
- (b) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx and, to the extent practicable, CO.
- (c) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation, in accordance with the manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

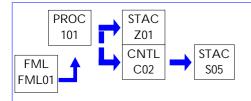
This source consists of a natural gas-fired boiler, model no. 26RJS-100S, manufactured by Fireye Combustion Control. The boiler is rated at 5.0 mmBtu/hr heat input.



Source ID: 101 Source Name: ROLL BAKING LINE (#1)

Source Capacity/Throughput: 2.540 MMBTU/HR

2.470 MCF/HR Natural Gas 5,400.000 Lbs/HR BAKED ROLLS



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of the following pollutants from the oven of this roll baking line occurs in such a manner that the rates of the emission do not exceed any of the following:

Pollutant	Lbs/hr	Tons/yr
СО	0.33	1.45
NOx	0.40	1.75
VOCs	1.21	5.30

Tons/yr = Tons per 12-month rolling period, calculated monthly.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of PM from the oven of this roll baking line occurs in such a manner that the concentration of PM in the exhaust gas does not exceed 0.02 gr/dscf.

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13(c).]

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that natural gas is the only fuel consumed by the oven of this roll baking line.

Control Device Efficiencies Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the catalytic oxidizer (Source ID C02) associated with this roll baking line achieves a minimum 95% VOC destruction efficiency of the captured exhaust gases from the oven of the roll baking line.



II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this roll baking line:

- (a) The hours of operation of the oven on a "for sale day" (i.e., the date that baked product is delivered for sale) basis.
- (b) The amount of natural gas consumed by the oven on a "for sale day" basis.
- (c) The temperature of the fermenting room and proofing box on a continuous basis.
- (d) The humidity of the fermenting room and proofing box on a "for sale day" basis.
- (e) The amount of rolls produced on a "for sale day" basis.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for the dough used in this roll baking line, on a "for sale day" basis, and as altered:

- (a) The amount of initial yeast (pounds).
- (b) The amount of spike yeast (pounds).
- (c) The initial baker's percent of yeast.
- (d) The total yeast action time.
- (e) The final spike baker's percent of yeast.
- (f) The spiking time.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this roll baking line:

- (a) The hours of operation of the oven on a "for sale day" basis.
- (b) The amount of natural gas consumed by the oven on a "for sale day" basis.
- (c) The temperature of the fermenting room and proofing box on a continuous basis.
- (d) The humidity of the fermenting room and proofing box on a "for sale day" basis.
- (e) The amount of rolls produced on a "for sale day" basis.



- (f) The CO emissions from the oven on an average hourly, daily, monthly, and 12-month rolling basis, calculated using a Department-approved method(s).
- (g) The NOx emissions from the oven on an average hourly, daily, monthly, and 12-month rolling basis, calculated using a Department-approved method(s).
- (h) The VOC emissions on an average hourly, "for sale day," monthly, and 12-month rolling basis, calculated using a Department-approved method(s).

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for the dough used in this roll baking line, on a "for sale day" basis, and as altered:

- (a) The amount of initial yeast (pounds).
- (b) The amount of spike yeast (pounds).
- (c) The initial baker's percent of yeast.
- (d) The total yeast action time.
- (e) The final spike baker's percent of yeast.
- (f) The spiking time.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all maintenance inspections for this roll baking line. These records shall contain, at a minimum, the following for each inspection:

- (a) The date and time of the inspection.
- (b) Any maintenance (routine, preventative, or otherwise) performed.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall minimize fugitive VOC emissions from the dough used in this roll baking line by controlling the temperature and humidity of the fermenting room and proofing box. The fermentation temperature shall not exceed 95 °F.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform routine preventative maintenance inspections for this roll baking line, in accordance with the manufacturers' specifications and Condition # 009, Section D (under Source ID 101), of this permit.



012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the following emissions from the oven of this roll baking line on an average hourly, daily, monthly, and 12-month rolling basis, using a Department-approved method(s):

- (a) The CO emissions.
- (b) The NOx emissions.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC emissions from this roll baking line, as follows:

(a) The following equation, obtained from the Alternative Control Technology (ACT) Document for Bakery Oven Emissions (EPA 453/R-92-017), shall be used to calculate the total VOC emissions from the roll baking line:

VOC E.F. = 0.95[Yi] + 0.195[Ti] - 0.51[S] - 0.86[Ts] + 1.90, where:

VOC E.F. = The VOC emission factor (lbs/ton of baked rolls produced).

Yi = The initial baker's percent of yeast (nearest tenth of a percent).

Ti = The total yeast action time (nearest tenth of an hour).

S = The final spike baker's percent of yeast (nearest tenth of a percent).

Ts = The spiking time (nearest tenth of an hour).

- (b) Unless an alternative categorization is approved by the Department, in writing, 90% of the VOC emissions from the roll baking line, as calculated using the equation in (a), above, shall be considered as released in the oven (i.e., while the rolls are baking) and controlled by the associated catalytic oxidizer (Source ID C02), while the other 10% shall be considered as (uncontrolled) fugitive emissions (Source ID Z01) released prior to or subsequent to the oven.
- (c) The VOC destruction efficiency obtained during the most recent stack test in which compliance with Condition # 004, Section D (under Source ID 101), of this permit, was demonstrated shall be used to calculate the non-fugitive VOC emissions from the roll baking line.

VII. ADDITIONAL REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a roll baking line with a maximum production rate of 5,400 lbs/hr baked rolls. The roll baking line is comprised of various equipment and operations, including the following:

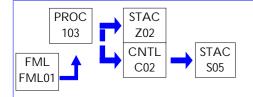
- (a) Mixers.
- (b) A fermenting room.
- (c) A proofing box.
- (d) A slicer.
- (e) A natural gas-fired oven, model type SUPERFLO, manufactured by Chubco. The oven is rated at 2.54 mmBtu/hr heat input and 2,420 scfm exhaust gas flow. Exhaust gases from the oven are ducted to a catalytic oxidizer (Source ID C02) before exhausting into the outdoor atmosphere.



Source ID: 103 Source Name: BREAD BAKING LINE (#3)

Source Capacity/Throughput: 6.707 MMBTU/HR

6.510 MCF/HR Natural Gas
14,040.000 Lbs/HR BAKED BREAD



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of the following pollutants from the oven of this bread baking line occurs in such a manner that the rates of the emission do not exceed any of the following:

Lbs/hr	Tons/yr
0.71	3.11
0.85	3.72
3.11	13.62
	0.71 0.85

Tons/yr = Tons per 12-month rolling period, calculated monthly.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of PM from the oven of this bread baking line occurs in such a manner that the concentration of PM in the exhaust gas does not exceed 0.02 gr/dscf.

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13(c).]

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that natural gas is the only fuel consumed by the oven of this bread baking line.

Control Device Efficiencies Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the catalytic oxidizer (Source ID C02) associated with this bread baking line achieves a minimum 95% VOC destruction efficiency of the captured exhaust gases from the oven of the bread baking line.



II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this bread baking line:

- (a) The hours of operation of the oven on a "for sale day" basis.
- (b) The amount of natural gas consumed by the oven on a "for sale day" basis.
- (c) The temperature of the fermenting room and proofing box on a continuous basis.
- (d) The humidity of the fermenting room and proofing box on a "for sale day" basis.
- (e) The amount of bread produced on a "for sale day" basis.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for the dough used in this bread baking line, on a "for sale day" basis, and as altered:

- (a) The amount of initial yeast (pounds).
- (b) The amount of spike yeast (pounds).
- (c) The initial baker's percent of yeast.
- (d) The total yeast action time.
- (e) The final spike baker's percent of yeast.
- (f) The spiking time.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this bread baking line:

- (a) The hours of operation of the oven on a "for sale day" basis.
- (b) The amount of natural gas consumed by the oven on a "for sale day" basis.
- (c) The temperature of the fermenting room and proofing box on a continuous basis.
- (d) The humidity of the fermenting room and proofing box on a "for sale day" basis.
- (e) The amount of bread produced on a "for sale day" basis.



- (f) The CO emissions from the oven on an average hourly, daily, monthly, and 12-month rolling basis, calculated using a Department-approved method(s).
- (g) The NOx emissions from the oven on an average hourly, daily, monthly, and 12-month rolling basis, calculated using a Department-approved method(s).
- (h) The VOC emissions on an average hourly, "for sale day," monthly, and 12-month rolling basis, calculated using a Department-approved method(s).

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for the dough used in this bread baking line, on a "for sale day" basis, and as altered:

- (a) The amount of initial yeast (pounds).
- (b) The amount of spike yeast (pounds).
- (c) The initial baker's percent of yeast.
- (d) The total yeast action time.
- (e) The final spike baker's percent of yeast.
- (f) The spiking time.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all maintenance inspections for this bread baking line. These records shall contain, at a minimum, the following for each inspection:

- (a) The date and time of the inspection.
- (b) Any maintenance (routine, preventative, or otherwise) performed.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall minimize fugitive VOC emissions from the dough used in this bread baking line by controlling the temperature and humidity of the fermenting room and proofing box. The fermentation temperature shall not exceed 95 °F.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform routine preventative maintenance inspections for this bread baking line, in accordance with the manufacturers' specifications and Condition # 009, Section D (under Source ID 103), of this permit.



012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the following emissions from the oven of this bread baking line on an average hourly, daily, monthly, and 12-month rolling basis, using a Department-approved method(s):

- (a) The CO emissions.
- (b) The NOx emissions.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC emissions from this bread baking line, as follows:

(a) The following equation, obtained from the ACT Document for Bakery Oven Emissions (EPA 453/R-92-017), shall be used to calculate the total VOC emissions from the bread baking line:

VOC E.F. = 0.95[Yi] + 0.195[Ti] - 0.51[S] - 0.86[Ts] + 1.90, where:

VOC E.F. = The VOC emission factor (lbs/ton of baked bread produced).

Yi = The initial baker's percent of yeast (nearest tenth of a percent).

Ti = The total yeast action time (nearest tenth of an hour).

S = The final spike baker's percent of yeast (nearest tenth of a percent).

Ts = The spiking time (nearest tenth of an hour).

- (b) Unless an alternative categorization is approved by the Department, in writing, 90% of the VOC emissions from the bread baking line, as calculated using the equation in (a), above, shall be considered as released in the oven (i.e., while the bread is baking) and controlled by the associated catalytic oxidizer (Source ID C02), while the other 10% shall be considered as (uncontrolled) fugitive emissions (Source ID Z02) released prior to or subsequent to the oven.
- (c) The VOC destruction efficiency obtained during the most recent stack test in which compliance with Condition # 004, Section D (under Source ID 103), of this permit, was demonstrated shall be used to calculate the non-fugitive VOC emissions from the bread baking line.

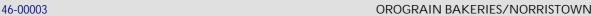
VII. ADDITIONAL REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

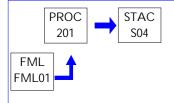
This source consists of a bread baking line with a maximum production rate of 14,040 lbs/hr baked bread. The bread baking line is comprised of various equipment and operations, including the following:

- (a) Mixers.
- (b) A fermenting room.
- (c) A proofing box.
- (d) A slicer.
- (e) A natural gas-fired oven, model type 970, manufactured by Baker Perkins, Inc. The oven is rated at 6.707 mmBtu/hr heat input and 4,670 scfm exhaust gas flow. Exhaust gases from the oven are ducted to a catalytic oxidizer (Source ID C02) before exhausting into the outdoor atmosphere.



Source ID: 201 Source Name: EMERGENCY GENERATOR

> Source Capacity/Throughput: 0.583 MCF/HR Natural Gas



RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee shall ensure that emission into the outdoor atmosphere of PM from this emergency generator occurs in such a manner that the concentration of PM in the exhaust gas does not exceed 0.04 gr/dscf.

Fuel Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that natural gas is the only fuel consumed by this emergency generator.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the total operating time of this emergency generator does not exceed 500 hours in any consecutive 12-month period.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this emergency generator on a monthly basis:

- (a) The hours of operation.
- (b) The amount of natural gas consumed.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this emergency generator:

(a) The hours of operation on a monthly basis.



(b) The amount of natural gas consumed on a monthly and 12-month rolling basis.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

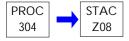
Operating permit terms and conditions.

This source consists of a natural gas-fired emergency generator, model no. 30EK-5DRB, manufactured by Onan. The emergency generator is rated at 30 ekW power output.



Source ID: 304 Source Name: INK JET PRINTERS (11)

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that emission into the outdoor atmosphere of VOCs from these ink jet printers occurs in such a manner that the rate of the emission does not exceed 2.7 tons/yr, calculated monthly as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for these ink jet printers:

- (a) The hours of operation on a weekly basis.
- (b) The amount of as applied ink used (gallons and pounds) on a weekly basis.
- (c) The amount of thinner used (gallons and pounds) on a weekly basis.
- (d) The amount of thinner disposed of in closed containers on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for these ink jet printers:

- (a) The hours of operation on a weekly basis.
- (b) The amount of as applied ink used (gallons and pounds) on a weekly basis.
- (c) The composition of the ink.
- (d) The VOC content of the ink (lbs/gal).
- (e) The amount of thinner used (gallons and pounds) on a weekly basis.
- (f) The VOC content of the thinner (lbs/gal).
- (g) The amount of thinner disposed of in closed containers on a monthly basis.





V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the VOC content of the ink and thinner used in these ink jet printers does not exceed 5.9 lbs/gal and 6.7 lbs/gal, respectively.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that when these ink jet printers are cleaned, the thinner used is collected in closed containers and disposed of off-site.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source grouping consists of eleven (11) ink jet printers manufactured by Imaje, as follows:

Model No.	Quantity
Jaime 1000S8	1
9040	10

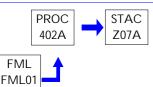




Source ID: 402A Source Name: AIR HEATERS (32)

Source Capacity/Throughput: 14.404 MMBTU/HR

13.980 MCF/HR Natural Gas



RESTRICTIONS.

Fuel Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that natural gas is the only fuel consumed by each of these heaters.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of fuel consumed by these heaters on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the amount of fuel consumed by these heaters on a monthly basis, calculated using a Department-approved method(s).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source grouping consists of 32 natural gas-fired air heaters, as follows:

Manufacturer Model No. Type Rated Heat Input Quantity

Dayton Electric Mfg. Co. 3E367E Space Heater 45 mBtu/hr 1



Dayton Electric Mfg. Co.	3E375B	Space Heater	250 mBtu/hr	14	
Greenheck Fan Corp.	DGX-118-H32-D8	Make-up Air	784.1 mBtu/hr	1	
Greenheck Fan Corp.	TSU-118-H30-D8	Make-up Air	825 mBtu/hr	2	
Lennox International, Inc.	GCS16-072-160-1Y	HVAC	160 mBtu/hr	1	
Reznor	UDAP150	Space Heater	150 mBtu/hr	2	
Reznor	UDAP175	Space Heater	175 mBtu/hr	2	
Trane	GPNC040ADA10000	Space Heater	400 mBtu/hr	1	
Trane	YSC120A4EMA14D	HVAC	160 mBtu/hr	4	
Trane	YSC120A4EMA15D	HVAC	160 mBtu/hr	1	
Weather-Rite, LLC	TT224 HBI	Make-up Air	2138.4 mBtu/hr	3	
			14.4043 mmBtu/hr	32	

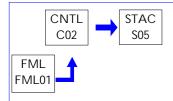
SECTION D.



Source Level Requirements

Source ID: C02 Source Name: CSM CATALYTIC OXIDIZER

Source Capacity/Throughput: 2.910 MCF/HR Natural Gas



RESTRICTIONS.

Control Device Efficiencies Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

- (a) The permittee shall ensure that this catalytic oxidizer achieves 100% capture of the exhaust gas flow from the ovens of the roll and bread baking lines (Source IDs 101 and 103, respectively), with a minimum VOC destruction efficiency of 95%.
- (b) The permittee shall not operate the ovens of the roll and bread baking lines (Source IDs 101 and 103, respectively) unless the exhaust gas flow from the ovens are routed to this catalytic oxidizer.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

- (a) Within 12 months prior to the expiration date of this permit, or if the catalyst is replaced, the permittee shall perform a VOC emission stack test for this catalytic oxidizer, as follows:
 - (1) In accordance with the provisions of 25 Pa. Code Chapter 139.
- (2) At the inlet and outlet of the catalytic oxidizer to demonstrate compliance with the VOC destruction efficiency restriction specified in Condition # 001(a), Section D (under Source ID C02), of this permit.
- (3) While the roll and bread baking lines (Source IDs 101 and 103, respectively) are operating at normal production capacities, such that the test results are representative of normal operations.
- (b) At least sixty (60) days prior to the test, the permittee shall submit, to the Department for approval, the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples. The permittee shall also submit records of production for the roll and bread baking lines for the previous 2 calendar months to establish the normal production capacities referred to in (a)(3), above. A test protocol shall be approved by the Source Testing Section of the Department prior to the test.
- (c) At least 30 days prior to the test, the permittee shall inform the Regional Air Quality Manager of the date(s) and time(s) of the test.
- (d) Within 30 days after the test, but no later than 6 months prior to the expiration date of this permit, the permittee shall submit two copies of the complete test report, including all operating conditions, to the Regional Air Quality Manager for approval.



003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

Between stack tests, the permittee shall sample the catalyst used in this catalytic oxidizer on an annual basis, using a method(s) approved by the Department, to assure that the catalyst has not been poisoned or become deteriorated. The results of the test(s) shall be made available to the Department upon request.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall monitor the inlet and outlet temperature of this catalytic oxidizer on a continuous basis.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall maintain records of the inlet and outlet temperature of this catalytic oxidizer on a continuous basis.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall maintain records of all maintenance inspections for this catalytic oxidizer. These records shall contain, at a minimum, the following for each inspection:

- (a) The date and time of the inspection.
- (b) Any maintenance (routine, preventative, or otherwise) performed.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that, before and at all times while operating the ovens of the roll and/or bread baking lines (Source IDs 101 and 103, respectively), this catalytic oxidizer is operated at a minimum inlet temperature of 660 °F.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the total air flow to this catalytic oxidizer does not exceed 8,500 scfm at any time.





009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall perform routine preventative maintenance inspections for this catalytic oxidizer, in accordance with the manufacturers' specifications and Condition # 006, Section D (under Source ID C02), of this permit.

VII. ADDITIONAL REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a natural gas-fired catalytic oxidizer manufactured by CSM Worldwide, Inc., model no. 85A, manufactured by CSM Worldwide, Inc. The catalytic oxidizer is rated at 3.00 mmBtu/hr heat input and 8,500 scfm exhaust gas flow, and is equipped with an air-to-air heat exchanger, model type/no. Kalex 223-11W, also manufactured by CSM Worldwide, Inc. Exhaust emissions from the ovens of the roll and bread baking lines (Source IDs 101 and 103, respectively) are ducted to the catalytic oxidizer.





SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





SECTION F. Emission Restriction Summary.

Source tu	Source Description	ווע		
031	BOILER 1			
Emission Lin	nit		Pollutant	
0.4	100 Lbs/MMBTU	Heat Input	TSP	
032	BOILER 2			

Emis	ssion Limit			Pollutant
	0.400	Lbs/MMBTU	Heat Input	TSP

101	ROLL BAKING LINE (#1)
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Emission Limit			Pollutant
0.330	Lbs/Hr		CO
1.450	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	CO
0.400	Lbs/Hr		NOX
1.750	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	NOX
0.020	gr/DRY FT3		TSP
1.210	Lbs/Hr		VOC
5.300	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC

103 BREAD BAKING LINE (#3)

Emission Limit			Pollutant
0.710	Lbs/Hr		CO
3.110	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	CO
0.850	Lbs/Hr		NOX
3.720	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	NOX
0.020	gr/DRY FT3		TSP
3.110	Lbs/Hr		VOC
13.620	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC

201 EMERGENCY GENERATOR

EIIII331011 EIIIIIt	Polititarit
0.040 gr/DRY FT3	TSP

304 INK JET PRINTERS (11)

Emission Limit			Pollutant	
2.700	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC	

Site Emission Restriction Summary

Emission Limit		Pollutant	
25.000 Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC	



SECTION F. Emission Restriction Summary.

DEP Auth ID: 826606



SECTION G. Miscellaneous.

- (a) The plant address is: 1810 E. Ridge Pike, Norristown, PA 19404.
- (b) The following previously-issued documents serve as the basis for certain terms and conditions set forth in this permit:
 - (1) Reasonably Available Control Technology (RACT) Operating Permit No. OP-46-0003.
 - (2) Plan Approval No. 46-0003A.
- (c) The following sources have been determined by the Department to be insignificant sources of air emissions and therefore do not require additional restrictions, monitoring, or recordkeeping. They are still subject to any applicable federal, state, and local regulations, including those indicated in Section C, of this permit:
 - (1) Air conditioning units.
 - (2) Two natural gas-fired hot water heaters manufactured by Bradford White Corp., as follows:

Model No.	Rated Heat Input
M-I-3085LN8 M-I-30T5LN10	30 mBtu/hr 32 mBtu/hr
	62 mBtu/hr

- (3) Different types of portable fire extinguishers.
- (4) Forklifts.
- (5) Maintenance activities, including painting (formerly Source ID 302).
- (6) Office equipment (i.e., copiers, fax machines, computers, printers not included elsewhere in this permit, etc.).
- (7) Waste oil tanks.
- (8) Vegetable oil tank.
- (9) Flour silos (6).
- (10) Dust collectors associated with (c)(9), above.
- (11) Two aqueous (i.e., non-VOC) parts cleaners.
- (d) This permit is an Administrative Amendment to State Only Operating Permit No. 46-00003, originally issued on December 7, 2009 (APS ID 345950, Auth ID 743384)¹. The following is a listing of the changes reflected in this permit (APS ID 715219, Auth ID 826606):
 - (1) The tax ID/plant code has been changed to 14-0677530-3.
 - (2) The owner name has been changed to Orograin Bakeries Manufacturing, Inc.
 - (3) The plant name has been changed to Orograin Bakeries.

¹ The permit was originally issued as Title V Operating Permit No. 46-00003 on May 21, 1998 (APS ID 345950, Auth ID 354756), and previously renewed/amended on February 2, 2004 (APS ID 345950, Auth ID 495645).





SECTION G. Miscellaneous.

- (4) The following for Condition # 011, Section C, of the original permit (same condition number in this permit):
- (i) The frequency of monitoring indicated in Sub-condition (a) has been changed from at least once per month to once per operating day.
- (ii) Statements that, at the end of 6 months, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to weekly and monthly, have been added as Sub-conditions (c) and (d), respectively.
 - (5) Conditions # 018 and 020, Section C, of the original permit, have been removed.
- (6) The restriction type for Condition # 002, Section D (under Source ID 201), of the original permit (same condition number in this permit), has been corrected from an operating hours restriction to a fuel restriction.
- (7) Condition # 002, Section D (under Source ID 304), of the original permit, has been moved from Sub-section I (as a throughput restriction) to Sub-section VI (as Condition # 004, Section D (under Source ID 304), of this permit).
- (8) Condition # 002, Section D (under Source ID C02), of the original permit, has been moved from Sub-section I (as a control device efficiency restriction) to Sub-section VI (as Condition # 008, Section D (under Source ID C02), of this permit).



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***** End of Report *****