



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM**

TITLE V/STATE OPERATING PERMIT

Issue Date: March 3, 2025

Effective Date: March 3, 2025

Expiration Date: March 2, 2030

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 applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 15-00104

Federal Tax Id - Plant Code: 23-2847100-1

Owner Information

Name: FLOWERS BAKING CO OF OXFORD, INC
Mailing Address: 700 LINCOLN ST
OXFORD, PA 19363-1529

Plant Information

Plant: FLOWERS BAKING CO/OXFORD PLT
Location: 15 Chester County 15806 Oxford Borough
SIC Code: 2051 Manufacturing - Bread, Cake, And Related Products

Responsible Official

Name: MIKE PANZER
Title: PLANT MNGR
Phone: (610) 932 - 2300 Email: michael.panzer@flocorp.com

Permit Contact Person

Name: PHILLIPS MICHAEL
Title: REG SAFETY & ENV MGR
Phone: (757) 650 - 6975 Email: michael.phillips@flocorp.com

[Signature] _____
JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General Title V Requirements

- #001 Definitions
- #002 Prohibition of Air Pollution
- #003 Property Rights
- #004 Permit Expiration
- #005 Permit Renewal
- #006 Transfer of Ownership or Operational Control
- #007 Inspection and Entry
- #008 Compliance Requirements
- #009 Need to Halt or Reduce Activity Not a Defense
- #010 Duty to Provide Information
- #011 Reopening and Revising the Title V Permit for Cause
- #012 Reopening a Title V Permit for Cause by EPA
- #013 Operating Permit Application Review by the EPA
- #014 Significant Operating Permit Modifications
- #015 Minor Operating Permit Modifications
- #016 Administrative Operating Permit Amendments
- #017 Severability Clause
- #018 Fee Payment
- #019 Authorization for De Minimis Emission Increases
- #020 Reactivation of Sources
- #021 Circumvention
- #022 Submissions
- #023 Sampling, Testing and Monitoring Procedures
- #024 Recordkeeping Requirements
- #025 Reporting Requirements
- #026 Compliance Certification
- #027 Operational Flexibility
- #028 Risk Management
- #029 Approved Economic Incentives and Emission Trading Programs
- #030 Permit Shield
- #031 Reporting
- #032 Report Format

Section C. Site Level Title V 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 Title V Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements



SECTION A. Table of Contents

D-VI: Work Practice Standards
D-VII: Additional Requirements

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

Section E. Source Group Restrictions

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

Section F. Alternative Operating Scenario(s)

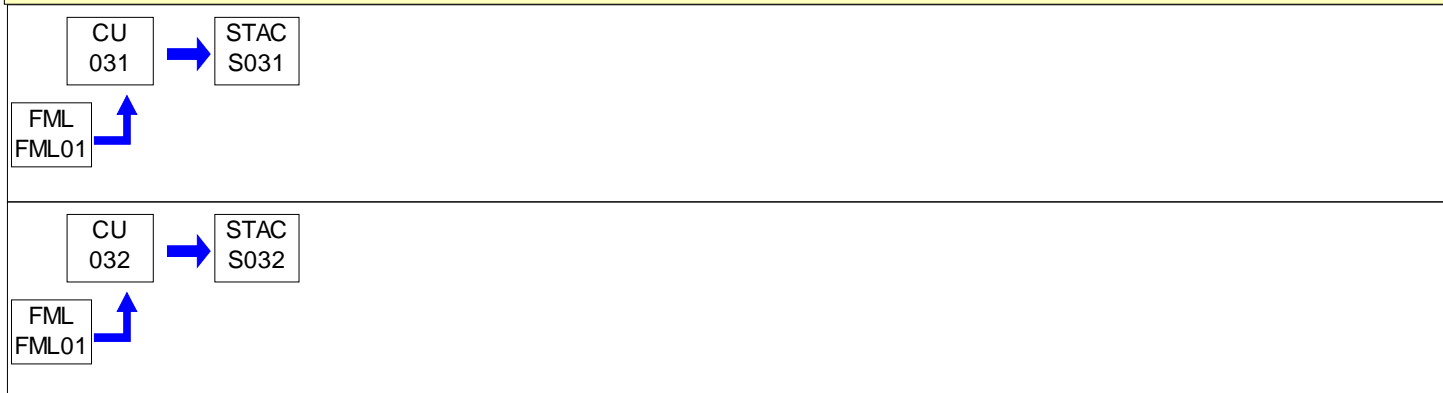
F-I: Restrictions
F-II: Testing Requirements
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

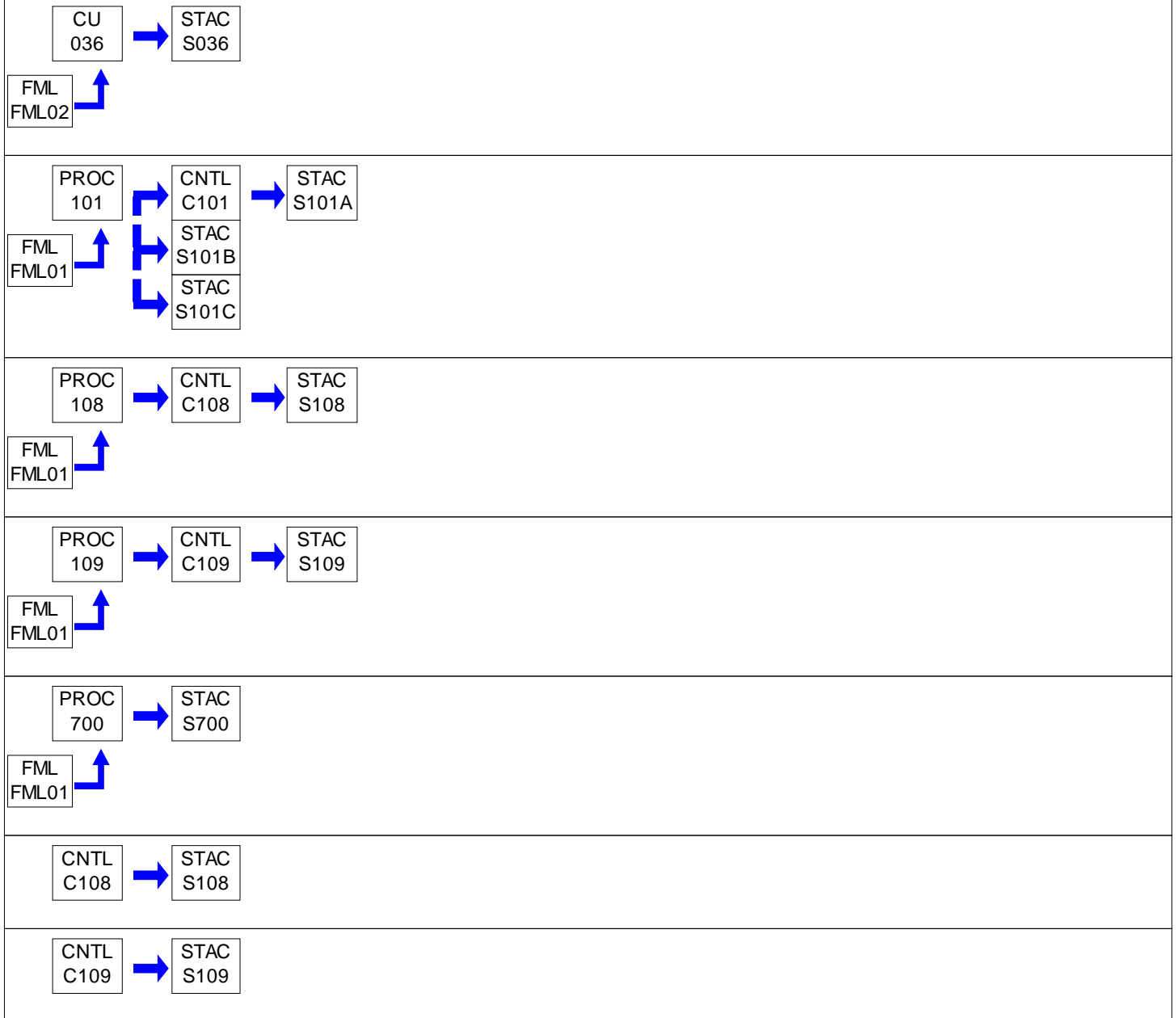
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	CLAYTON BOILER	6.300 MMBTU/HR	
		6,117.000 CF/HR	NATURAL GAS
032	MISC COMBUSTION SOURCES	11,283.000 CF/HR	NATURAL GAS
036	CATERPILLAR FIRE PUMP	1.380 MMBTU/HR	
		10.100 Gal/HR	#2 OIL
101	LINE 1 FRYER	1.720 MMBTU/HR	
		1,670.000 CF/HR	NATURAL GAS
		1.000 Tons/HR	YEAST AND NON-YEAST F
108	LINE 7 OVEN	9.000 Tons/HR	LOAF BREAD
		10,485.000 CF/HR	Natural Gas
109	AMF BUN LINE	7,136.000 CF/HR	Natural Gas
		5.200 Tons/HR	BREAD BUNS
700	60 KW EMERGENCY GENERATOR	0.814 MMBTU/HR	
		790.000 CF/HR	Natural Gas
C101	LINE 1 MIST ELIMINATOR		
C108	CSM CATALYTIC OXIDIZER	970.870 CF/HR	Natural Gas
C109	CSM 34A CATALYTIC OXIDIZER	970.870 CF/HR	Natural Gas
FML01	NATURAL GAS		
FML02	NO. 2 FUEL OIL		
S031	CLAYTON BOILER STACK		
S032	MISC COMBUSTION STACKS		
S036	FIRE PUMP STACK		
S101A	LINE 1 FRYER STACK		
S101B	LINE 1 FRONT COMBUSTION STACK		
S101C	LINE 1 BACK COMBUSTION STACK		
S108	LINE 7 OVEN STACK		
S109	AMF BUN LINE STACK		
S700	60 KW EMER GEN STACK		

PERMIT MAPS



PERMIT MAPS



**SECTION B. General Title V Requirements****#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 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the act.

#003 [25 Pa. Code § 127.512(c)(4)]**Property Rights**

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

#004 [25 Pa. Code § 127.446(a) and (c)]**Permit Expiration**

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. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V 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. 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.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]**Permit Renewal**

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(c) 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. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) 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 during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]**Transfer of Ownership or Operational Control**

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

- (1) The Department determines that no other change in the permit is necessary;
- (2) 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,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by

**SECTION B. General Title V Requirements**

the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]**Inspection and Entry**

(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:

- (1) Enter at reasonable times upon the permittee's premises where a Title V 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 or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, 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, 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.

(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.

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]**Compliance Requirements**

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) 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 to the source are 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 Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]**Need to Halt or Reduce Activity Not a Defense**

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

**SECTION B. General Title V Requirements****#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]****Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]**Reopening and Revising the Title V Permit for Cause**

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]**Reopening a Title V Permit for Cause by EPA**

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#013 [25 Pa. Code § 127.522(a)]**Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**SECTION B. General Title V Requirements****#014 [25 Pa. Code § 127.541]****Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]**Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]**Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]**Severability Clause**

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

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]**Fee Payment**

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

**SECTION B. General Title V Requirements**

(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

(e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.

(1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.

(2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.

(3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#019 [25 Pa. Code §§ 127.14(b) & 127.449]**Authorization for De Minimis Emission Increases**

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. 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.

The Department may disapprove or condition de minimis emission increases at any time.

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit 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 NO_x from a single source during the term of the permit and 5 tons of NO_x 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 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 or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

(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.

**SECTION B. General Title V Requirements**

(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, liquefied petroleum gas 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.

(d) 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 (b)(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 the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(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 allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical 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.

#020 [25 Pa. Code §§ 127.11a & 127.215]**Reactivation of Sources**

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(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 satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#021 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the

**SECTION B. General Title V Requirements**

phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) 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 this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]**Submissions**

(a) 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 on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]**Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code §§ 127.511 & Chapter 135]**Recordkeeping Requirements**

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

- (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.

**SECTION B. General Title V Requirements**

(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 the 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. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]**Reporting Requirements**

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]**Compliance Certification**

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

**SECTION B. General Title V Requirements****#027 [25 Pa. Code § 127.3]****Operational Flexibility**

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

- (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 amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]**Risk Management**

(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 CFR 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 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency 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 under § 68.130; or,
 - (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 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 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 the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

**SECTION B. General Title V Requirements**

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]**Approved Economic Incentives and Emission Trading Programs**

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]**Permit Shield**

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#031 [25 Pa. Code §135.3]**Reporting**

(a) The permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#032 [25 Pa. Code §135.4]**Report Format**

Emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

**SECTION C. Site Level Requirements****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 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 25 Pa. Code § 129.14; and,
- (g) Sources and classes of sources other than those identified in (a) - (f), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution; and
 - (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**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]**Limitations**

The permittee may not 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 on which the source is being operated.

005 [25 Pa. Code §123.41]**Limitations**

The permittee may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

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

006 [25 Pa. Code §123.42]**Exceptions**

The opacity limitations as per 25 Pa. Code § 123.41 shall not apply to a visible emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure to meet the limitations.

**SECTION C. Site Level Requirements**

(b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

(c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.218(g)(1)]

(a) Annual combined VOC emissions, from all emissions units or groups of emissions units at this facility, shall not exceed 41.7 tons per year expressed as a 12-month rolling total.

(b) Emissions generated from startups, shutdowns, and malfunctions of all emissions units or group of emissions units at this facility shall be included in the 41.7 tons per year PAL for VOC.

(c) Compliance with the emission limit in paragraph (b), above, ensures compliance with the VOC RACT limit established under Condition No.6 of RACT Operating Permit No. OP-15-0104 (as issued on May 12, 2004), for Source ID 101 (Production Line No. 1).

008 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.218(g)(10)]

The emissions from any new source, that requires a Plan Approval, shall be the minimum attainable through the use of Best Available Technology (BAT). A physical change or change in method of operation at an existing emissions unit will not be subject to BAT requirements of 25 Pa. Code Chapter 127 unless the emissions unit is modified so that the fixed capital cost of new components exceeds fifty percent of the fixed capital cost that would be required to construct a comparable entirely new emissions unit.

009 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.218(d)]

At no time during or after the PAL effective period are emissions reductions of the PAL pollutant, which occur during the PAL effective period, creditable as decreases for purposes of offsets under 25 Pa. Code Chapter 127 unless the level of the PAL is reduced by the amount of the emissions reductions and the reductions would be creditable in the absence of the PAL.

010 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.218(l)]

(a) The Department may increase a PAL emissions limitation during the PAL effective period if the permittee complies with the following:

(1) The permittee shall submit a complete application to request an increase in the PAL limit for a PAL major modification. The application must identify the emissions units contributing to the increase in emissions that cause the facility's emissions to equal or exceed its PAL.

(2) The permittee shall demonstrate that the sum of the baseline actual emissions of the small emissions units assuming application of BAT, plus the sum of the baseline actual emissions of the significant and major emissions units assuming application of BACT equivalent controls, plus the sum of the allowable emissions of the new or modified emissions units exceeds the PAL. The level of control that would result from BAT or BACT equivalent controls on each small emissions unit, significant emissions unit or major emissions unit must be determined by conducting a new BAT or BACT analysis at the time the application is submitted unless the emissions unit is

**SECTION C. Site Level Requirements**

currently required to comply with a BAT, BACT or LAER requirement that was established within the preceding 10 years. In this case, the assumed control level for that emissions unit is equal to the level of BAT, BACT or LAER with which that emissions unit must currently comply.

(3) The permittee shall obtain a major NSR permit for all emissions units identified in subparagraph (a)(1) above, regardless of the magnitude of the emissions increase resulting from them. The permittee shall comply with the applicable emissions requirements of 25 Pa. Code Section 127.218, even if the units are subject to a PAL or continue to be subject to a PAL.

(4) The PAL permit must require that the increased PAL level be effective on the day any emissions unit that is part of the PAL major modification becomes operational and begins to emit the PAL pollutant.

(b) The Department will calculate the new PAL as the sum of the allowable emissions for each modified or new emissions unit, plus the sum of the baseline actual emissions of the significant and major emissions units assuming application of BACT equivalent controls determined in accordance with subparagraph (a)(2) above, plus the sum of the baseline actual emissions of the small emissions units.

(c) The PAL permit must be revised to reflect the increased PAL level under the public notice requirements of 25 Pa. Code Section 127.218(e).

011 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.218(g)(5) and 127.218(j)]

A PAL permit which expires or is not renewed in accordance with the procedures in 25 Pa. Code Section 127.218(k) expires at the end of the PAL effective period and the following requirements apply:

(a) The permittee shall comply with the allowable emissions limitation for each emissions unit or each group of emissions unit under the PAL under a revised permit established according to the following procedures:

(1) Within the time frame specified for PAL permit renewals in 25 Pa. Code Section 127.218(k)(2), the permittee shall submit a proposed allowable emissions limitation for each emissions unit, or each group of emissions units if this distribution of allowable emissions is more appropriate as determined by the Department, by distributing the PAL allowable emissions for the facility among each of the emissions units that existed under the PAL permit. If the PAL permit has not been adjusted for an applicable requirement that became effective during the PAL effective period, as required under 25 Pa. Code Section 127.218(k)(5), this distribution is made as if the PAL permit has been adjusted.

(2) The Department will decide whether and how to distribute the PAL allowable emissions and issue a revised PAL permit incorporating allowable limits for each emissions unit or each group of emissions units.

(b) The permittee shall comply with the allowable emissions limitation for each emissions unit or group of emissions units on a 12-month rolling basis. The Department may approve the use of emissions monitoring systems other than CEMS, CERMS, PEMS or CPMS to demonstrate compliance with the allowable emissions limitation.

(c) Until the Department issues the revised PAL permit incorporating the allowable limits for each emissions unit or group of emissions units required under subparagraph (a)(1) above, the permittee shall continue to comply with a facility-wide, multi-unit emissions cap equivalent to the level of the PAL emissions limitation.

(d) A physical change or change in the method of operation at this facility is subject to 25 Pa. Code Section 127.218 if the change meets the definition of major modification.

(e) The permittee shall continue to comply with any State or Federal applicable requirements including BAT, BACT, RACT or NSPS that may have applied either during the PAL effective period or prior to the PAL effective period except for those emissions limitations that had been established under 25 Pa. Code Section 127.203(e)(2), but were eliminated by the PAL

**SECTION C. Site Level Requirements**

in accordance with the provisions in 25 Pa. Code Section 127.218(a)(3)(iii).

012 [25 Pa. Code §129.14]**Open burning operations**

The permittee may not permit the open burning of material in the Southeast Air Basin, except when the open burning results from:

- (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 in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.
- (g) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.**# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations 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 conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, 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.

014 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The following applies whenever the permittee is required to submit stack test protocols, stack test reports, notifications pertaining to such stack testing, or any other related documents:

- (a) The permittee shall submit an electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (mail and email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.
- (b) The following pertinent information shall be listed on the title page.
 - (1) Test Date(s)
 - (i) For protocols, provide the proposed date on which testing will commence or "TBD"

**SECTION C. Site Level Requirements**

(ii) For reports, provide the first and last day of testing

(2) Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF Id under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

(3) Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment.

(4) Testing Requirements (all that apply)

- (i) Plan approval number(s)
- (ii) Operating permit number
- (iii) Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- (iv) Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) Eliminate shading, color ink for data emphasis, small font size, and color saturation as the scanning to create an electronic file is done in black and white. Shading and color emphasis do not scan well and make the electronic copies difficult to read.

(d) Email all electronic submissions to both the PSIMS Administrator in Central Office and the Air Quality Program Manager for the Southeast Regional Office. Email addresses are provided below:

Central Office
RA-EPstacktesting@pa.gov

Southeast Region
RA-EPSEstacktesting@pa.gov

(e) The Department limits emails to 15 MB and PSIMS has a file size limitation of 100 MB for electronic files. Submit just one electronic file (convert any Microsoft Word or Excel files to an Adobe PDF format and combine them with the report or protocol), unless the submission contains CONFIDENTIAL information.

(f) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

III. MONITORING REQUIREMENTS.**# 015 [25 Pa. Code §123.43]****Measuring techniques**

Visible 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.

016 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.218(g)(7) and 127.218(m)]

The permittee shall comply with the requirements of 25 Pa. Code § 127.218(m). The following PAL monitoring requirements apply to this facility:

- (a) The permittee shall maintain all necessary production data, fuel usage, and hours of operation (as necessary) to accurately determine plantwide emissions of VOC on a monthly basis and as a 12-month rolling sum:

**SECTION C. Site Level Requirements**

- (1) For all combustion sources, fuel usage shall be monitored monthly, at a minimum, by means of a fuel gauge.
 - (2) For Source ID 036 (fire pump), hours of operation shall be monitored monthly, at a minimum, by means of an hour meter, or by manual observation, performed on a daily basis.
 - (3) For the fryer, both the production rate and fuel usage shall be monitored on a monthly basis, at a minimum. The production rate shall be monitored electronically. The fuel usage rate shall be monitored by a fuel gauge. For yeast based products, the permittee shall monitor the initial baker's percent of yeast, the total yeast action time, the final spike baker's percent of yeast, and the spiking time.
 - (4) For the ovens, fuel usage shall be monitored monthly, at a minimum, by means of a fuel gauge. If yeast based products are produced, the permittee shall monitor for each type of product:
 - (i) The production rate for each month, by electronic means; and,
 - (ii) The initial baker's percent of yeast, the total yeast action time, the final spike baker's percent of yeast, and the spiking time.
 - (5) For the catalytic oxidizers, fuel usage shall be monitored monthly, at a minimum, by means of a fuel gauge.
 - (6) For processes that utilize natural gas (i.e. infrared space heaters), fuel usage shall be monitored monthly, at a minimum, by means of a fuel gauge.
 - (7) For sources that utilize inks and solvents, ink and solvent usage shall be monitored monthly, at a minimum. VOC emissions shall be determined by mass balancing.
- (b) Failure to use an approved monitoring system that meets the requirements of 25 Pa. Code § 127.218(m) renders the PAL permit invalid.
- (c) A permittee using mass balance calculations to monitor PAL pollutant emissions from activities using coating or solvents shall meet the following requirements:
- (1) The permittee shall provide a demonstrated means of validating the published content of the PAL pollutant that is contained in or created by all materials used in or at the emissions unit.
 - (2) The permittee shall assume that the emissions unit emits all of the PAL pollutant that is contained in or created by any raw material or fuel used in or at the emissions unit, if it cannot otherwise be accounted for in the process.
 - (3) If the vendor of a material or fuel used in or at the emissions unit publishes a range of pollutant content from the material, the permittee shall use the highest value of the range to calculate the PAL pollutant emissions unless the Department determines, in writing, that there is site-specific data or a site-specific monitoring program to support another content within the range.
- (d) A permittee using a Continuous Parameter Monitoring System (CPMS) or Predictive Emissions Monitoring System (PEMS) to monitor PAL pollutant emissions shall meet the following requirements:
- (1) The CPMS or PEMS must be calibrated based on current site-specific data demonstrating a correlation between the monitored parameters and the PAL pollutant emissions across the range of operation of the emissions unit.
 - (2) Each CPMS or PEMS must sample, analyze and record data at least every 15 minutes or other less frequent interval approved in writing by the Department, while the emissions unit is operating.
- (e) A permittee using emission factors to monitor PAL pollutant emissions shall:
- (1) Adjust the emission factors to account for the degree of uncertainty or limitations in the development of the

**SECTION C. Site Level Requirements**

factors.

(2) Operate the emissions unit within the designated range of use for the emission factor, if applicable.

(3) Conduct validation testing to determine a site-specific emission factor within 6 months of PAL permit issuance, unless the Department determines, in writing, that testing is not required.

(f) The permittee shall record and report maximum potential emissions without considering enforceable emissions limitations or operational restrictions for an emissions unit during a period of time that there is no monitoring data, unless another method for determining emissions during these periods is specified in the PAL permit.

(g) If the permittee of an emissions unit cannot demonstrate a correlation between the monitored parameters and the PAL pollutant emissions rate at the operating points of the emissions unit, the Department will, at the time of permit issuance, either:

(1) Establish default values for determining compliance with the PAL permit based on the highest potential emissions reasonably estimated at the operating points.

(2) Determine that operation of the emissions unit during operating conditions when there is no correlation between monitored parameters and the PAL pollutant emissions is a violation of the PAL permit.

(h) Data used to establish the PAL must be revalidated through performance testing or other scientifically valid means approved in writing by the Department. This testing must occur at least once every 5 years after issuance of the PAL permit.

017 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

(a) The permittee shall monitor the facility, once per operating day, for the following:

- (1) Odors which may be objectionable (as per 25 Pa. Code §123.31).
- (2) Visible Emissions (as per 25 Pa. Code §§123.41 and 123.42).
- (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:

- (1) Be investigated;
- (2) Be reported to the facility management, or individual(s) designated by the permittee;
- (3) Have appropriate corrective action taken (for emissions that originate on-site); and
- (4) Be recorded in a permanent written log.

(c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.

(d) After six (6) months of weekly monitoring, and 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 the compliance certification, complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.**# 018 [25 Pa. Code §127.218.]****PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.218(g)(6) and 127.218(n)]

**SECTION C. Site Level Requirements**

The following are the approved calculation procedures that the permittee shall use to convert the monitoring system data to monthly emissions and annual emissions (based on a 12-month rolling total) for each month as required by 25 Pa. Code § 127.218(n):

- (a) For all combustion sources at this facility, VOC emissions shall be calculated using the appropriate emission factor from EPA's Compilation of Air Pollutant Emission Factors (AP-42), Section 1.4, and fuel usage records.
- (b) For Source ID 036 (fire pump), VOC emissions shall be calculated using the appropriate emission factor from AP-42, Section 3.3, the rated capacity of the fire pump (bhp), and hours of operation.
- (c) For the fryer:
 - (1) VOC emissions from the fryer oil shall be calculated using the most appropriate emission factor from AP-42 (currently Section 9.13.3, for snack chip deep fat frying) and monthly production records.
 - (2) VOC emissions from the fryer combustion shall be calculated using the appropriate emission factor from AP-42, Section 1.4, and monthly fuel records.
 - (3) For yeast-based product, VOC emissions from the product shall be calculated using the emission factor from AP-42, Section 9.9.6, and monthly production records; this includes inputting the appropriate values for the initial baker's percent of yeast, the total yeast action time, the final spike baker's percent of yeast, and the spiking time for each particular product line.
- (d) For the Line 7 Oven (Source ID 108) and the AMF Bun Line (Source ID 109):
 - (1) VOC emissions from the oven burners shall be calculated using the appropriate emission factor from AP-42, Section 1.4, and monthly fuel records.
 - (2) Uncontrolled VOC emissions from the product shall be calculated using the emission factor from AP-42, Section 9.9.6, and monthly production records; this includes inputting the appropriate values for the initial baker's percent of yeast, the total yeast action time, the final spike baker's percent of yeast, and the spiking time for each particular product line.
 - (3) Controlled emissions of VOC shall be calculated based on the uncontrolled VOC emissions and a destruction efficiency of 95%, which shall be validated through periodic sampling and stack testing.
- (e) For the catalytic oxidizers (Source IDs C108 and C109), VOC emissions from the catalytic oxidizer burners shall be calculated using the most appropriate emission factor from AP-42 (currently Section 1.4, for natural gas combustion sources) and monthly fuel records.
- (f) For Source ID 700 (60 kW emergency generator), VOC emissions shall be calculated using the appropriate emission factor from AP-42, Section 3.2, the rated capacity of the fire pump (MMBtu/hr), and hours of operation.
- (f) For processes that utilize natural gas (i.e. infrared space heaters), VOC emissions shall be calculated using the most appropriate emission factor from AP-42 (currently Section 1.4, for natural gas combustion sources) and monthly fuel records.
- (g) For sources that utilize inks and solvents, ink and solvent usage shall be monitored monthly so that VOC emissions can be calculated monthly and as a 12-month rolling sum using mass balancing, assuming that all VOC is emitted to the atmosphere.
 - (1) Calculations are to be supported with Department approved documentation that documents the VOC content in the inks and/or solvents.
 - (2) If the vendor of an ink or solvent publishes a range of pollutant content from the material, the permittee shall use the highest value of the range to calculate VOC emissions unless the Department determines, in writing, that there is

**SECTION C. Site Level Requirements**

site-specific data or a site-specific monitoring program to support another content value within the range.

(h) An alternate procedure for calculating emissions factors and emissions may be used upon written consent of the Department.

019 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.218(g)(8) and 127.218(n)]

(a) Records required per this operating permit shall be maintained onsite for a period of five (5) years and shall be made available to the Department upon request.

(b) The permittee shall retain a copy of the records necessary to determine compliance with the requirements of this operating permit and of the PAL, including a determination of the 12-month rolling total emissions for each VOC emission unit, for a minimum of 5 years.

(c) The permittee shall retain a copy of the following records for the duration of the PAL effective period and 5 years after the PAL permit expires:

(1) A copy of the PAL permit application and applications for revisions to the PAL permit.

(2) Each annual certification of compliance required under Title V of the Clean Air Act (42 U.S.C.A. §§ 7661—7661f) and regulations adopted under the act and the data relied on in certifying the compliance.

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

(a) Emissions increase of minor significance without notification to the Department.

(b) De minimis increases with notification to the Department, via letter.

(c) Increases resulting from a Request for Determination (RFD) to the Department.

(d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

(a) Date, time, and location of the incident(s);

(b) The cause of the event; and

(c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

V. REPORTING REQUIREMENTS.**# 022 [25 Pa. Code §127.218.]****PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.218(o)]

The following requirements apply to reporting and notification:

(a) The permittee shall submit semiannual monitoring reports and prompt deviation reports to the Department in accordance with the Title V operating permit requirements of 25 Pa. Code Chapter 127 Subchapters F and G.

(b) The semiannual reports must:

**SECTION C. Site Level Requirements**

- (1) Be submitted to the Department within 30 days of the end of each reporting period.
- (2) Contain the following information:
- (i) The identification of the owner and operator and the permit number.
 - (ii) Total annual emissions in TPY based on a 12-month rolling total for each month in the reporting period recorded in compliance with 25 Pa. Code Section 127.218(n)(1).
 - (iii) Data relied upon, including the quality assurance or quality control data, in calculating the monthly and annual PAL pollutant emission.
 - (iv) A list of the emissions units modified or added to the facility during the preceding 6-month period.
 - (v) The number, duration and cause of deviations or monitoring malfunctions, and the corrective action taken.
 - (vi) A notification of cessation of the monitoring system, whether the cessation was permanent or temporary, the reason for the cessation, the anticipated date that the monitoring system will continue, whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of the pollutant or the number determined by the method included in the permit under subsection 25 Pa. Code Section 127.218(m)(10).
 - (vii) A statement signed by a responsible official of the company that owns or operates the facility certifying the truth, accuracy and completeness of the information provided in the report.

(c) The reports of deviations and exceedances of the PAL requirements, including periods in which no monitoring is available, must:

- (1) Be submitted to the Department promptly. A report submitted under 25 Pa. Code Chapter 127 Subchapter G satisfies this reporting requirement.
- (2) Contain the following information:
- (i) The identification of the owner and operator and the permit number.
 - (ii) The PAL requirement that experienced the deviation or that was exceeded.
 - (iii) Emissions resulting from the deviation or the exceedance.
 - (iv) A statement signed by a responsible official of the company that owns or operates the facility certifying the truth, accuracy and completeness of the information provided in the report.

(d) The permittee shall submit to the Department the results of any revalidation test or method within 3 months after completion of the test or method.

023 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c)]

The deviation report required by Condition #025(b), of Section B, of this permit, is for monitoring deviations, only. This report shall be submitted to the Department at a frequency of at least every six (6) months.

024 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c)]

The permittee shall submit the following reports:

**SECTION C. Site Level Requirements**

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit. The annual certificate of compliance shall be submitted to DEP electronically, and EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov.

(b) A semi annual deviation report, due by October 1, of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

025 [25 Pa. Code §127.441]
Operating permit terms and conditions.

Within thirty (30) days after permit re-issuance, the permittee shall submit to the Department for approval any revised recordkeeping formats required per this operating permit.

026 [25 Pa. Code §127.441]
Operating permit terms and conditions.

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511]

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if

**SECTION C. Site Level Requirements**

the annual emissions inventory report is required by permit or authorization.

VI. WORK PRACTICE REQUIREMENTS.**# 027 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified under 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or suitable chemicals, as approved by the Department, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, water, or other suitable chemicals, as approved by the Department, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (c) Paving and maintenance of roadways.
- (d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

028 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

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

VII. ADDITIONAL REQUIREMENTS.**# 029 [25 Pa. Code §127.218.]****PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.218(k)]

The following requirements apply to a renewal of a PAL:

- (a) The Department will follow the procedures specified in 25 Pa. Code Section 127.218(e) in approving a request to renew a PAL permit for this facility, and will provide both the proposed PAL level and a written rationale for the proposed PAL level to the public for review and comment in accordance with the applicable public notice requirements in 25 Pa. Code Section 127.218(e). During the public review, a person may propose a PAL level for the facility for consideration by the Department.
- (b) The permittee shall submit a timely application to the Department to request renewal of a PAL permit. A timely application is one that is submitted at least 6 months prior to, but not earlier than 18 months prior to the date of permit expiration. If the permittee submits a complete application to renew the PAL permit within this time period, the PAL continues to be effective until the revised permit with the renewed PAL is issued.
- (c) The application to renew a PAL permit must contain the following information:
 - (1) The information required in 25 Pa. Code Section 127.218(b)(1)--(3).
 - (2) A proposed PAL level.
 - (3) The sum of the potentials to emit of the emissions units under the PAL.

**SECTION C. Site Level Requirements**

(4) Other information the permittee wishes the Department to consider in determining the appropriate level at which to renew the PAL.

(d) The Department will consider the options in subparagraphs (1) and (2) below in determining whether and how to adjust the PAL. In no case may the adjustment fail to comply with subparagraphs (3) and (4) below.

(1) If the emissions level calculated in accordance with 25 Pa. Code Section 127.218(f) is equal to or greater than 80% of the PAL level, the Department may renew the PAL at the same level without considering the factors set forth in subparagraph (2) below.

(2) The Department may set the PAL at a level that it determines to be more representative of the facility's baseline actual emissions or that it determines to be appropriate considering air quality needs, advances in control technology, anticipated economic growth in the area, desire to reward or encourage the facility's voluntary emissions reductions or other factors specifically identified by the Department in its written rationale.

(3) If the potential to emit of the major facility is less than the PAL, the Department will adjust the PAL to a level no greater than the potential to emit of the facility.

(4) The Department will not approve a renewed PAL level higher than the current PAL unless the facility has complied with 25 Pa. Code Section 127.218(l).

(e) If the compliance date for a State or Federal requirement that applies to the facility occurs during the PAL effective period and the Department has not already adjusted for this requirement, the PAL must be adjusted at the time of the PAL permit renewal or Title V permit renewal, whichever occurs first.

030 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.218(b), 127.218(g), and 127.218(p)]

(a) The effective date of the PAL period begins on July 7, 2023, and expires on July 7, 2033.

(b) If the permittee applies to renew a PAL in accordance with 25 Pa. Code Section 128.218(k) before the end of the PAL effective period, the PAL permit does not expire at the end of the PAL effective period. The PAL permit remains in effect until the Department issues a revised PAL permit.

(c) The permittee shall continue to comply with applicable Federal or State requirements, emissions limitations and work practice requirements that were established prior to the PAL effective date.

(d) The Department may modify or supersede any PAL which was established prior to the date of approval of the PAL provisions by the EPA as a revision to the SIP.

031 [25 Pa. Code §127.218.]**PALs.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.218(i)]

The following requirements apply to reopening of the PAL permit:

(a) During the PAL effective period, the Department will reopen the PAL permit to:

(1) Correct typographical/calculation errors made in setting the PAL or reflect a more accurate determination of emissions used to establish the PAL.

(2) Reduce the PAL if the permittee creates creditable emissions reductions for use as offsets under 25 Pa. Code Section 127.207 (relating to creditable emissions decrease or ERC generation or creation).

(3) Revise the PAL to reflect an increase in the PAL as provided under 25 Pa. Code Section 127.218(l).

**SECTION C. Site Level Requirements**

(b) The Department may reopen the PAL permit to reduce the PAL:

(1) To reflect newly applicable Federal requirements with compliance dates after the PAL effective date.

(2) Consistent with a requirement that is enforceable as a practical matter and that the Department may impose on the facility consistent with all applicable requirements.

(3) If the Department determines that a reduction is necessary to avoid causing or contributing to:

(i) A NAAQS or PSD increment violation.

(ii) An adverse impact on an air quality related value that has been identified for a Federal Class I area by a Federal Land Manager and for which information is available to the general public.

(c) Except for the permit reopening in paragraph (a)(1) of this section for the correction of typographical/calculation errors that do not increase the PAL level, other reopening shall be carried out in accordance with the public participation requirements of subsection 25 Pa. Code Section 127.218(e).

032 [25 Pa. Code §127.218.]**PALs.**

The following sources are covered under the PAL:

(a) Small emissions units -

(1) Clayton Boiler (Source ID 031)

(2) Misc. Combustion Sources (Source ID 032)

(3) Caterpillar Fire Pump (Source ID 036)

(4) Line 7 Oven (Source ID 108)

(5) AMF Bun Line (Source ID 109)

(6) 60 kW Emergency Generator (Source ID 700)

(7) CSM Catalytic Oxidizer (Source ID C108)

(8) CSM 34A Catalytic Oxidizer (Source ID C109)

(9) Miscellaneous, Section G [Three (3) Make-up Air Units; Twenty (20) Infrared Heaters; One (1) Parts Washer; and Line 7 Oven Markem printers]

(b) Major emissions unit - Line 1 Fryer (Source ID 101)

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

***** Permit Shield In Effect *****

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: CLAYTON BOILER

Source Capacity/Throughput: 6.300 MMBTU/HR

6,117.000 CF/HR

NATURAL GAS

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.11]

Combustion units

Emissions of filterable PM from this source shall not exceed 0.4 pounds per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion unitsA person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from a combustion unit in excess of 1.2 pounds per million Btu of heat input.**Fuel Restriction(s).**

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Clayton Boiler shall only use natural gas for combustion.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the fuel usage of the Clayton Boiler on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall record the fuel usage of the Clayton Boiler on a monthly basis.

(b) The permittee shall calculate and record the emissions of volatile organic compounds from the Clayton Boiler on a monthly basis and as a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

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

VII. ADDITIONAL REQUIREMENTS.

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

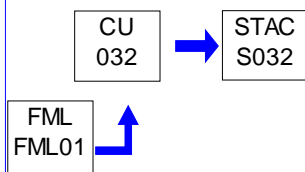
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 032

Source Name: MISC COMBUSTION SOURCES

Source Capacity/Throughput: 11,283.000 CF/HR NATURAL GAS

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.22]

Combustion units

A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from a combustion unit in excess of 1.2 pounds per million Btu of heat input.

Fuel Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The sources covered under Source ID 032 shall only burn natural gas for combustion.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the total fuel usage of the sources covered under Source ID 032 on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall record the total fuel usage of the sources covered under Source ID 032 on a monthly basis.

(b) The permittee shall calculate and record the total emissions of volatile organic compounds from the sources covered under Source ID 032 on a monthly basis and as a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Source ID 032 consists of the following sources:

(a) Two (2) Patterson-Kelly Boilers	1.50 MMBtu/Hr, each
(b) Burnham Boiler	1.941 MMBtu/Hr (AZO Bldg)
(c) PVI Industries Boiler	0.40 MMBtu/Hr
(d) Line 4 Pan Washer Dryer	0.74 MMBtu/Hr
(e) Waste Water Room Heater	0.05 MMBtu/Hr (Manuf. - Reznor)
(f) Three (3) Water Heaters	2 - 0.40 MMBtu/hr, each; 1 - 0.20 MMBtu/hr (above fermentation rm)
(g) Two (2) Glycol Heaters	1.8 MMBtu/Hr, each (on roof)
(h) NH3 Heater	0.1 MMBtu/Hr

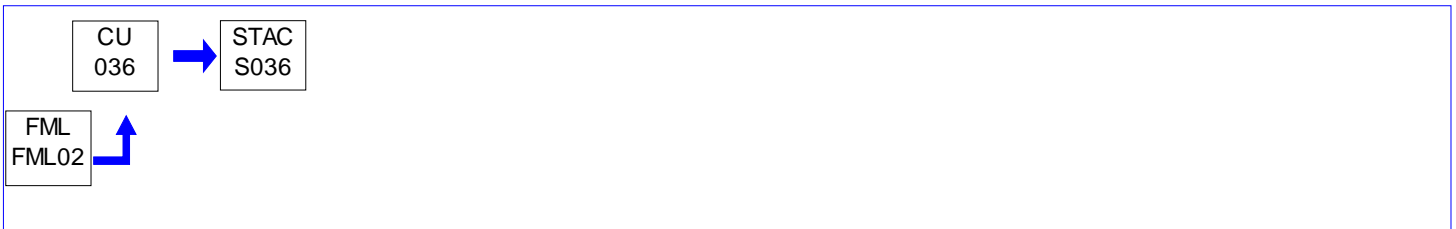
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 036

Source Name: CATERPILLAR FIRE PUMP

Source Capacity/Throughput: 1.380 MMBTU/HR
10.100 Gal/HR #2 OIL

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.21]****General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

Operation Hours Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority or permit condition is also derived from 25 PA Code §§ 127.512(h) and 129.93(c)(5)]

The permittee shall limit the Caterpillar Fire Pump to 500 hours of operation in any consecutive 12-month period.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What are my monitoring, installation, operation, and maintenance requirements?**

The permittee shall minimize the Caterpillar Fire Pump's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

The permittee shall operate the Caterpillar Fire Pump according to the following requirements:

(a) The permittee may operate the Caterpillar Fire Pump for a maximum of 100 hours per calendar year for the following: The Caterpillar Fire Pump may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the Caterpillar Fire Pump beyond 100 hours per calendar year.

(b) The Caterpillar Fire Pump may not be used in any manner other than for emergency operation, maintenance, and testing without prior approval from the Department.

II. TESTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****III. MONITORING REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority or permit condition is also derived from 40 CFR § 63.6625]

- (a) The Caterpillar Fire Pump shall be equipped with a functional, non-resettable hour meter to monitor the hours of operation.
- (b) The permittee shall monitor the operating hours of the Caterpillar Fire Pump (daily when operating).
- (c) The permittee shall monitor fuel usage on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall record fuel usage from the Caterpillar Fire Pump on a monthly basis.
- (b) The permittee shall calculate and record the emissions of volatile organic compounds from the Caterpillar Fire Pump on a monthly basis and as a 12-month rolling sum.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What records must I keep?**

[Additional authority for this permit condition is also derived from 40 CFR § 63.6640]

- (a) The permittee shall maintain the following records for the Caterpillar Fire Pump:
 - (1) A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart ZZZZ.
 - (2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or monitoring equipment.
 - (3) Records of all required maintenance performed on the Caterpillar Fire Pump and on the monitoring equipment, including oil analysis and results.
 - (4) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR § 63.6605(b), including corrective actions to restore malfunctioning process and monitoring equipment to its normal or usual manner of operation.
- (b) The permittee shall maintain records to demonstrate compliance with either of the following:
 - (1) Operating and maintaining the Caterpillar Fire Pump according to the manufacturer's emission-related operation and maintenance instructions;
 - (2) Operating and maintaining the Caterpillar Fire Pump according to a maintenance plan developed by the permittee such that it provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (c) The permittee shall record of the hours of operation of the Caterpillar Fire Pump each time it is operated. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for maintenance and testing.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

**SECTION D. Source Level Requirements****In what form and how long must I keep my records?**

[Additional authority for this permit condition is also derived from 40 CFR § 63.10(b)(1)]

- (a) Records required for the Caterpillar Fire Pump shall be in a form suitable and readily available for expeditious review.
- (b) The permittee shall maintain each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) The permittee shall keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What are my monitoring, installation, operation, and maintenance requirements?**

The permittee shall operate and maintain the Caterpillar Fire Pump according to the manufacturer's emission-related written instructions or develop a source specific maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

[Additional authority for this permit condition is also derived from 40 CFR § 63.6625]

- (a) The following requirements apply to the Caterpillar Fire Pump:
 - (1) The permittee shall change the oil and filter every 500 hours of operation or annually, whichever comes first;
 - (2) The permittee shall inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and,
 - (3) The permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- (b) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements in paragraph (a) above. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following, such that the oil meets all applicable conditions:
 - (1) Total Base Number, such that it is greater than or equal to 30% of the Total Base Number of the oil when new;
 - (2) Viscosity, such that it has not changed more than 20% from the viscosity of the oil when new; and,
 - (3) Percent water content (by volume), such that it is not greater than 0.5.
- (c) If the permittee complies with all applicable parameters in paragraph (b) above, the permittee is not required to change

**SECTION D. Source Level Requirements**

the oil. If any of the parameters are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the Caterpillar Fire Pump.

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Caterpillar Fire Pump is Model No. PL4927, with a rated capacity of 196 brake horsepower.

***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: LINE 1 FRYER

Source Capacity/Throughput:

1.720 MMBTU/HR

1,670.000 CF/HR

NATURAL GAS

1.000 Tons/HR

YEAST AND NON-YEAST PRODU

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Emissions of particulate matter (PM) from the fryer shall not exceed 0.02 grains per dry standard cubic feet.

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source shall only utilize natural gas for combustion.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §139.1]

Sampling facilities.

If the Department ever has cause to believe that the fryer is not complying with the PM emission rate of 0.02 gr/dscf, the permittee shall be required to perform stack testing to demonstrate compliance.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source:

- The amount of natural gas that is consumed by this source on at least a monthly basis.
- The type of product and amount by weight of each product manufactured by this source on a daily basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The owner or operator shall keep records of the following for this source:

- The amount of natural gas that is consumed by this source on at least a monthly basis.
- The type of product and amount by weight of each product manufactured by this source on a daily basis.

**SECTION D. Source Level Requirements**

(b) When processing yeast-leavened products, the owner or operator shall keep records of the following information for each product type for determining ethanol (VOC) emissions as they apply to this source:

- (1) The initial baker's percent of yeast.
- (2) The total yeast action time in hours.
- (3) The final (spike) baker's percent of yeast.
- (4) The spiking time in hours.

(c) The owner or operator shall calculate and record the emissions of VOC from this source on a monthly and 12-month rolling basis.

007 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain a log identifying the cleaning dates for the mist eliminator filters. The condition of the filters shall be noted.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) Emissions from the fryer shall be exhausted through an exhaust hood equipped with the appropriate mist eliminator filters.
- (b) The mist eliminator filters shall be cleaned every two weeks and inspected for wear.
- (c) The filters shall be replaced, as necessary.

VII. ADDITIONAL REQUIREMENTS.**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Production Line No. 1 consists of a mixing area, shaping and cutting station, proofer, fryer, icing station, and packaging station. The fryer for Production Line No. 1 is manufactured by Belshaw (Model HD2000), with a rated heat input of 1.72 MMBtu/hr and equipped with a Model KG 2025 mist eliminator, manufactured by Air Con.

***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: LINE 7 OVEN

Source Capacity/Throughput:

9.000 Tons/HR

LOAF BREAD

10,485.000 CF/HR

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.13]

Processes

Emissions of filterable PM from the Line 7 Oven, after controls, shall not exceed 0.04 grains per dry standard cubic feet.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Line 7 Oven (Source ID 108), controlled by the CSM Catalytic Oxidizer (Source ID C108), shall comply with the following emission limits:

- | | |
|--|--|
| (a) Nitrogen Oxides (NO _x) - | 1.14 lb/hr and 4.98 tons per 12-month rolling period |
| (b) Carbon Monoxide (CO) - | 0.95 lb/hr and 4.18 tons per 12-month rolling period |
| (c) Volatile Organic Compounds (VOC) - | 2.31 lbs/hr and 10.10 tons per 12-month rolling period |

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source shall only utilize natural gas for combustion.

(b) Total natural gas consumption from Line 7 Oven and the CSM Catalytic Oxidizer shall not exceed 99,503,000 cubic feet per 12-month rolling period.

Throughput Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source shall not exceed a production rate of 70,956 tons per 12-month rolling period.

Control Device Efficiency Restriction(s).

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

100% of the VOC emissions from this source shall be captured and controlled by the CMS Catalytic Oxidizer (Source ID C108).

II. TESTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****III. MONITORING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The following information shall be monitored for each product baked in the Line 7 Oven:

- (1) The initial baker's percent of yeast.
- (2) The total yeast action time.
- (3) The final spike baker's percent of yeast.
- (4) The spiking time.

(b) The permittee shall monitor all changes to product specifications.

007 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall monitor all necessary process data for the oven product, including hours of operation, such that ethanol emissions can be determined on a monthly basis and as an hourly average.

(b) The permittee shall monitor the production throughput on a monthly basis to demonstrate compliance with the 12-month total limit on production.

(c) The Line 7 Oven and the CSM Catalytic Oxidizer shall be equipped with a fuel gauge to determine total fuel consumption. Fuel usage and hours of operation shall be monitored such that emissions from the oven burners and the catalytic oxidizer burner can be determined on a monthly basis and as an hourly average.

(d) The bypass stack damper shall be equipped with a pressure drop gauge to determine the pressure drop when the oven is directing emissions to the catalytic oxidizer.

(e) Emissions to be monitored include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).

IV. RECORDKEEPING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The following information shall be recorded for each product baked in the Line 7 Oven:

- (1) The initial baker's percent of yeast.
- (2) The total yeast action time.
- (3) The final spike baker's percent of yeast.
- (4) The spiking time.

(b) The permittee shall maintain records of all current product specifications as well as records of past product specifications, including when those specifications were in place. These specification records shall be maintained for a minimum of 5 years.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall record all necessary process data for the oven product, including hours of operation, such that ethanol emissions can be recorded on a monthly basis, as an hourly average, and as a 12-month rolling sum.

(b) The permittee shall record the production throughput on a monthly basis and as a 12-month rolling sum to demonstrate compliance with the 12-month total limit on production.

(c) The permittee shall record the total fuel usage from Line 7 Oven and the CSM Catalytic Oxidizer and the hours of operation on a monthly basis, such that emissions from the oven burners and the catalytic oxidizer burner can be recorded on a monthly basis, as an hourly average, and as a 12-month rolling sum.

**SECTION D. Source Level Requirements**

(d) The permittee shall record once per day the pressure drop across the bypass stack damper, while product is in the oven and emissions are being vented to the catalytic oxidizer.

(e) Emissions to be recorded include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).

(f) Emissions from the product (ethanol), the oven burners, and the catalytic oxidizer burner shall be totaled on a monthly basis and as a 12-month rolling sum. An hourly average shall be determined monthly for each criteria pollutant.

V. REPORTING REQUIREMENTS.**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Any changes in the product formulation that may result in a potential-to-emit greater than what is approved in Plan Approval application No. 15-0104D and herein this operating permit shall be reported to the Department for prior written approval.

VI. WORK PRACTICE REQUIREMENTS.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) Pursuant to the Best Available Technology requirements of 25 Pa. Code Sections 127.1 and 127.12, emissions from the Line 7 Oven shall be controlled by a catalytic oxidizer with a destruction of 95% for VOC, or such that emissions of VOC from the outlet are 7 ppm_{dv} or less, reported as propane.

(b) The Line 7 Oven may bypass the catalytic oxidizer during periods of startup, shutdown, and downtime when there is no product in the oven or entering the oven.

(c) The bypass mechanism must be electronically controlled such that the permittee cannot manually bypass the catalytic oxidizer when there is product in the oven.

(d) The bypass stack damper shall have a minimum negative pressure drop of -0.5 inches water gauge when product is in the oven and emissions are being directed to the catalytic oxidizer. As an example, -0.4 is less negative pressure, and is non-compliant. -0.6 is more negative, meeting this requirement.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain and operate the Line 7 Oven and the associated catalytic oxidizer in accordance with the manufacturers' specifications and good engineering practice.

VII. ADDITIONAL REQUIREMENTS.**# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Line 7 Oven shall be manufactured by AMF BakeTech, Model type MaxiSaver Twin Oval with 10 ft radius curve, or equivalent, with the following maximum rates:

(a) 18,000 lbs of product baked per hour (9.0 tons/hr)

(b) 10.8 MMBtu per hour

*** **Permit Shield in Effect.** ***

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: AMF BUN LINE

Source Capacity/Throughput:

7,136.000 CF/HR

Natural Gas

5.200 Tons/HR

BREAD BUNS

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.13]

Processes

Emissions of filterable PM from the AMF Bun Line, after controls, shall not exceed 0.04 grains per dry standard cubic feet.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The AMF Bun Line (Source ID 109), controlled by the CSM 34A Catalytic Oxidizer (Source ID C109), shall comply with the following emission limits:

- | | |
|--|--|
| (a) Nitrogen Oxides (NOx) - | 0.811 lb/hr and 3.55 tons per 12-month rolling period |
| (b) Carbon Monoxide (CO) - | 0.681 lb/hr and 2.98 tons per 12-month rolling period |
| (c) Volatile Organic Compounds (VOC) - | 0.803 lbs/hr and 3.52 tons per 12-month rolling period |

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source shall only utilize natural gas for combustion.

(b) Total natural gas consumption from the AMF Bun Line and the CSM 34A Catalytic Oxidizer shall not exceed 71,016,000 cubic feet per 12-month rolling period.

Throughput Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source shall not exceed a production rate of 45,864 tons per 12-month rolling period.

Control Device Efficiency Restriction(s).

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

100% of the VOC emissions from this source shall be captured and controlled with a minimum control efficiency of 95%.

II. TESTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****III. MONITORING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall monitor all necessary process data for the oven product, including hours of operation, such that ethanol emissions can be determined on a monthly basis and as an hourly average.
- (b) The permittee shall monitor the production throughput on a monthly basis to demonstrate compliance with the 12-month total limit on production.
- (c) The AMF Bun Line and the CSM 34A Catalytic Oxidizer shall be equipped with a fuel gauge to determine total fuel consumption. Fuel usage and hours of operation shall be monitored such that emissions from the oven burners and the catalytic oxidizer burner can be determined on a monthly basis and as an hourly average.
- (d) The bypass stack damper shall be equipped with a pressure drop gauge to determine the pressure drop when the oven is directing emissions to the catalytic oxidizer.
- (e) Emissions to be monitored include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).

007 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The following information shall be monitored for each product baked on the AMF Bun Line:
- (1) The initial baker's percent of yeast.
 - (2) The total yeast action time.
 - (3) The final spike baker's percent of yeast.
 - (4) The spiking time.
- (b) The permittee shall monitor all changes to product specifications.

IV. RECORDKEEPING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall record all necessary process data for the oven product, including hours of operation, such that ethanol emissions can be recorded on a monthly basis, as an hourly average, and as a 12-month rolling sum.
- (b) The permittee shall record the production throughput on a monthly basis and as a 12-month rolling sum to demonstrate compliance with the 12-month total limit on production.
- (c) The permittee shall record the total fuel usage from the AMF Bun Line and the CSM 34A Catalytic Oxidizer and the hours of operation on a monthly basis, such that emissions from the oven burners and the catalytic oxidizer burner can be recorded on a monthly basis, as an hourly average, and as a 12-month rolling sum.
- (d) The permittee shall record once per day the pressure drop across the bypass stack damper, while product is in the oven and emissions are being vented to the catalytic oxidizer.
- (e) Emissions to be recorded include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).
- (f) Emissions from the product (ethanol), the oven burners, and the catalytic oxidizer burner shall be totaled on a monthly basis and as a 12-month rolling sum. An hourly average shall be determined monthly for each criteria pollutant.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The following information shall be recorded for each product baked on the AMF Bun Line:

**SECTION D. Source Level Requirements**

- (1) The initial baker's percent of yeast.
- (2) The total yeast action time.
- (3) The final spike baker's percent of yeast.
- (4) The spiking time.

(b) The permittee shall maintain records of all current product specifications as well as records of past product specifications, including when those specifications were in place. These specification records shall be maintained for the life of the AMF Bun Line.

V. REPORTING REQUIREMENTS.**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Any changes in the product formulation that may result in a potential-to-emit greater than what is approved herein this Plan Approval shall be reported to the Department for prior written approval.

VI. WORK PRACTICE REQUIREMENTS.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) Pursuant to the Best Available Technology requirements of 25 Pa. Code Sections 127.1 and 127.12, emissions from the AMF Bun Line shall be controlled by a catalytic oxidizer with a destruction of 95% for VOC.

(b) The AMF Bun Line may bypass the catalytic oxidizer during periods of startup, shutdown, and downtime when there is no product in the oven or entering the oven.

(c) The bypass mechanism must be electronically controlled such that the permittee cannot manually bypass the catalytic oxidizer when there is product in the oven.

(d) The bypass stack damper shall have a minimum negative pressure drop of -0.5 inches water gauge when product is in the oven and emissions are being directed to the catalytic oxidizer. As an example, -0.4 is less negative pressure, and is non-compliant. -0.6 is more negative, meeting this requirement.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain and operate the AMF Bun Line and the associated catalytic oxidizer in accordance with the manufacturers' specifications and good engineering practice.

VII. ADDITIONAL REQUIREMENTS.**# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The AMF Bun Line shall be manufactured by AMF BakeTech, Model type MaxiSaver 737, or equivalent, with the following maximum rates:

- (a) 10,500 lbs of product baked per hour (5.25 tons/hr)
- (b) 7.35 MMBtu per hour

***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

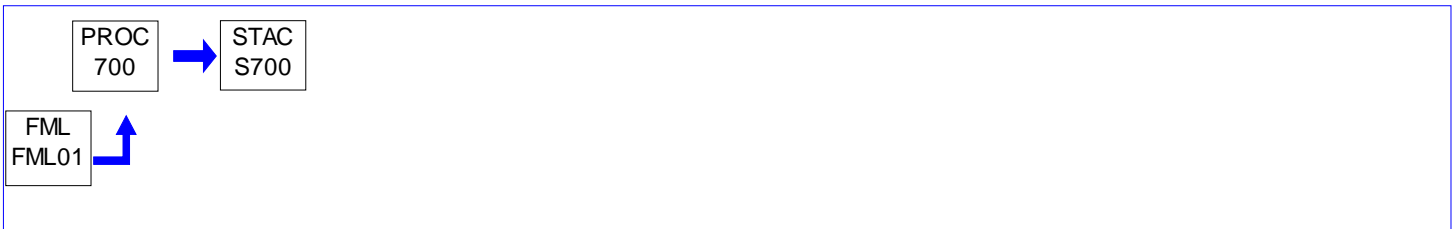
Source ID: 700

Source Name: 60 KW EMERGENCY GENERATOR

Source Capacity/Throughput: 0.814 MMBTU/HR

790.000 CF/HR

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

The permittee may not permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

002 [25 Pa. Code §123.21]**General**

The permittee may not permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4233]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 40 CFR § 60.4243(b)]

(a) The permittee shall comply with the following emission limits, applicable to this source:

- | | |
|--|-------------|
| (1) Non-methane Hydrocarbons (NMHC) + Nitrogen Oxides (NO _x) - | 10 g/HP-hr |
| (2) Carbon Monoxide (CO) - | 387 g/HP-hr |

(b) The permittee must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) and (2) of this condition:

- (1) Purchasing an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods:
- (i) If you operate and maintain a certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR Part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.
 - (ii) If you do not operate and maintain a certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance as follows: you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test within 1 year of engine startup to demonstrate compliance.

**SECTION D. Source Level Requirements**

(2) Purchasing a non-certified engine and demonstrating compliance according to the requirements specified in 40 CFR § 60.4244 (pertaining to specific test methodology) as applicable, and according to the following: you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance.

Operation Hours Restriction(s).

**# 004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

The permittee shall operate Source ID 700 according to the requirements in paragraphs (a) through (d) of this condition. In order for the engine to be considered an emergency stationary internal combustion engine (ICE), any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) through (d) of this condition, is prohibited.

(a) There is no time limit on the use of Source ID 700 in emergency situations for purposes of 40 CFR Part 60, Subpart JJJJ compliance.

(b) Source ID 700 may be operated for any combination of the purposes specified in paragraphs (b)(1) through (b)(3) of this condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (c) and (d) of this condition counts as part of the 100 hours per calendar year allowed by this paragraph (b).

(1) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(2) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(3) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (b) of this condition. Except as provided in paragraph (d) of this condition, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(d) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

(2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

**SECTION D. Source Level Requirements**

(3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(4) The power is provided only to the facility itself or to support the local transmission and distribution system.

(5) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

(e) The permittee may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR § 60.4233. If performance testing is performed, testing shall be performed in accordance with the requirements of 40 CFR § 60.4244.

II. TESTING REQUIREMENTS.

**# 005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 40 CFR § 60.4244]

(a) If the permittee does not operate and maintain Source ID 700 according to the manufacturer's emission-related written instructions, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission limits contained herein this operating permit within 1 year of startup.

(b) If performance testing is conducted on Source ID 700, performance testing shall be conducted in accordance with 40 CFR § 60.4244.

(c) If performance testing is conducted on Source ID 700, the permittee must submit a copy of each performance test as conducted in accordance with 40 CFR § 60.4244 within 60 days after the test has been completed.

III. MONITORING REQUIREMENTS.

**# 006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4237]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?**

Source ID 700 shall be equipped with a functional, non-resettable hour meter.

IV. RECORDKEEPING REQUIREMENTS.

**# 007 [25 Pa. Code §127.441]
Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.218]

VOC emissions shall to be calculated and recorded monthly and as a 12-month rolling sum.

**# 008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

If the permittee does not operate and maintain Source ID 700 according to the manufacturer's emission-related written instructions, the permittee must keep a maintenance plan and records of conducted maintenance to demonstrate compliance.

**SECTION D. Source Level Requirements**

**# 009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?**

The permittee shall keep records of the following:

- (a) Maintenance conducted on the engine.
- (b) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.
- (c) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR § 60.4243(a)(2), documentation that the engine meets the emission standards.

**# 010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?**

- (a) The permittee shall keep records of the hours of operation for this source, including:
 - (1) How many hours are spent for emergency operation, including what classified the operation as an emergency and emergency; and,
 - (2) How many hours are spent for non-emergency operation.
- (b) The permittee shall maintain records of proper maintenance and if the source is operated in a non-certified manner the permittee must have a maintenance plan.
- (c) Records required for this source shall be maintained for a minimum of five (5) years.

V. REPORTING REQUIREMENTS.

**# 011 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?**

If Source ID 700 operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR § 60.4243(d)(2)(ii) and (iii) or that operates for the purposes specified in 40 CFR § 60.4243(d)(3)(i), you must submit an annual report according to the requirements in paragraphs (a) through (c) of this condition:

- (a) The report must contain the following information:
 - (1) Company name and address where the engine is located.
 - (2) Date of the report and beginning and ending dates of the reporting period.
 - (3) Engine site rating and model year.
 - (4) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - (5) Hours operated for the purposes specified in 40 CFR § 60.4243(d)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR § 60.4243(d)(2)(ii) and (iii).

**SECTION D. Source Level Requirements**

(6) Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR § 60.4243(d)(2)(ii) and (iii).

(7) Hours spent for operation for the purposes specified in 40 CFR § 60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR § 60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(b) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(c) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to 40 CFR Part 60, Subpart JJJJ, is not available in CEDRI at the time that the report is due, the written report must be submitted to the EPA at the appropriate address listed in 40 CFR § 60.4.

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 700 is a 60 kW emergency generator manufactured by Taylor Power Systems (Model TG60), powered by a 105 hp engine manufactured by General Motors (Model Vortec 5.7 L).

***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

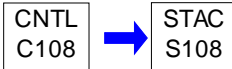
Source ID: C108

Source Name: CSM CATALYTIC OXIDIZER

Source Capacity/Throughput:

970.870 CF/HR

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.13]

Processes

Emissions of filterable PM from the catalytic oxidizer shall not exceed 0.04 grains per dry standard cubic feet.

Fuel Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The catalytic oxidizer shall only use natural gas as fuel.

(b) Total natural gas consumption by Line 7 Oven (Source ID 108) and the catalytic oxidizer shall not exceed 99,503,000 cubic feet per 12-month rolling period.

Control Device Efficiency Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall ensure that this catalytic oxidizer achieves 100% capture of the exhaust gas flow from the Line 7 Oven (Source ID 108).

(b) The catalytic oxidizer shall comply with one of the following at any time:

(1) The catalytic oxidizer shall have a minimum destruction efficiency of 95% for VOC; or,

(2) The outlet concentration of VOC emission shall be less than 7 ppmv, corrected to 15% O₂ and reported as propane.**II. TESTING REQUIREMENTS.**

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall perform a stack test on the Line 7 Oven (Source ID 108) and the CSM Catalytic Oxidizer (Source ID C108) using Department-approved procedures once every five (5) calendar years, where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual. The permittee shall:

(1) Perform an EPA Method 204 evaluation, to demonstrate that 100% of VOC emissions from the Line 7 Oven are being captured and controlled by the catalytic oxidizer; an EPA approved alternate method may be considered if the permittee can demonstrate by the alternate method that there is 100 percent capture efficiency of VOC emissions and that all the VOC emissions from the Line 7 Oven are controlled by the catalytic oxidizer.

(2) Perform VOC, NO_x, and CO stack testing on the catalytic oxidizer while it controls emissions from the Line 7 Oven and the Line 7 Oven operates at normal operating conditions.

**SECTION D. Source Level Requirements**

- (b) The capture efficiency evaluation shall be performed either prior to or concurrently with the VOC/NOx/CO stack testing.
- (c) The VOC stack testing shall be performed to determine the mass destruction efficiency and also to determine the outlet concentration in ppm_v, reported as propane. The O₂ and CO₂ concentrations shall be monitored and recorded and reported along with the VOC concentrations. VOC emissions shall also be reported in lbs/hr to demonstrate compliance with the hourly emission limit.
- (d) The NO_x and CO stack testing shall be performed to demonstrate compliance with the hourly emission limits for Line 7 Oven (Source ID 108).
- (e) During VOC stack testing, the following additional information shall be monitored:
- (1) The temperature immediately prior to and after the catalyst bed shall be monitored and recorded on a continuous basis.
 - (2) The pressure drop across the catalyst bed shall be monitored and recorded every 15 minutes during stack testing (a minimum of 5 readings for each stack test run).
- (f) All stack testing shall be performed in accordance with the provisions of Chapter 139 and with all applicable EPA reference method test procedures.
- (g) At least ninety (90) 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.
- (h) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.
- (i) Within sixty (60) days after the source test(s), copies of the complete test report, which includes all operating conditions and meets the requirements under Section C (Testing Requirements) of this operating permit, shall be submitted to DEP for approval.
- (j) The permittee shall submit an electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (mail and email addresses are provided under Section C of this operating permit, under Testing Requirements).
- (k) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) On an annual basis, the catalyst in the catalytic oxidizer shall be sampled and tested, using a method(s) approved by the Department, to assure that the catalyst has not been poisoned or become deteriorated and that the catalyst still has a minimum destruction efficiency of 95%.
- (b) Sampling and testing shall be performed within one year of the previous sampling and testing procedure, unless a Department approved VOC stack test was performed that showed the catalytic oxidizer is meeting the 95% destruction efficiency requirement for VOC. Whenever the aforementioned VOC stack testing is performed, catalyst sampling and testing shall resume, within 1 year of the stack test that was last performed.

III. MONITORING REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The catalytic oxidizer shall be equipped with a thermocouple to measure the temperature immediately before and after

**SECTION D. Source Level Requirements**

the catalyst bed. These temperatures are to be monitored on a continuous basis.

(b) The catalytic oxidizer shall be equipped with a pressure drop gauge to monitor the pressure drop across the catalyst bed. The pressure drop gauge shall be operable at all times that the catalytic oxidizer is in operation.

(c) The Line 7 Oven and the catalytic oxidizer shall be equipped with a fuel gauge to determine total fuel consumption. Fuel usage and hours of operation shall be monitored such that emissions from the oven burners and the catalytic oxidizer burner can be determined on a monthly basis and as an hourly average.

(d) Emissions to be monitored include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).

IV. RECORDKEEPING REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall maintain on site at all times records of the EPA method that was used to show that 100% of the VOC emissions from the Line 7 Oven are captured and controlled by the catalytic oxidizer.

(b) The permittee shall maintain on site the quarterly records of PM filter cleanings for the catalytic oxidizer.

(c) The permittee shall maintain records of annual catalyst sampling and analysis of the samples, including dates of sampling and testing and the results.

008 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall continuously record the temperature immediately before and after the catalyst bed. These temperatures are to be monitored on a continuous basis.

(b) The permittee shall record the pressure drop across the catalyst bed at a minimum of once per day when the catalytic oxidizer is operating.

(c) The permittee shall record the total fuel usage from Line 7 Oven and the CSM Catalytic Oxidizer and the hours of operation on a monthly basis, such that emissions from the oven burners and the catalytic oxidizer burner can be recorded on a monthly basis, as an hourly average, and as a 12-month rolling sum.

(d) Emissions to be recorded include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).

(e) Emissions from the product (ethanol), the oven burners, and the catalytic oxidizer burner shall be totaled on a monthly basis and as a 12-month rolling sum. An hourly average shall be determined monthly for each criteria pollutant.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The inlet temperature to the catalyst bed shall be maintained at or above 650 °F.

(b) The pressure drop across the catalyst shall be maintained within a range of 4.0 - 9.0 inches water gauge.

(c) DEP reserves the right to re-evaluate the pressure drop range should the source and control device fail to comply with

**SECTION D. Source Level Requirements**

the applicable emission requirements contained herein this operating permit.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain and operate the Line 7 Oven and CSM Catalytic Oxidizer in accordance with the manufacturers' specifications and good engineering practice.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a quarterly basis (every 3 months), the permittee shall clean the PM filters for the catalytic oxidizer.

VII. ADDITIONAL REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The catalytic oxidizer shall be manufactured by CSM Worldwide, Model No. 38A, or equivalent, with the following burner specifications:

Manufacturer:	Maxon
Model:	OvenPak-II, EB-1
Maximum Capacity:	1.0 MMBtu/hr

***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

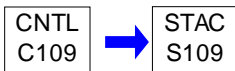
Source ID: C109

Source Name: CSM 34A CATALYTIC OXIDIZER

Source Capacity/Throughput:

970.870 CF/HR

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

Emissions of filterable PM from the catalytic oxidizer shall not exceed 0.04 grains per dry standard cubic feet.

Fuel Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The catalytic oxidizer shall only use natural gas as fuel.

(b) Total natural gas consumption by the AMF Bun Line (Source ID 109) and the catalytic oxidizer shall not exceed 71,016,000 cubic feet per 12-month rolling period.

Control Device Efficiency Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall ensure that this catalytic oxidizer achieves 100% capture of the exhaust gas flow from the AMF Bun Line (Source ID 109).

(b) The catalytic oxidizer shall have a minimum destruction efficiency of 95% for VOC.

II. TESTING REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) On an annual basis, the catalyst in the catalytic oxidizer shall be sampled and tested, using a method(s) approved by the Department, to assure that the catalyst has not been poisoned or become deteriorated and that the catalyst still has a minimum destruction efficiency of 95%.

(b) Sampling and testing shall be performed within one year of the previous sampling and testing procedure, unless a Department approved VOC stack test was performed that showed the catalytic oxidizer is meeting the 95% destruction efficiency requirement for VOC. Whenever the aforementioned VOC stack testing is performed, catalyst sampling and testing shall resume, within 1 year of the stack test that was last performed.

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall perform a stack test on the AMF Bun Line (Source ID 109) and the CSM 34A Catalytic Oxidizer (Source ID C109) using Department-approved procedures once every five (5) calendar years, where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual. The permittee shall:

(1) Perform an EPA Method 204 evaluation, to demonstrate that 100% of VOC emissions from the AMF Bun Line

**SECTION D. Source Level Requirements**

are being captured and controlled by the catalytic oxidizer; an EPA approved alternate method may be considered if the permittee can demonstrate by the alternate method that there is 100 percent capture efficiency of VOC emissions and that all the VOC emissions from the AMF Bun Line are controlled by the catalytic oxidizer.

(2) Perform VOC, NO_x, and CO stack testing on the catalytic oxidizer while it controls emissions from the AMF Bun Line and the AMF Bun Line operates at normal operating conditions.

(b) The capture efficiency evaluation shall be performed either prior to or concurrently with the VOC/NO_x/CO stack testing.

(c) The VOC stack testing shall be performed to determine the mass destruction efficiency and also to determine the outlet concentration in ppm_{vd}, reported as propane. The O₂ and CO₂ concentrations shall be monitored and recorded and reported along with the VOC concentrations. VOC emissions shall also be reported in lbs/hr to demonstrate compliance with the hourly emission limit.

(d) The NO_x and CO stack testing shall be performed to demonstrate compliance with the hourly emission limits for AMF Bun Line (Source ID 109).

(e) During VOC stack testing, the following additional information shall be monitored:

(1) The temperature immediately prior to and after the catalyst bed shall be monitored and recorded on a continuous basis.

(2) The pressure drop across the catalyst bed shall be monitored and recorded every 15 minutes during stack testing (a minimum of 5 readings for each stack test run).

(f) All stack testing shall be performed in accordance with the provisions of Chapter 139 and with all applicable EPA reference method test procedures.

(g) At least ninety (90) 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.

(h) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(i) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(j) The permittee shall submit an electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (mail and email addresses are provided under Section C of this operating permit, under Testing Requirements).

(k) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The catalytic oxidizer shall be equipped with a thermocouple to measure the temperature immediately before and after the catalyst bed. These temperatures are to be monitored on a continuous basis.

(b) The catalytic oxidizer shall be equipped with a pressure drop gauge to monitor the pressure drop across the catalyst bed. The pressure drop gauge shall be operable at all times that the catalytic oxidizer is in operation.

**SECTION D. Source Level Requirements**

(c) The AMF Bun Line and the catalytic oxidizer shall be equipped with a fuel gauge to determine total fuel consumption. Fuel usage and hours of operation shall be monitored such that emissions from the oven burners and the catalytic oxidizer burner can be determined on a monthly basis and as an hourly average.

(d) Emissions to be monitored include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).

IV. RECORDKEEPING REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall maintain on site at all times records of the EPA method that was used to show that 100% of the VOC emissions from the AMF Bun Line are captured and controlled by the catalytic oxidizer.

(b) The permittee shall maintain on site the quarterly records of PM filter cleanings for the catalytic oxidizer.

(c) The permittee shall maintain records of annual catalyst sampling and analysis of the samples, including dates of sampling and testing and the results.

008 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall continuously record the temperature immediately before and after the catalyst bed. These temperatures are to be monitored on a continuous basis.

(b) The permittee shall record the pressure drop across the catalyst bed at a minimum of once per day when the catalytic oxidizer is operating.

(c) The permittee shall record the total fuel usage from the AMF Bun Line and the CSM 34A Catalytic Oxidizer and the hours of operation on a monthly basis, such that emissions from the oven burners and the catalytic oxidizer burner can be recorded on a monthly basis, as an hourly average, and as a 12-month rolling sum.

(d) Emissions to be recorded include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM, PM-10, and PM-2.5), sulfur oxides (SO_x), and hazardous air pollutants (HAP).

(e) Emissions from the product (ethanol), the oven burners, and the catalytic oxidizer burner shall be totaled on a monthly basis and as a 12-month rolling sum. An hourly average shall be determined monthly for each criteria pollutant.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The inlet temperature to the catalyst bed shall be maintained at or above 630 °F.

(b) The pressure drop across the catalyst shall be maintained between 1 - 4.0 inches water gauge.

(c) DEP reserves the right to re-evaluate the pressure drop range should the source and control device fail to comply with the applicable emission requirements contained herein this operating permit.

010 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain and operate the AMF Bun Line and CSM 34A Catalytic Oxidizer in accordance with the

**SECTION D. Source Level Requirements**

manufacturers' specifications and good engineering practice.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a quarterly basis (every 3 months), the permittee shall clean the PM filters for the catalytic oxidizer.

VII. ADDITIONAL REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The catalytic oxidizer shall be manufactured by CSM Worldwide, Model No. 34A, or equivalent, with the following burner specifications:

Manufacturer:	Maxon
Model:	OvenPak-II, EB-1
Maximum Capacity:	1.0 MMBtu/hr

***** Permit Shield in Effect. *****

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 1

Group Description: Misc. Nat. gas fired Boilers <10 MMBtu/hr each

Sources included in this group

ID	Name
----	------

No Sources exist for this Group.

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §123.11]

Combustion units

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this source in excess of the rate of 0.4 pounds per million Btu of heat input.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the fuel usage for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the fuel usage for this source.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

***** Permit Shield in Effect. *****

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 2

Group Description: Misc. Nat. gas fired heaters

Sources included in this group

ID	Name
----	------

No Sources exist for this Group.

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §123.11]

Combustion units

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the rate of 0.4 pounds per million Btu of heat input.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the fuel used by this source(s).

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the fuel used by this source.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

***** Permit Shield in Effect. *****

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
031	CLAYTON BOILER		
Emission Limit			
1.200	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	Applies to filterable PM only	TSP
032	MISC COMBUSTION SOURCES		
Emission Limit			
1.200	Lbs/MMBTU		SOX
036	CATERPILLAR FIRE PUMP		
Emission Limit			
500.000	PPMV	Determined on a dry basis	SOX
101	LINE 1 FRYER		
Emission Limit			
500.000	PPMV	Determined on a dry basis	SOX
0.020	gr/DRY FT3	Applies to filterable PM only	TSP
108	LINE 7 OVEN		
Emission Limit			
0.950	Lbs/Hr		CO
4.180	Tons/Yr	Determined on a 12-month rolling basis	CO
1.140	Lbs/Hr		NOX
4.980	Tons/Yr	Determined on a 12-month rolling basis	NOX
0.040	gr/DRY FT3	Applies to filterable PM only	TSP
2.310	Lbs/Hr		VOC
10.100	Tons/Yr	Determined on a 12-month rolling basis	VOC
109	AMF BUN LINE		
Emission Limit			
0.040	gr/DRY FT3	Applies to filterable PM only	TSP
700	60 KW EMERGENCY GENERATOR		
Emission Limit			
387.000	GRAMS/HP-Hr		CO
10.000	GRAMS/HP-Hr	Combined with non-methane hydrocarbon emissions	NOX
10.000	GRAMS/HP-Hr	Combined with nitrogen oxide emissions	VOC
C108	CSM CATALYTIC OXIDIZER		
Emission Limit			
0.040	gr/DRY FT3	Applies to filterable PM only	TSP

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
C109	CSM 34A CATALYTIC OXIDIZER		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	Applies to filterable PM only	TSP

Site Emission Restriction Summary

Emission Limit	Pollutant	
41.700 Tons/Yr	Plantwide Applicable Limit; Determined on a 12-month rolling basis	VOC

**SECTION H. Miscellaneous.**

- (a) The following Plan Approvals and Operating Permit serve as the basis for certain terms and conditions set forth in this Title V Operating Permit:
- (1) Plan Approval No. 15-0104C
 - (2) Operating Permit No. OP-15-0104
- (b) The following sources have been deemed as insignificant sources:
- (1) Three (3) Make-up Air Units (1.88 MMBtu/Hr, each), located inside docking area.
 - (2) Nineteen (19) Infrared Heaters (0.08 MMBtu/Hr, each); One (1) Infrared Heater (0.10 MMBtu/Hr).
 - (3) Parts Washer (aqueous solution only).
 - (4) Line 7 Oven Markem Printers.
 - (5) Five (5) Air Make-up Units (1.2 MMBtu/Hr, each).
- (c) Under APS No. 328372, AUTH No. 979632, this Title V Operating Permit has been renewed for another 5-year term. This Title V Operating Permit incorporates Plan Approval No. 15-0104D, which includes a VOC Plantwide Applicable Limit (PAL).
- (d) Under APS No. 328372, AUTH No. 1212893, this Title V Operating Permit has been amended, to change the Responsible Official from Mr. Dan Scott to Mr. Shane Hodges.
- (e) Under APS No. 328372, AUTH No. 1252644, this Title V Operating Permit has been renewed for another 5-year term. Per this permit renewal:
- (1) The responsible official has been changed from Mr. Shane Hodges to Mr. Paul Holshouser.
 - (2) The permit contact has been changed from Mr. Jim Johnson to Ms. Heather Toth.
 - (3) Source IDs 102, 103, 104, and 107 were decommissioned and removed from the site.
- (f) Under APS No. 328372, AUTH No. 1365998, this Title V Operating Permit has been amended to incorporate Plan Approval No. 15-0104E, for the installation of the AMF Bun Line (Source ID 109). Additionally, the permit contact has been changed from Ms. Heather Toth to Ms. Stacy Hart.
- (g) Under APS No. 328372, AUTH No. 1401563, this Title V Operating Permit has been modified to reflect the renewal of the VOC Plantwide Applicable Limit (PAL) for another 10-year period.
- (h) Under APS No. 328327, AUTH No. 1487916, this Title V Operating Permit has been renewed for another 5-year term.



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