

Sulfur Dioxide (SO ₂)	0.08	0.01
Volatile Organic Compounds (VOC)	213.8	128.01
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2008 Actual Emissions
Methanol	1.63	0.63

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 213.8 tpy of VOCs. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Earthgrains of West Virginia, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited
	45CSR7	Particulate Matter emission limits
	45CSR11	Standby plans for emergency episodes
	45CSR13	Construction permit
	45CSR21	VOC emission limits
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting
	45CSR30	Operating permit requirement
	40 CFR Part 61	Asbestos inspection and removal
	40 CFR Part 63, Subpart ZZZZ	Reciprocating Internal Combustion Engine MACT
	40 CFR Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors
	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2005B	March 10, 2006	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit originally issued in 2005 and administratively updated in July 2009. The following changes have occurred since the most recent permit was issued:

45CSR§7-4.1. requires a PM emission limit based on process weight rate. The three baking ovens (1S, 2S, 3S) and the flour handling system (4S) do not meet any of the definitions of "Source Operation Type" listed in 45CSR§7-2.39. The flour handling system does not involve physical change and incorporates a pneumatic system to minimize PM emissions. The baking ovens do not involve chemical changes that result in the emission of particulate matter to the atmosphere. In addition, PM limits from the NSR permit are more stringent than the Rule 7 limits, therefore this requirement was removed, as well as the citation of 45CSR§7-8.1. in Permit Section 3.3.1. Similarly, 45CSR§7-3.1. requires an opacity limit on process source operations. Since the three baking ovens are not considered "source operations", and have a history of very low PM emissions, this requirement was removed from the permit.

45CSR§21-30 - The solvent parts washer is an existing "cold cleaning" type as it is defined in 45CSR§21-30.2.a. and is subject to 45CSR§21-30.3.a.. The applicable requirements were added to the Title V Permit.

45CSR42 - Greenhouse Gas Emissions Inventory Program was promulgated. Sections 3.1.10. and 3.5.10. were added to the permit.

Three existing sources were added to the Emissions Unit Table: Inkjet printing (5S) and two emergency generators (6S and 7S). The inkjet printers are used to mark product information on each bag of bread product. The inkjet printers do not have applicable requirements but are responsible for the methanol emissions that classify the facility as an area source of HAPs. The two emergency generators are subject to 40 CFR part 63, subpart ZZZZ, which became effective on May 3, 2010. The Reciprocating Internal Combustion Engine (RICE) MACT applies to major and area sources of HAPS. The two combustion ignition (CI) emergency generators are below 500 hp which exempts them from the emission limitations listed in Table 2b. The applicable sections from the MACT were added to the renewal Title V Permit in Section 5.0. Notifications, emissions limitations, and testing are not required, however the source must comply with operation, maintenance, recordkeeping and reporting requirements. The facility must comply with the MACT no later than May 3, 2013, and this is noted in the heading at Section 5.0.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR10 - R13-2005B lists Section 10.3.3, which applies to indirect heat exchangers, as a requirement for the ovens. The ovens at this facility are direct heat exchangers and are therefore considered to be manufacturing processes. The applicable rule is Section 10.4., however, the ovens are exempt in accordance with 45CSR§10-4.1.e. because the ovens have the potential to emit less than 500 pounds per year of sulfur oxides.

40 CFR Part 61 - The facility is not a major source of HAPs.

45CSR16 and 40 CFR Part 60 - The compression ignition (CI) internal combustion engines (ICE) were not constructed, modified, or reconstructed after July 11, 2005, therefore 40 CFR Part 60, Subpart IIII is not applicable.

45CSR27 - Facility does not emit toxic air pollutants nor does it have any sources that meet the category descriptions in the rule.

40 CFR Part 64 - The baking ovens are subject to emissions limitations for all the criteria pollutants, and are major sources for VOCs, but do not utilize control devices to achieve compliance. The Materials (flour) handling system utilizes a control device for PM, but is not a major source of PM emissions, or any other criteria pollutant. Therefore, in accordance with 40 CFR § 64.2(a), CAM is not applicable to this facility.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: October 5, 2010

Ending Date: November 4, 2010

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

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Response to Comments (Statement of Basis)

N/A