
Renewal Title V Operating Permit Application

**Bimbo Bakeries USA, Inc.
Huntington, WV**

May 2015

**Located at:
1300 Adams Avenue
Huntington, West Virginia 25704**

Project No. 152602.0043



16252 Westwoods Business Park Dr
Ellisville, MO 63021
(636) 256-7200 | Fax (636) 256-7202
www.syaeng.com

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TITLE V PERMIT APPLICATION

GENERAL FORMS



**WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL
PROTECTION**

DIVISION OF AIR QUALITY

601 57th Street SE

Charleston, WV 25304

Phone: (304) 926-0475

www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

| | |
|---|---|
| 1. Name of Applicant (As registered with the WV Secretary of State's Office): Bimbo Bakeries USA, Inc. | 2. Facility Name or Location: Bimbo Bakeries USA, Inc. |
| 3. DAQ Plant ID No.: 0 1 1 — 0 0 0 6 2 | 4. Federal Employer ID No. (FEIN): 7 5 2 4 9 1 2 0 1 |
| 5. Permit Application Type: <input type="checkbox"/> Initial Permit <input checked="" type="checkbox"/> Permit Renewal <input type="checkbox"/> Update to Initial/Renewal Permit Application When did operations commence? MM/DD/YYYY What is the expiration date of the existing permit? 11/22/2015 | |
| 6. Type of Business Entity: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Governmental Agency <input type="checkbox"/> LLC <input type="checkbox"/> Partnership <input type="checkbox"/> Limited Partnership | 7. Is the Applicant the: <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Both If the Applicant is not both the owner and operator, please provide the name and address of the other party. _____ _____ _____ |
| 8. Number of onsite employees: 235 | |
| 9. Governmental Code: <input checked="" type="checkbox"/> Privately owned and operated; 0 <input type="checkbox"/> County government owned and operated; 3 <input type="checkbox"/> Federally owned and operated; 1 <input type="checkbox"/> Municipality government owned and operated; 4 <input type="checkbox"/> State government owned and operated; 2 <input type="checkbox"/> District government owned and operated; 5 | |
| 10. Business Confidentiality Claims Does this application include confidential information (per 45CSR31)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY" guidance. | |

| | | |
|--|-----------------------------------|--------------------|
| 11. Mailing Address | | |
| Street or P.O. Box: 1300 Adams Avenue | | |
| City: Huntington | State: WV | Zip: 25704- |
| Telephone Number: (304) 523-8411 | Fax Number: (304) 525-9268 | |

| | | |
|--|----------------------------------|--|
| 12. Facility Location | | |
| Street: 1300 Adams Avenue | City: Huntington | County: Cabell |
| UTM Easting: 4252 km | UTM Northing: 371 km | Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18 |
| Directions: Interstate 64 to Adams Avenue exit; between Adams and Washington Avenue and between 13 th Street West And 14 th Street West | | |
| Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | If yes, for what air pollutants? |
| Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | If yes, name the affected state(s). Ohio Kentucky |
| Is facility located within 100 km of a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, do emissions impact a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | If yes, name the area(s). |
| ¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia. | | |

| | | |
|---|-----------------------------------|-------------------------------|
| 13. Contact Information | | |
| Responsible Official: Dean Jeffers | | Title: Plant Manager |
| Street or P.O. Box: 1300 Adams Avenue | | |
| City: Huntington | State: WV | Zip: 25704- |
| Telephone Number: (304) 523-8411 x265 | Fax Number: (304) 525-9268 | |
| E-mail address: djeffers@bbumail.com | | |
| Environmental Contact: Jeffery Barrett | | Title: Chief Engineer |
| Street or P.O. Box: 1300 Adams Avenue | | |
| City: Huntington | State: WV | Zip: 25704- |
| Telephone Number: (304) 523-8411 | Fax Number: (304) 525-9268 | |
| E-mail address: jbarrett2@bbumail.com | | |
| Application Preparer: Jennifer Markwardt | | Title: Senior Engineer |
| Company: Schreiber, Yonley & Associates, A Trinity Consultants Company | | |
| Street or P.O. Box: 16252 Westwoods Business Park Drive | | |
| City: Ellisville | State: MO | Zip: 63021- |
| Telephone Number: (636) 256-5652 | Fax Number: (636) 256-7202 | |
| E-mail address: jenniferm@syaeng.com | | |

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

| Process | Products | NAICS | SIC |
|-------------------|--------------------|--------|------|
| Commercial Bakery | Bread, buns, rolls | 311812 | 2051 |
| | | | |
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Provide a general description of operations.

Bimbo Bakeries USA, Inc. operates a commercial bread baking facility using flour, water, yeast, salt and other additive ingredients to manufacture bread, buns and rolls. The principal pollutant emitted from bread baking is VOC, emitted from the baking ovens as a result of yeast fermentation (of process sugars) and forming ethanol, carbon dioxide and other by-products. The baking ovens fire natural gas, and therefore additionally emit criteria pollutants associated with combustion. Ancillary operations include pneumatic flour transfer to bulk storage silos, natural gas-fired boilers (steam heat), emergency generators and bulk edible oil storage tanks.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

| 18. Applicable Requirements Summary | |
|--|--|
| Instructions: Mark all applicable requirements. | |
| <input checked="" type="checkbox"/> SIP | <input type="checkbox"/> FIP |
| <input checked="" type="checkbox"/> Minor source NSR (45CSR13) | <input type="checkbox"/> PSD (45CSR14) |
| <input checked="" type="checkbox"/> NESHAP (45CSR34) | <input type="checkbox"/> Nonattainment NSR (45CSR19) |
| <input type="checkbox"/> Section 111 NSPS | <input checked="" type="checkbox"/> Section 112(d) MACT standards |
| <input type="checkbox"/> Section 112(g) Case-by-case MACT | <input type="checkbox"/> 112(r) RMP |
| <input type="checkbox"/> Section 112(i) Early reduction of HAP | <input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e) |
| <input type="checkbox"/> Section 129 Standards/Reqts. | <input checked="" type="checkbox"/> Stratospheric ozone (Title VI) |
| <input type="checkbox"/> Tank vessel reqt., section 183(f) | <input checked="" type="checkbox"/> Emissions cap 45CSR§30-2.6.1 |
| <input type="checkbox"/> NAAQS, increments or visibility (temp. sources) | <input type="checkbox"/> 45CSR27 State enforceable only rule |
| <input checked="" type="checkbox"/> 45CSR4 State enforceable only rule | <input type="checkbox"/> Acid Rain (Title IV, 45CSR33) |
| <input type="checkbox"/> Emissions Trading and Banking (45CSR28) | <input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) |
| <input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39) | <input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40) |
| <input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41) | |

| 19. Non Applicability Determinations |
|--|
| <p>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</p> <p>45-1 – No “NO_x Budget Units” as defined by regulation</p> <p>45-2A – Fuel burning units have capacities less than 10 MMBTU/hr</p> <p>45-3 – Facility is not a “hot mix asphalt plant”</p> <p>45-5 – Facility not involved in coal handling or preparation</p> <p>45-6 – Facility not involved in the combustion of refuse</p> <p>45-8 – Emissions of SO_x/PM₁₀ insignificant; facility not located in SO_x/PM₁₀ nonattainment area</p> <p>45-10 – Ovens emit <500 lb/yr SO_x (4.1.e); boilers <10 MMBtu/hr (10.1)</p> <p>45-11 – Facility not located in region with Priority I or II pollutant as defined</p> <p>45-14 – Facility VOC PTE less than 250 tpy (PSD)</p> <p>45-16 and 40 CFR 60 NSPS – No applicable 40 CFR 60 NSPS</p> <p>45-17 – Specifically not applicable where covered by 45-2 and 45-7</p> |
| <input checked="" type="checkbox"/> Permit Shield |

19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

45-18 – Facility not involved in solid waste incineration

45-19 – Facility is not major for nonattainment pollutant (PM_{2.5})

45-20 – Permit emission limits not governed by stack heights

45-22 – Management fees governed by 45-30 for Title V facility

45-23 – Facility not MSW landfill

45-25 – Facility not a TSD facility

45-26 – Emergency generators do not produce electricity for sale

45-27 – Facility does not have any sources that meet the category descriptions in the rule

45-33 – Facility not an acid rain source

45-42 – Facility emits de minimis amounts of greenhouse gases

40 CFR 64 – Units above the major source threshold not subject to control requirements

40 CFR 68 – No storage of listed substances above threshold criteria

☒ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

45-4-3.1 (R13-2005D, Condition 3.1.4) – No objectionable odor to be caused by the discharge of air pollutants (state-enforceable only)

45-6-3.1 (R13-2005D, Condition 3.1.1) – Open burning prohibited

45-7-5.1, 45-7-5.2, 45-13 (R13-2005D, Condition 4.1.4) – Particulate matter control of plant premises and roadways

45-11-5.2 – Standby plan for reducing emissions

45-13-6.1, 45-7-8.1 – Future source testing when and where prescribed by WVDEP

45-21-40 – RACT emission limits and controls set in Permit R13-2005D (Condition 4.1.5)

45-29-4.1 – Annual emissions statement for certain sources (VOC>25 tpy, Cabell)

45-30 – TV Operating Permit requirements

45-30-8.7 – Certified Emissions Statement accounting for emissions of regulated pollutants

40 CFR 61 and 45CSR15 – Asbestos demolition or renovation

40 CFR 82 Subpart F – Stratospheric Ozone Protection (Recycling and Emission Reduction)

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45-4-3.1 – Facility will investigate where notified by WVDEP according to 45-4-5.1

45-6-3.1 – Open burning not conducted

45-7-5.2 – Facility shall water loading areas as necessary to control fugitive dust

45-13-6.1, 45-7-8.1 – Facility will conduct future source testing where required by WVDEP

45-11-5.2 – Facility shall prepare a plan for reducing emissions if requested by WVDEP

45-21-40 – Facility shall comply with applicable permit requirements

45-29-4.1 – Emissions statements submitted as required

45-30 – Facility complies with requirements of the TV Operating Permit

45-30-8.7 – Certified Emissions Statements submitted as required

40 CFR 61 and 45CSR15 – If asbestos removal projects are undertaken, the requirements of Subpart M will be followed

40 CFR 82 Subpart F – Facility complies with Subpart F requirements for Class I and Class II substances

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

21. Active Permits/Consent Orders

[illegible]

22. Inactive Permits/Obsolete Permit Conditions

[illegible]

Section 3: Facility-Wide Emissions

| 23. Facility-Wide Emissions Summary [Tons per Year] | |
|---|---------------------|
| Criteria Pollutants | Potential Emissions |
| Carbon Monoxide (CO) | 9.1 |
| Nitrogen Oxides (NO _x) | 11.39 |
| Lead (Pb) | 0.00 |
| Particulate Matter (PM _{2.5}) ¹ | 8.65 |
| Particulate Matter (PM ₁₀) ¹ | 8.65 |
| Total Particulate Matter (TSP) | 8.65 |
| Sulfur Dioxide (SO ₂) | 0.10 |
| Volatile Organic Compounds (VOC) | 224.3 |
| Hazardous Air Pollutants ² | Potential Emissions |
| Natural gas combustion HAPs | Negligible |
| | |
| | |
| | |
| | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions |
| N/A | |
| | |
| | |
| | |
| ¹ PM _{2.5} and PM ₁₀ are components of TSP. ² For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section. | |

Section 4: Insignificant Activities

| 24. Insignificant Activities (Check all that apply) | |
|--|---|
| <input checked="" type="checkbox"/> | 1. Air compressors and pneumatically operated equipment, including hand tools. |
| <input checked="" type="checkbox"/> | 2. Air contaminant detectors or recorders, combustion controllers or shutoffs. |
| <input checked="" type="checkbox"/> | 3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment. |
| <input checked="" type="checkbox"/> | 4. Bathroom/toilet vent emissions. |
| <input checked="" type="checkbox"/> | 5. Batteries and battery charging stations, except at battery manufacturing plants. |
| <input checked="" type="checkbox"/> | 6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description. |
| <input type="checkbox"/> | 7. Blacksmith forges. |
| <input checked="" type="checkbox"/> | 8. Boiler water treatment operations, not including cooling towers. |
| <input checked="" type="checkbox"/> | 9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source. |
| <input type="checkbox"/> | 10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process. |
| <input checked="" type="checkbox"/> | 11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources. |
| <input checked="" type="checkbox"/> | 12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel. |
| <input checked="" type="checkbox"/> | 13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment. |
| <input type="checkbox"/> | 14. Demineralized water tanks and demineralizer vents. |
| <input type="checkbox"/> | 15. Drop hammers or hydraulic presses for forging or metalworking. |
| <input type="checkbox"/> | 16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam. |
| <input type="checkbox"/> | 17. Emergency (backup) electrical generators at residential locations. |
| <input type="checkbox"/> | 18. Emergency road flares. |
| <input checked="" type="checkbox"/> | <p>19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO₂, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:</p> <p><u>Boilers – Calculations in Attachment I</u></p> <p><u>Solvent Parts Washer – Calculations in Attachment I</u></p> <p><u>Water heaters <300 MBtu/hr – Calculations in Attachment I</u></p> <p><u>Water heater 3.0 MMBtu/hr – Calculations in Attachment I</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> |

| 24. Insignificant Activities (Check all that apply) | |
|---|---|
| <input type="checkbox"/> | <p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> |
| <input type="checkbox"/> | 21. Environmental chambers not using hazardous air pollutant (HAP) gases. |
| <input checked="" type="checkbox"/> | 22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption. |
| <input type="checkbox"/> | 23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment. |
| <input type="checkbox"/> | 24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis. |
| <input type="checkbox"/> | 25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP. |
| <input checked="" type="checkbox"/> | 26. Fire suppression systems. |
| <input type="checkbox"/> | 27. Firefighting equipment and the equipment used to train firefighters. |
| <input type="checkbox"/> | 28. Flares used solely to indicate danger to the public. |
| <input checked="" type="checkbox"/> | 29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted. |
| <input type="checkbox"/> | 30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation. |
| <input type="checkbox"/> | 31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic. |
| <input type="checkbox"/> | 32. Humidity chambers. |
| <input type="checkbox"/> | 33. Hydraulic and hydrostatic testing equipment. |
| <input type="checkbox"/> | 34. Indoor or outdoor kerosene heaters. |
| <input type="checkbox"/> | 35. Internal combustion engines used for landscaping purposes. |
| <input type="checkbox"/> | 36. Laser trimmers using dust collection to prevent fugitive emissions. |
| <input type="checkbox"/> | 37. Laundry activities, except for dry-cleaning and steam boilers. |
| <input type="checkbox"/> | 38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities. |
| <input type="checkbox"/> | 39. Oxygen scavenging (de-aeration) of water. |
| <input type="checkbox"/> | 40. Ozone generators. |

| 24. Insignificant Activities (Check all that apply) | |
|---|--|
| <input checked="" type="checkbox"/> | 41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.) |
| <input type="checkbox"/> | 42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device. |
| <input checked="" type="checkbox"/> | 43. Process water filtration systems and demineralizers. |
| <input checked="" type="checkbox"/> | 44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification. |
| <input checked="" type="checkbox"/> | 45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified. |
| <input checked="" type="checkbox"/> | 46. Routing calibration and maintenance of laboratory equipment or other analytical instruments. |
| <input type="checkbox"/> | 47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers. |
| <input type="checkbox"/> | 48. Shock chambers. |
| <input type="checkbox"/> | 49. Solar simulators. |
| <input checked="" type="checkbox"/> | 50. Space heaters operating by direct heat transfer. |
| <input type="checkbox"/> | 51. Steam cleaning operations. |
| <input type="checkbox"/> | 52. Steam leaks. |
| <input type="checkbox"/> | 53. Steam sterilizers. |
| <input type="checkbox"/> | 54. Steam vents and safety relief valves. |
| <input checked="" type="checkbox"/> | 55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized. |
| <input checked="" type="checkbox"/> | 56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list. |
| <input checked="" type="checkbox"/> | 57. Such other sources or activities as the Director may determine. |
| <input type="checkbox"/> | 58. Tobacco smoking rooms and areas. |
| <input type="checkbox"/> | 59. Vents from continuous emissions monitors and other analyzers. |

Section 5: Emission Units, Control Devices, and Emission Points

| |
|---|
| 25. Equipment Table |
| Fill out the Title V Equipment Table and provide it as ATTACHMENT D . |
| 26. Emission Units |
| For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E . |
| For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F . |
| 27. Control Devices |
| For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G . |
| For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H . |

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Dean Jeffers

Title: Plant Manager

Responsible official's signature:

Signature: _____ Signature Date: _____
(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | ATTACHMENT A: Area Map |
| <input checked="" type="checkbox"/> | ATTACHMENT B: Plot Plan(s) |
| <input checked="" type="checkbox"/> | ATTACHMENT C: Process Flow Diagram(s) |
| <input checked="" type="checkbox"/> | ATTACHMENT D: Equipment Table |
| <input checked="" type="checkbox"/> | ATTACHMENT E: Emission Unit Form(s) |
| <input type="checkbox"/> | ATTACHMENT F: Schedule of Compliance Form(s) |
| <input checked="" type="checkbox"/> | ATTACHMENT G: Air Pollution Control Device Form(s) |
| <input checked="" type="checkbox"/> | ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s) |

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/dag, requested by phone (304) 926-0475, and/or obtained through the mail.

ATTACHMENT A

AREA MAP

ATTACHMENT A
AREA MAP
BIMBO BAKERIES USA, INC.

USGS 3 km NE of Westmoreland, West Virginia, United States 01 Jul 1985

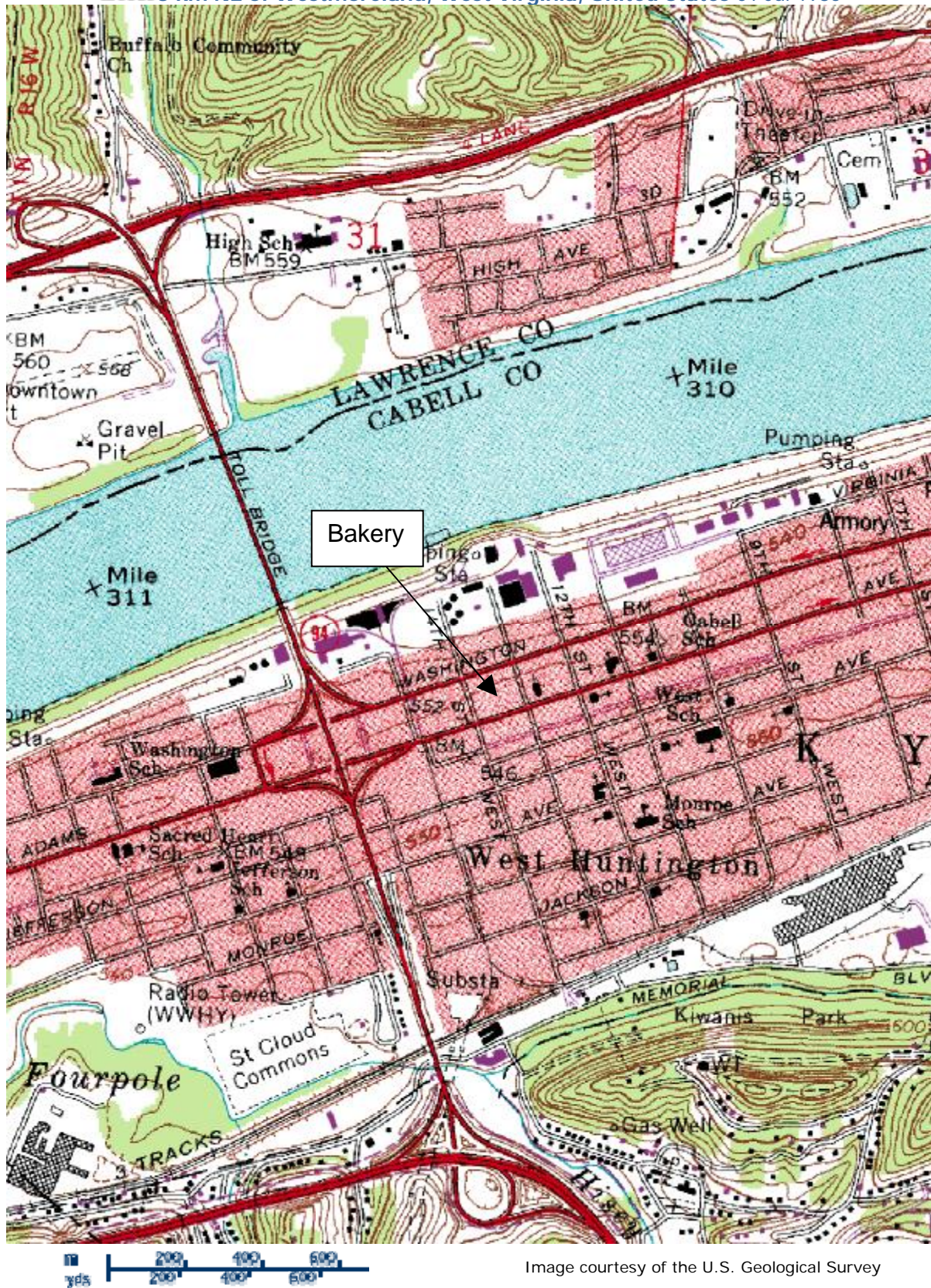


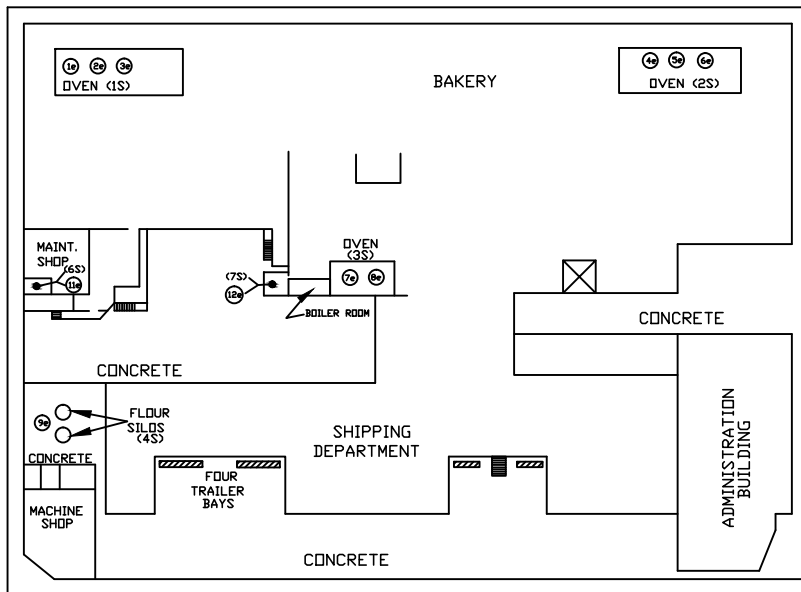
Image courtesy of the U.S. Geological Survey

ATTACHMENT B

PLOT PLAN

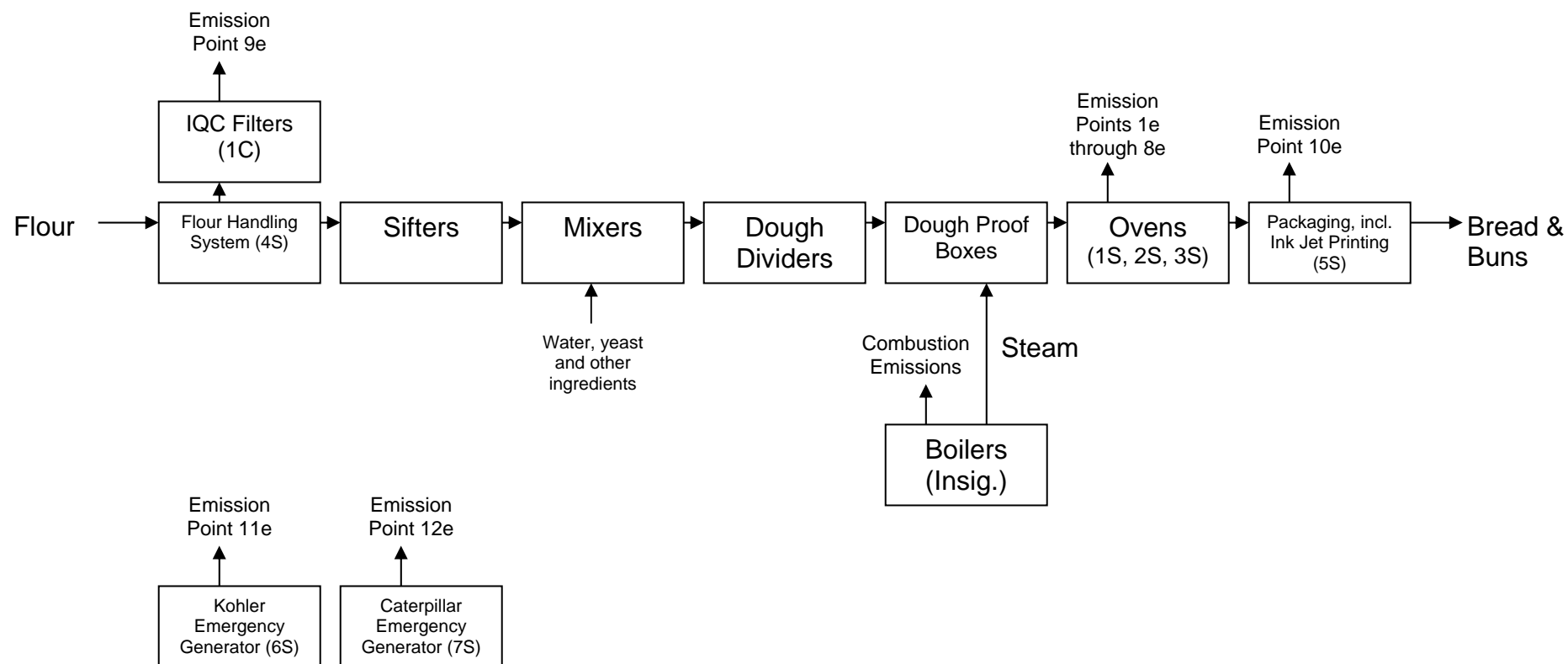
WASHINGTON AVENUE

14TH STREET WEST



ATTACHMENT C
PROCESS FLOW DIAGRAM

ATTACHMENT C
PROCESS FLOW DIAGRAM
BIMBO BAKERIES USA, INC.



ATTACHMENT D
EQUIPMENT TABLE

ATTACHMENT D - Emission Units Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

[illegible]

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E
EMISSION UNIT FORMS

ATTACHMENT E - Emission Unit Form

Emission Unit Description

| | | |
|---------------------------------------|---|--|
| Emission unit ID number: 1S | Emission unit name: 58 Tray Direct Fired Baker Perkins 970 Oven | List any control devices associated with this emission unit: N/A |
|---------------------------------------|---|--|

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Natural gas, direct fired, bread baking oven

| | | |
|---------------------------------------|-----------------------------|------------------------------|
| Manufacturer: Baker Perkins | Model number: 970 | Serial number: N/A |
|---------------------------------------|-----------------------------|------------------------------|

| | | |
|-----------------------------------|-----------------------------------|--------------------------------------|
| Construction date: 1991 | Installation date: 1991 | Modification date(s): 2001 |
|-----------------------------------|-----------------------------------|--------------------------------------|

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
15,000 lb/hr (baked goods)

| | | |
|---|---|---|
| Maximum Hourly Throughput: 15,000 lb/hr (baked goods) | Maximum Annual Throughput: 65,700 tpy (limited to 39,000 tpy) | Maximum Operating Schedule: 8,760 hr/yr |
|---|---|---|

Fuel Usage Data (fill out all applicable fields)

| | |
|--|---|
| Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired |
|--|---|

| | |
|---|---|
| Maximum design heat input and/or maximum horsepower rating: 5.940 MM Btu/hr | Type and Btu/hr rating of burners: Ribbon type 105 burners |
|---|---|

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Natural gas – 0.005940 MMCF/hr, 52.03 MMCF/yr (limited to 52 MMCF/yr)

Describe each fuel expected to be used during the term of the permit.

| Fuel Type | Max. Sulfur Content | Max. Ash Content | BTU Value |
|-------------|---------------------|------------------|---------------|
| Natural gas | <1% | Negligible | 1,000 Btu/scf |
| | | | |
| | | | |
| | | | |

| Emissions Data | | |
|---|---------------------|-------|
| Criteria Pollutants | Potential Emissions | |
| | PPH | TPY |
| Carbon Monoxide (CO) | 0.50 | 2.19 |
| Nitrogen Oxides (NO _x) | 0.60 | 2.60 |
| Lead (Pb) | 0.00 | 0.00 |
| Particulate Matter (PM _{2.5}) | 0.05 | 0.20 |
| Particulate Matter (PM ₁₀) | 0.05 | 0.20 |
| Total Particulate Matter (TSP) | 0.05 | 0.20 |
| Sulfur Dioxide (SO ₂) | 0.004 | 0.02 |
| Volatile Organic Compounds (VOC) | 45.8 | 119.1 |
| Hazardous Air Pollutants | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |
| | | |
| | | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Source Testing of June 27, 29 and 30, 1994
Source Testing of November 16 and 17, 1994
Source Testing of May 17 and 18, 1995
AP-42, Section 1.4 (July 1998)

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45-7-4.12 – Stack flow requirements

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – Fugitive particulate matter limit from manufacturing process

45-13 (R13-2005D, Condition 4.1.2) – Maximum emissions for criteria pollutants (except SO₂)

45-13 (R13-2005D, Condition 4.1.1) – Maximum production rates

45-13 (R13-2005D, Condition 4.1.3) – Maximum natural gas combustion rates

 X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45-7-4.12 – Stacks conform to applicable requirements

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – Oven fires only natural gas

45-13 (R13-2005D, Condition 4.1.2) – Emissions less than allowable

45-13 (R13-2005D, Condition 4.1.1) – Monthly production records (R13-2005D, Condition 4.4.4)

45-13 (R13-2005D, Condition 4.1.3) – Monthly natural gas combustion records (R13-2005D, Condition 4.4.5)

Are you in compliance with all applicable requirements for this emission unit? X Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

| | | |
|---------------------------------------|--|--|
| Emission unit ID number: 2S | Emission unit name: 38 Tray Direct Fired Teledyne Readco Oven | List any control devices associated with this emission unit: N/A |
|---------------------------------------|--|--|

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Natural gas, direct fired, bread baking oven

| | | |
|---|-----------------------------|------------------------------|
| Manufacturer: Teledyne Readco | Model number: N/A | Serial number: N/A |
|---|-----------------------------|------------------------------|

| | | |
|-----------------------------------|-----------------------------------|-------------------------------------|
| Construction date: 1974 | Installation date: 1974 | Modification date(s): N/A |
|-----------------------------------|-----------------------------------|-------------------------------------|

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
7,200 lb/hr (baked goods)

| | | |
|--|---|---|
| Maximum Hourly Throughput: 7,200 lb/hr (baked goods) | Maximum Annual Throughput: 31,536 tpy (limited to 18,720 tpy) | Maximum Operating Schedule: 8,760 hr/yr |
|--|---|---|

Fuel Usage Data (fill out all applicable fields)

| | |
|--|---|
| Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired |
|--|---|

| | |
|---|--|
| Maximum design heat input and/or maximum horsepower rating: 5.390 MM Btu/hr | Type and Btu/hr rating of burners: Ribbon type 76 burners |
|---|--|

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Natural gas – 0.005390 MMCF/hr, 47.22 MMCF/yr (limited to 39.5 MMCF/yr)

Describe each fuel expected to be used during the term of the permit.

| Fuel Type | Max. Sulfur Content | Max. Ash Content | BTU Value |
|-------------|---------------------|------------------|---------------|
| Natural gas | <1% | Negligible | 1,000 Btu/scf |
| | | | |
| | | | |
| | | | |

| Emissions Data | | |
|--|---------------------|------|
| Criteria Pollutants | Potential Emissions | |
| | PPH | TPY |
| Carbon Monoxide (CO) | 0.45 | 1.66 |
| Nitrogen Oxides (NO _x) | 0.54 | 1.98 |
| Lead (Pb) | 0.00 | 0.00 |
| Particulate Matter (PM _{2.5}) | 0.05 | 0.15 |
| Particulate Matter (PM ₁₀) | 0.05 | 0.15 |
| Total Particulate Matter (TSP) | 0.05 | 0.15 |
| Sulfur Dioxide (SO ₂) | 0.003 | 0.02 |
| Volatile Organic Compounds (VOC) | 24.8 | 64.4 |
| Hazardous Air Pollutants | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |
| | | |
| | | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |
| <p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Source Testing of June 27, 29 and 30, 1994 Source Testing of November 16 and 17, 1994 Source Testing of May 17 and 18, 1995 AP-42, Section 1.4 (July 1998)</p> | | |

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45-7-4.12 – Stack flow requirements

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – Fugitive particulate matter limit from manufacturing process

45-13 (R13-2005D, Condition 4.1.2) – Maximum emissions for criteria pollutants (except SO₂)

45-13 (R13-2005D, Condition 4.1.1) – Maximum production rates

45-13 (R13-2005D, Condition 4.1.3) – Maximum natural gas combustion rates

 X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45-7-4.12 – Stacks conform to applicable requirements

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – Oven fires only natural gas

45-13 (R13-2005D, Condition 4.1.2) – Emissions less than allowable

45-13 (R13-2005D, Condition 4.1.1) – Monthly production records (R13-2005D, Condition 4.4.4)

45-13 (R13-2005D, Condition 4.1.3) – Monthly natural gas combustion records (R13-2005D, Condition 4.4.5)

Are you in compliance with all applicable requirements for this emission unit? X Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

| | | |
|---------------------------------------|---|--|
| Emission unit ID number: 3S | Emission unit name: 18 Tray Single Lap Direct Fired Baker Perkins 970 Oven | List any control devices associated with this emission unit: N/A |
|---------------------------------------|---|--|

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Natural gas, direct fired, bread baking oven

| | | |
|---------------------------------------|-----------------------------|------------------------------|
| Manufacturer: Baker Perkins | Model number: 970 | Serial number: N/A |
|---------------------------------------|-----------------------------|------------------------------|

| | | |
|-----------------------------------|-----------------------------------|-------------------------------------|
| Construction date: 2001 | Installation date: 2001 | Modification date(s): N/A |
|-----------------------------------|-----------------------------------|-------------------------------------|

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
4,255 lb/hr (baked goods)

| | | |
|--|---|---|
| Maximum Hourly Throughput: 4,255 lb/hr (baked goods) | Maximum Annual Throughput: 18,640 tpy (limited to 11,000 tpy) | Maximum Operating Schedule: 8,760 hr/yr |
|--|---|---|

Fuel Usage Data (fill out all applicable fields)

| | |
|--|---|
| Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired |
|--|---|

| | |
|---|--|
| Maximum design heat input and/or maximum horsepower rating: 1.980 MM Btu/hr | Type and Btu/hr rating of burners: Ribbon type 18 burners |
|---|--|

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Natural gas – 0.001980 MMCF/hr, 17.34 MMCF/yr (limited to 17.3 MMCF/yr)

Describe each fuel expected to be used during the term of the permit.

| Fuel Type | Max. Sulfur Content | Max. Ash Content | BTU Value |
|-------------|---------------------|------------------|---------------|
| Natural gas | <1% | Negligible | 1,000 Btu/scf |
| | | | |
| | | | |
| | | | |

| Emissions Data | | |
|--|---------------------|------|
| Criteria Pollutants | Potential Emissions | |
| | PPH | TPY |
| Carbon Monoxide (CO) | 0.17 | 0.73 |
| Nitrogen Oxides (NO _x) | 0.20 | 0.87 |
| Lead (Pb) | 0.00 | 0.00 |
| Particulate Matter (PM _{2.5}) | 0.02 | 0.07 |
| Particulate Matter (PM ₁₀) | 0.02 | 0.07 |
| Total Particulate Matter (TSP) | 0.02 | 0.07 |
| Sulfur Dioxide (SO ₂) | 0.01 | 0.01 |
| Volatile Organic Compounds (VOC) | 14.6 | 37.8 |
| Hazardous Air Pollutants | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |
| | | |
| | | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |
| <p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Source Testing of June 27, 29 and 30, 1994 Source Testing of November 16 and 17, 1994 Source Testing of May 17 and 18, 1995 AP-42, Section 1.4 (July 1998)</p> | | |

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45-7-4.12 – Stack flow requirements

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – Fugitive particulate matter limit from manufacturing process

45-13 (R13-2005D, Condition 4.1.2) – Maximum emissions for criteria pollutants (except SO₂)

45-13 (R13-2005D, Condition 4.1.1) – Maximum production rates

45-13 (R13-2005D, Condition 4.1.3) – Maximum natural gas combustion rates

 X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45-7-4.12 – Stacks conform to applicable requirements

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – Oven fires only natural gas

45-13 (R13-2005D, Condition 4.1.2) – Emissions less than allowable

45-13 (R13-2005D, Condition 4.1.1) – Monthly production records (R13-2005D, Condition 4.4.4)

45-13 (R13-2005D, Condition 4.1.3) – Monthly natural gas combustion records (R13-2005D, Condition 4.4.5)

Are you in compliance with all applicable requirements for this emission unit? X Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

| | | |
|---------------------------------------|---|--|
| Emission unit ID number: 4S | Emission unit name: Flour Handling System | List any control devices associated with this emission unit: 1C |
|---------------------------------------|---|--|

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Pneumatic transfer (rail, truck) to bulk silos (2) for storage prior to delivery to bread and bun baking processes.

| | | |
|-------------------------------------|-----------------------------|------------------------------|
| Manufacturer: CST (Silos) | Model number: N/A | Serial number: N/A |
|-------------------------------------|-----------------------------|------------------------------|

| | | |
|--------------------------------------|--------------------------------------|-------------------------------------|
| Construction date: 11/2011 | Installation date: 11/2011 | Modification date(s): N/A |
|--------------------------------------|--------------------------------------|-------------------------------------|

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
Approximately 7.5 tons/hr (flour) to the mixers; 15 tons/hr input from delivery trucks and railcars

| | | |
|---|---|--|
| Maximum Hourly Throughput: 15 tons/hr input to the silos; 16.5 tons/hr (550 lb/min) into the facility | Maximum Annual Throughput: 65,700 tons (limited to 39,000 tons by production limits on ovens) | Maximum Operating Schedule: 8,760 hours/year |
|---|---|--|

Fuel Usage Data (fill out all applicable fields)

| | |
|--|---|
| Does this emission unit combust fuel? ___ Yes <u> X </u> No | If yes, is it? ___ Indirect Fired ___ Direct Fired |
|--|---|

| | |
|---|--|
| Maximum design heat input and/or maximum horsepower rating: N/A | Type and Btu/hr rating of burners: N/A |
|---|--|

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
N/A

Describe each fuel expected to be used during the term of the permit.

| Fuel Type | Max. Sulfur Content | Max. Ash Content | BTU Value |
|-----------|---------------------|------------------|-----------|
| N/A | | | |
| | | | |
| | | | |
| | | | |

| Emissions Data | | |
|--|---------------------|-----|
| Criteria Pollutants | Potential Emissions | |
| | PPH | TPY |
| Carbon Monoxide (CO) | | |
| Nitrogen Oxides (NO _x) | | |
| Lead (Pb) | | |
| Particulate Matter (PM _{2.5}) | 0.88 | 1.0 |
| Particulate Matter (PM ₁₀) | 6.6 | 7.8 |
| Total Particulate Matter (TSP) | 6.6 | 7.8 |
| Sulfur Dioxide (SO ₂) | | |
| Volatile Organic Compounds (VOC) | | |
| Hazardous Air Pollutants | Potential Emissions | |
| | PPH | TPY |
| N/A | | |
| | | |
| | | |
| | | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions | |
| | PPH | TPY |
| N/A | | |
| | | |
| | | |
| <p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>PM_{2.5}, PM₁₀ and TSP – from Frank Haile and Associates, a supplier of fabric filters, supplemented by AP-42, Appendix B.2, “General Particulate Size Distribution”</p> | | |

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45-7-3.7 – Visible emissions from storage structures (materials handling)

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – System required to minimize fugitive particulate from storage/materials handling

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45-7-3.7 – Facility maintains bulk silos dust collector according to manufacturer specifications

45-7-5.1, 45-13 (R13-2005D, Condition 4.1.4) – Facility maintains bulk silos dust collector according to manufacturer specifications

Are you in compliance with all applicable requirements for this emission unit? X Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

| | | |
|---------------------------------------|--|---|
| Emission unit ID number: 5S | Emission unit name: Ink Jet Printing | List any control devices associated with this emission unit: N/A |
|---------------------------------------|--|---|

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Ink jet printing of packaged baked goods

| | | |
|----------------------|----------------------|-----------------------|
| Manufacturer: | Model number: | Serial number: |
|----------------------|----------------------|-----------------------|

| | | |
|---|---|--|
| Construction date: MM/DD/YYYY | Installation date: MM/DD/YYYY | Modification date(s): MM/DD/YYYY |
|---|---|--|

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
Maximum usage is 0.01 gallons ink/hour and 0.05 gallons make-up fluid/hour.

| | | |
|---|--|--|
| Maximum Hourly Throughput: 0.06 gallons | Maximum Annual Throughput: 526 gallons | Maximum Operating Schedule: 8,760 hours/year |
|---|--|--|

Fuel Usage Data (fill out all applicable fields)

| | |
|--|---|
| Does this emission unit combust fuel? ___ Yes <u> X </u> No | If yes, is it? ___ Indirect Fired ___ Direct Fired |
|--|---|

| | |
|---|--|
| Maximum design heat input and/or maximum horsepower rating: N/A | Type and Btu/hr rating of burners: N/A |
|---|--|

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
N/A

Describe each fuel expected to be used during the term of the permit.

| Fuel Type | Max. Sulfur Content | Max. Ash Content | BTU Value |
|-----------|---------------------|------------------|-----------|
| N/A | | | |
| | | | |
| | | | |
| | | | |

| Emissions Data | | |
|--|---------------------|------|
| Criteria Pollutants | Potential Emissions | |
| | PPH | TPY |
| Carbon Monoxide (CO) | | |
| Nitrogen Oxides (NO _x) | | |
| Lead (Pb) | | |
| Particulate Matter (PM _{2.5}) | | |
| Particulate Matter (PM ₁₀) | | |
| Total Particulate Matter (TSP) | | |
| Sulfur Dioxide (SO ₂) | | |
| Volatile Organic Compounds (VOC) | 0.40 | 1.75 |
| Hazardous Air Pollutants | Potential Emissions | |
| | PPH | TPY |
| N/A | | |
| | | |
| | | |
| | | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions | |
| | PPH | TPY |
| N/A | | |
| | | |
| | | |
| <p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Material/mass balance</p> | | |

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

N/A

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

N/A

Are you in compliance with all applicable requirements for this emission unit? X Yes ___ No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

| | | |
|---------------------------------------|--|---|
| Emission unit ID number: 6S | Emission unit name: Kohler Emergency Generator | List any control devices associated with this emission unit: N/A |
|---------------------------------------|--|---|

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Diesel-fired emergency generator

| | | |
|--------------------------------|--|-------------------------------------|
| Manufacturer: Kohler | Model number: 571RSL7024BF-W | Serial number: WM 3747740 |
|--------------------------------|--|-------------------------------------|

| | | |
|-----------------------------------|-----------------------------------|-------------------------------------|
| Construction date: 1991 | Installation date: 1991 | Modification date(s): N/A |
|-----------------------------------|-----------------------------------|-------------------------------------|

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
350 kW

| | | |
|--|--|--|
| Maximum Hourly Throughput: 1.19 MMBtu/hr | Maximum Annual Throughput: 595 MMBtu (based on maximum operating schedule) | Maximum Operating Schedule: 500 hours/year (9/6/1995 EPA Memo) |
|--|--|--|

Fuel Usage Data (fill out all applicable fields)

| | |
|--|---|
| Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired |
|--|---|

| | |
|--|--|
| Maximum design heat input and/or maximum horsepower rating: 350 kW | Type and Btu/hr rating of burners: N/A |
|--|--|

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Diesel – 8.56 gallons/hour; 4,280 gallons/year

Describe each fuel expected to be used during the term of the permit.

| Fuel Type | Max. Sulfur Content | Max. Ash Content | BTU Value |
|-----------|---------------------|------------------|-----------------|
| Diesel | 0.05% | 0.01% | 139,000 Btu/gal |
| | | | |
| | | | |
| | | | |

| Emissions Data | | |
|--|---------------------|-----------|
| Criteria Pollutants | Potential Emissions | |
| | PPH | TPY |
| Carbon Monoxide (CO) | 0.0039 | 0.00098 |
| Nitrogen Oxides (NO _x) | 1.1 | 0.26 |
| Lead (Pb) | 0.000017 | 0.0000042 |
| Particulate Matter (PM _{2.5}) | 0.014 | 0.0036 |
| Particulate Matter (PM ₁₀) | 0.014 | 0.0036 |
| Total Particulate Matter (TSP) | 0.014 | 0.0036 |
| Sulfur Dioxide (SO ₂) | 0.039 | 0.0098 |
| Volatile Organic Compounds (VOC) | 0.00049 | 0.00012 |
| Hazardous Air Pollutants | Potential Emissions | |
| | PPH | TPY |
| All HAPs | 0.00154 | 0.000384 |
| | | |
| | | |
| | | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |
| <p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>AP-42, Section 3.1 (April 2000)</p> | | |

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines) and 45CSR34 – Operational standards including:

- Change oil and filter every 500 hours of operation or annually, whichever comes first [§63.6603(a); Table 2d, Item 4]
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first [§63.6603(a); Table 2d, Item 4]
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary [§63.6603(a); Table 2d, Item 4]
- Operate and maintain unit in a manner consistent with safety and good air pollution practices for minimizing emissions [§63.6605(b)]
- Limitations on hours of operation for non-emergency use [§63.6640(f)]
- Operate and maintain per manufacturer's recommendation or develop a maintenance plan [§63.6625(e)]
- Install a non-resettable hour meter [§63.6625(f)]
- Minimize engine start-up time to 30 minutes [§63.6625(h)]

 X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

40 CFR 63, Subpart ZZZZ and 45CSR34 – Monitoring/testing/recordkeeping/reporting requirements to ensure compliance with the rule are as follows:

- Keep operating limitation records [§63.6655(a)(1), (2), (4) and (5)]
- Keep records of maintenance conducted in order to demonstrate that the engine was maintained according to the maintenance plan [§63.6655(d)]
- Keep records of the hours of operation of the engine [§63.6655(f)]
- Report each instance when the engine did not meet each operating limitation in Table 2d [§63.6640(b)]

Are you in compliance with all applicable requirements for this emission unit? X Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

| | | |
|---------------------------------------|---|---|
| Emission unit ID number: 7S | Emission unit name: Caterpillar Emergency Generator | List any control devices associated with this emission unit: N/A |
|---------------------------------------|---|---|

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Diesel-fired emergency generator

| | | |
|-------------------------------------|------------------------------|-----------------------------------|
| Manufacturer: Caterpillar | Model number: SR-4 | Serial number: 48BH3203 |
|-------------------------------------|------------------------------|-----------------------------------|

| | | |
|--|--|-------------------------------------|
| Construction date: Mid 1970s | Installation date: Mid 1970s | Modification date(s): N/A |
|--|--|-------------------------------------|

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
260 kW

| | | |
|---|--|--|
| Maximum Hourly Throughput: 0.887 MMBtu/hr | Maximum Annual Throughput: 444 MMBtu (based on maximum operating schedule) | Maximum Operating Schedule: 500 hours/year (9/6/1995 EPA Memo) |
|---|--|--|

Fuel Usage Data (fill out all applicable fields)

| | |
|--|---|
| Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired |
|--|---|

| | |
|--|--|
| Maximum design heat input and/or maximum horsepower rating: 260 kW | Type and Btu/hr rating of burners: N/A |
|--|--|

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Diesel – 6.38 gallons/hour; 3,190 gallons/year

Describe each fuel expected to be used during the term of the permit.

| Fuel Type | Max. Sulfur Content | Max. Ash Content | BTU Value |
|-----------|---------------------|------------------|-----------------|
| Diesel | 0.05% | 0.01% | 139,000 Btu/gal |
| | | | |
| | | | |
| | | | |

| Emissions Data | | |
|--|---------------------|-----------|
| Criteria Pollutants | Potential Emissions | |
| | PPH | TPY |
| Carbon Monoxide (CO) | 0.0029 | 0.00073 |
| Nitrogen Oxides (NO _x) | 0.78 | 0.20 |
| Lead (Pb) | 0.000012 | 0.0000031 |
| Particulate Matter (PM _{2.5}) | 0.011 | 0.0027 |
| Particulate Matter (PM ₁₀) | 0.011 | 0.0027 |
| Total Particulate Matter (TSP) | 0.011 | 0.0027 |
| Sulfur Dioxide (SO ₂) | 0.029 | 0.0073 |
| Volatile Organic Compounds (VOC) | 0.00036 | 0.000091 |
| Hazardous Air Pollutants | Potential Emissions | |
| | PPH | TPY |
| All HAPs | 0.00114 | 0.000286 |
| | | |
| | | |
| | | |
| Regulated Pollutants other than Criteria and HAP | Potential Emissions | |
| | PPH | TPY |
| | | |
| | | |
| | | |
| <p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>AP-42, Section 3.1 (April 2000)</p> | | |

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines) and 45CSR34 – Operational standards including:

- Change oil and filter every 500 hours of operation or annually, whichever comes first [§63.6603(a); Table 2d, Item 4]
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first [§63.6603(a); Table 2d, Item 4]
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary [§63.6603(a); Table 2d, Item 4]
- Operate and maintain unit in a manner consistent with safety and good air pollution practices for minimizing emissions [§63.6605(b)]
- Limitations on hours of operation for non-emergency use [§63.6640(f)]
- Operate and maintain per manufacturer's recommendation or develop a maintenance plan [§63.6625(e)]
- Install a non-resettable hour meter [§63.6625(f)]
- Minimize engine start-up time to 30 minutes [§63.6625(h)]

 X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

40 CFR 63, Subpart ZZZZ and 45CSR34 – Monitoring/testing/recordkeeping/reporting requirements to ensure compliance with the rule are as follows:

- Keep operating limitation records [§63.6655(a)(1), (2), (4) and (5)]
- Keep records of maintenance conducted in order to demonstrate that the engine was maintained according to the maintenance plan [§63.6655(d)]
- Keep records of the hours of operation of the engine [§63.6655(f)]
- Report each instance when the engine did not meet each operating limitation in Table 2d [§63.6640(b)]

Are you in compliance with all applicable requirements for this emission unit? X Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT F

SCHEDULE OF COMPLIANCE FORMS
(NOT APPLICABLE)

ATTACHMENT G
AIR POLLUTION CONTROL DEVICE FORM

| ATTACHMENT G - Air Pollution Control Device Form | | |
|--|---|--------------------------------------|
| Control device ID number: 1C | List all emission units associated with this control device. 4S – Flour Handling System | |
| Manufacturer: Schick Tube-Veyor Corporation | Model number: ICY-8-1000 | Installation date: 11/2011 |
| Type of Air Pollution Control Device: | | |
| <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div> | | |
| List the pollutants for which this device is intended to control and the capture and control efficiencies. | | |
| Pollutant | Capture Efficiency | Control Efficiency |
| PM _{2.5} | 99.9% (estimated) | >99.98% (manufacturer) |
| PM ₁₀ | 99.9% (estimated) | >99.98% (manufacturer) |
| TSP | 99.9% (estimated) | >99.98% (manufacturer) |
| | | |
| Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Pneumatic transfer to bulk storage silos (2); insertable quick change (IQC) high efficiency filters: 794 cfm; 6 elements; 79.44 square feet filter area; spun bonded polyester with ePTFE membrane; replaceable and cleanable filters; exhaust temperature approximately 10 degrees F above ambient | | |
| Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification. The flour handling system utilizes a control device, but is not a major source of emissions, nor is it subject to a pollutant-specific emission limitation. | | |
| Describe the parameters monitored and/or methods used to indicate performance of this control device. Pressure drop observation and routine inspection conducted periodically (monthly at a minimum); filters cleaned or replaced as necessary; ongoing general site surveillance to proactively note any indication of visible emissions; equipment maintained according to manufacturer specifications | | |

ATTACHMENT H

COMPLIANCE ASSURANCE MONITORING (CAM) FORM

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at <http://www.epa.gov/ttn/emc/cam.html>

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to EACH regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet all of the following criteria (*If No, then the remainder of this form need not be completed*): ☐ YES ☒ NO

- a. The PSEU is located at a major source that is required to obtain a Title V permit;
- b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
 - Stratospheric Ozone Protection Requirements.
 - Acid Rain Program Requirements.
 - Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
 - An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).
- c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;
 - d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND
 - e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☐ RENEWAL APPLICATION. ALL PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). ONLY large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. ONLY large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) ^a BACKGROUND DATA AND INFORMATION

Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

| PSEU DESIGNATION | DESCRIPTION | POLLUTANT | CONTROL DEVICE | ^b EMISSION LIMITATION or STANDARD | ^c MONITORING REQUIREMENT |
|--------------------------------|-------------------|-----------|----------------|--|---|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| <u>EXAMPLE</u> Boiler No. 1 | Wood-Fired Boiler | PM | Multiclone | 45CSR§2-4.1.c.; 9.0 lb/hr | Monitor pressure drop across multiclone: Weekly inspection of multiclone |

^a If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

^b Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

^c Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA

Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. If more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.

| 4a) PSEU Designation: | 4b) Pollutant: | 4c) ^a Indicator No. 1: | 4d) ^a Indicator No. 2: |
|--|----------------|-----------------------------------|-----------------------------------|
| 5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators: | | | |
| ^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance: | | | |
| 5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy: | | | |
| ^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring: | | | |
| Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.): | | | |
| ^d Provide the <u>MONITORING FREQUENCY</u> : | | | |
| Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used: | | | |
| Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred: | | | |

^a Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

^b Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

^c The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

^d Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:

6b) Regulated Air Pollutant:

7) **INDICATORS AND THE MONITORING APPROACH:** Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

8) **INDICATOR RANGES:** Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how EACH indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

ATTACHMENT I

BACKUP INFORMATION AND CALCULATIONS

ATTACHMENT I

BACKUP INFORMATION AND CALCULATIONS

- I.1 Facility Background
- I.2 VOC Emissions from Yeast Fermentation
- I.3 Emissions Calculations for Combustion of Natural Gas
- I.4 Emissions Calculations for Emergency Generators
- I.5 Particulate Emissions from Flour Handling System
- I.6 VOC Emissions from Ink Jet Printing
- I.7 VOC Emissions from Solvent Parts Washer
- I.8 Summary of Air Emissions Calculations

I.1 Facility Background

This submittal represents Bimbo Bakeries USA, Inc.'s intent to file for a renewal of Title V Operating Permit R30-01100062-2010 (MM02) for the processes at the bakery located at:

1300 Adams Avenue
Huntington, West Virginia 25704

The emission units are separated into two categories - significant emission units and insignificant emission units. The insignificant units are identified as such in accordance with the Insignificant Activities list provided by the West Virginia Department of Environmental Protection. Each emission unit and associated maximum design rates are presented in Table I-1 below.

Table I-1. List of Emission Units.

| Emission Unit ID | Emission Point ID | Description of Unit | Maximum Design Rate |
|------------------|-------------------|---------------------------------|--|
| 1S | 1E, 2E, 3E | 58 Tray Baker Perkins 970 Oven | 5.940 million BTU/hr 15,000 lb bread/hr |
| 2S | 4E, 5E, 6E | 38 Tray Teledyne Readco Oven | 5.390 million BTU/hr 7.200 lb buns/hr |
| 3S | 7E, 8E | 18 Tray Baker Perkins 970 Oven | 1.980 million BTU/hr 4,255 lb buns/hr |
| 4S | 9E | Flour Handling System | 39,000 tons/year (limited) |
| 5S | 10E | Ink Jet Printing | |
| 6S | 11E | Kohler Emergency Generator | 350 kW |
| 7S | 12E | Caterpillar Emergency Generator | 260 kW |
| N/A | N/A | Solvent Parts Washer | |
| Insignificant | | Boiler No. 1 (Hurst) | 5.02 million BTU/hr |
| Insignificant | | Boiler No. 2 (Kewanee) | 4.2 million BTU/hr |
| Insignificant | | Water Heaters | < 300,000 BTU/hr |
| Insignificant | | Water Heater | 3.0 million BTU/hr |

Additional insignificant activities are identified in Section 4 of the General Forms.

I.2 VOC Emissions from Yeast Fermentation

Stack testing performed on the bakery ovens during 1994 and 1995 yielded an emission factor for the bread oven of 3.053 lb VOC/1,000 lb bread baked. Similarly, the emission factor for bun baking in the ovens was 3.437 lb VOC/1,000 lb buns baked. The maximum potential emissions from each oven are calculated below based on the maximum hourly throughput of the ovens and the limits imposed in the construction permit for the site (to comply with the State RACT requirements):

Table I-2. Potential VOC Emissions from Fermentation for Each Emission Unit

| Emission Unit | VOC Emission Factor (lb VOC/ton product) | Maximum Throughput (tons/hr) | Limited Throughput (tons/yr) | Potential VOC Emissions (lb/hr) | Potential VOC Emissions (tons/yr) |
|------------------|--|------------------------------|------------------------------|---------------------------------|-----------------------------------|
| 1S BP Bread Oven | 6.106 | 7.50 | 39,000 | 45.8 | 119.1 |
| 2S TR Bun Oven | 6.874 | 3.60 | 18,720 | 24.7 | 64.4 |
| 3S BP Bun Oven | 6.874 | 2.13 | 11,000 | 14.6 | 37.8 |

The potential to emit for the Bread Oven (1S) can be calculated:

$$(39,000 \text{ tons bread/yr}) \times (6.106 \text{ lbs VOC/ton bread}) \times (1 \text{ ton VOC} / 2000 \text{ lb VOC}) \\ = 119.1 \text{ ton VOC / yr}$$

I.3 Emissions Calculations for Combustion of Natural Gas

The maximum amount of fuel used in each of the combustion units was calculated by using the maximum design heat input rating for each unit and by assuming that the total amount of natural gas used at the facility was used in the listed units. The calculated fuel usage numbers are listed in Table I-3. The Maximum Hourly Design Rate (MHDR) is calculated based on the maximum design heat input rating for each oven and boiler, and AP-42 default heating values of natural gas (1,000 BTU / ft³). Potential emissions from combustion of the emission units are based on the MHDR calculated in Table I-3 multiplied by the emission factors for the fuel, from AP-42 (Section 1.4).

Table I-3. Maximum Design Rate for Each Bakery Oven and Boiler

| Emission Unit | Maximum Design Heat Input Rating (million BTU/hr) | Maximum Natural Gas Design Rate (MMCF/hr) | Limited Gas Usage Rate (MMCF/yr) |
|------------------|---|---|----------------------------------|
| 1S BP Bread Oven | 5.940 | 0.005940 | 52 |
| 2S TR Bun Oven | 5.390 | 0.005390 | 39.5 |
| 3S BP Bun Oven | 1.980 | 0.001980 | 17.3 |
| Boiler No. 1 | 5.02 | 0.00502 | N/A |
| Boiler No. 2 | 4.2 | 0.0042 | N/A |
| Water Heaters | 0.300 | 0.000300 | N/A |
| Water Heater | 3.0 | 0.0030 | N/A |

As an example, the maximum natural gas design rate for the Bread Oven is:

$$(5.940 \text{ MMBtu / hr}) \times (1 \text{ MMCF} / 1000 \text{ MMBtu}) = 0.005940 \text{ MMCF/hr}$$

Table I-4. Summary of Combustion Emissions from Natural Gas

| Pollutant | Emission Factor (lb/MMCF) | Potential Emissions (ton/yr) | | | | | | |
|-----------------|---------------------------|------------------------------|-------------|-------------|-------------|--------------|---------------|--------------|
| | | BP Bread Oven | TR Bun Oven | BP Bun Oven | Boiler No.1 | Boiler No. 2 | Water Heaters | Water Heater |
| PM | 7.6 | 0.20 | 0.15 | 0.07 | 0.17 | 0.14 | 0.010 | 0.10 |
| NO _x | 100 | 2.60 | 1.98 | 0.87 | 2.20 | 1.84 | 0.131 | 1.31 |
| SO ₂ | 0.6 | 0.02 | 0.02 | 0.01 | 0.01 | 0.01 | 0.0008 | 0.008 |
| CO | 84 | 2.19 | 1.66 | 0.73 | 1.8 | 1.5 | 0.11 | 1.1 |
| VOC | 5.5 | * | * | * | 0.12 | 0.10 | 0.0072 | 0.072 |

*Included in stack test results.

As an example, the maximum potential NO_x emissions for natural gas combustion in the bread oven are equal to:

$$(52 \text{ MMCF/yr}) \times (100 \text{ lbs NO}_x/\text{MMCF}) \times (0.0005 \text{ tons NO}_x/\text{lb NO}_x) = 2.60 \text{ tons NO}_x/\text{year}$$

All other pollutant actual and potential emissions are calculated in a similar manner. Negligible or trace amounts of HAPs may result from the combustion of natural gas. Based on emission rates published AP-42, Section 1.4, the approximate emission rate for formaldehyde is 0.0000735 lb/MMBTU. Per AP-42, formaldehyde is the most prevalent HAP generated from the combustion of natural gas.

I.4 Emissions Calculations for Emergency Generators

The two emergency generators on-site were originally designated as insignificant sources. However, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for

Reciprocating Internal Combustion Engines (RICE) was modified on March 3, 2010 to include stationary emergency engines at area sources of HAPs. Since the bakery is an area source, the generators will be subject to the standard (40 CFR 63 Subpart ZZZZ) starting on May 3, 2013.

The maximum amount of fuel used in each of the generators was calculated by using the maximum design heat input rating for each unit and a maximum hours of operation per year of 500 (September 6, 1995 memo from John S. Seitz regarding “Calculating Potential to Emit (PTE) for Emergency Generators”). The calculated fuel usage numbers are listed in Table I-5. The Maximum Hourly Design Rate (MHDR) is calculated based on the maximum kW input rating for each generator and the AP-42 default heating value of diesel (139,000 BTU / gallon). Potential emissions from combustion of the emission units in Table I-6 are based on the MHDR calculated in table I-5 multiplied by the emission factors for the fuel, from AP-42 (Section 3.1).

Table I-5. Maximum Design Rate for Each Emergency Generator

| Emission Unit | Maximum Design Heat Input Rating (million BTU/hr) | Maximum Diesel Design Rate (gallons/hr) |
|----------------------|---|---|
| Kohler (350 kW) | 1.19 | 8.56 |
| Caterpillar (260 kW) | 0.887 | 6.38 |

As an example, the maximum diesel design rate for the Kohler generator is:

$$(350 \text{ kW-hr}) \times (3,413 \text{ Btu/kW-hr}) \times (1 \text{ gallon} / 139,000 \text{ Btu}) = 8.56 \text{ gallons/hr}$$

Table I-6. Summary of Combustion Emissions from Diesel

| Pollutant | Emission Factor (lb/MMBtu) | Potential Emissions (lb/hr) | | Potential Emissions (ton/yr) | |
|-----------------------|----------------------------|-----------------------------|-------------|------------------------------|-------------|
| | | Kohler | Caterpillar | Kohler | Caterpillar |
| PM | 0.012 | 0.014 | 0.011 | 0.0036 | 0.0027 |
| NO _x | 0.88 | 1.1 | 0.78 | 0.26 | 0.20 |
| SO ₂ | 0.033 ¹ | 0.039 | 0.029 | 0.0098 | 0.0073 |
| CO | 0.0033 | 0.0039 | 0.0029 | 0.00098 | 0.00073 |
| VOC | 0.00041 | 0.00049 | 0.00036 | 0.00012 | 0.000091 |
| Lead | 0.000014 | 0.000017 | 0.000012 | 0.0000042 | 0.0000031 |
| All HAPs ² | 0.00129 | 0.00154 | 0.00114 | 0.000384 | 0.000286 |

¹1.01S or 0.033 for diesel-fired units.

²Sum of all HAPs listed in Tables 3.1-4 and 3.1-5 of AP-42.

As an example, the maximum potential PM emissions for diesel combustion in the Kohler generator are equal to:

$$\begin{aligned} (1.19 \text{ MMBtu/hr}) \times (0.012 \text{ lbs PM/MMBtu}) &= 0.014 \text{ pounds PM per hour} \\ (1.19 \text{ MMBtu/hr}) \times (0.012 \text{ lbs PM/MMBtu}) \times (500 \text{ hr/yr}) \times (1 \text{ ton}/2000 \text{ lb}) \\ &= 0.0036 \text{ tons PM per year} \end{aligned}$$

All other pollutant actual and potential emissions are calculated in a similar manner. Negligible or trace amounts of HAPs may result from the combustion of natural gas. Based on emission rates published AP-42, Section 1.4, the approximate emission rate for formaldehyde is 0.0000735 lb/MMBTU. Per AP-42, formaldehyde is the most prevalent HAP generated from the combustion of natural gas.

I.5 Particulate Emissions from Flour Handling System

Emissions from this emission unit are in the form particulate matter (PM_{2.5} and PM₁₀). Particulate matter is emitted at each transfer point in the flour handling system where air is vented through insertable quick change (IQC) filters on the silos or fabric filter bags. It should be noted that, with the exception of the outside silos, these transfer points do not vent directly to the atmosphere, but vent through the filter bags and into the building.

The filter bags are fabricated of a tightly woven fabric that allows air to pass, while typically retaining most or all of the particulate matter. Information provided by Frank Haile and Associates, a supplier of fabric-filter bags, indicated that 0.25 to 0.5 pounds of fine flour dust (i.e. PM₁₀) may escape through the filter media to the outside atmosphere for every 50,000 pounds of flour loaded or transferred. The facility has twenty different transfer points with air relief vents and the fabric filters: at the flour storage silos, at the sifters and at the mixers. Since the facility has twenty transfer points, the emission factor for the entire flour storage and transfer system is 0.40 lbs/ton of flour handled.

The maximum flour usage is limited to 39,000 tons/year. The corresponding maximum potential PM₁₀ emissions are calculated to be 7.8 tons/year. For PM_{2.5}, the maximum potential emissions are 1.0 tons/year using AP-42, Appendix B.2 to determine the particle size distribution.

The maximum hourly emissions were calculated using the bakery input capacity (550 lb/minute) and 20 transfer points:

$$(16.5 \text{ tph}) \times (0.40 \text{ lb PM/ton flour}) = 6.6 \text{ lb PM/hr}$$

$$(16.5 \text{ tph}) \times (0.0532 \text{ lb PM}_{2.5}/\text{ton flour}) = 0.878 \text{ lb PM}_{2.5}/\text{hr}$$

I.6 VOC Emissions from Ink Jet Printing

The facility currently operates ink jet coders to date stamp packaged products. The facility currently uses only Image ink and make-up fluid to imprint the date codes on the plastic packages.

For the ink and make-up fluid during 2014, approximately 33.29 gallons of ink and 332.86 gallons of make-up fluid were used for the printers. The VOC content of the ink is 6.172 lb/gallon, while the VOC content of the solvent is 6.753 lb/gallon.

Actual 2014 VOC Emissions:

$$33.29 \text{ gal} \times 6.172 \text{ lb/gal} + 332.86 \text{ gal} \times 6.753 \text{ lb/gal} \\ = 2,453 \text{ lb}$$

Since 60 gallons waste were collected and shipped off-site during 2014, the actual emissions were: 2,453 lb – 60 gal x 6.700 lb/gal (weighted average) = 2,050 lb = 1.03 tons

Similarly, 1.75 tons/year (0.40 pounds/hour) VOC was calculated as the maximum potential emissions based on a usage of 0.01 gallons/hour ink and 0.05 gallons/hour make-up solvent and no collection and removal of material from the facility.

MSDS for the ink and make-up fluid are provided in Attachment J.

I.7 VOC Emissions from Solvent Parts Washer

The facility maintains one (1) solvent parts washer for the cleaning of miscellaneous metal parts in the maintenance shop. During 2014, 134 gallons were added to the cleaner. The contractor who added and removed solvent didn't determine the amount of solvent removed from the parts washer during servicing, so the actual amount of solvent emitted to the atmosphere during 2014 cannot be determined by mass balance. The maximum potential emissions were calculated based on the total amount of solvent added to the cleaner being emitted to the atmosphere in a given year. The total emissions would be 134 gallons or 884 pounds VOC per year (0.44 tons VOC per year at a density of 6.6 lb/gallon). However, the maximum potential emissions from the previous application were 0.95 tons VOC per year (252 gallons), so the reported potential for this source is 0.95 tpy.

The MSDS for the solvent parts washer solvent is included in Attachment J.

I.8 Summary of Air Emissions Calculations

Table I-7 summarizes the potential emissions for all emission points at Bimbo Bakeries USA, Inc. The majority of emissions from the bread and bun baking processes are VOCs. Table I-7 represents the emissions from the facility based on limits imposed in the air construction permit and the current Title V Operating Permit for the facility.

Table I-7. Summary of Maximum Potential Emissions (Limited)

| Emission Unit | Description of Emission Unit | Maximum Potential Annual Emissions (tons/yr) | | | | |
|---------------|---------------------------------|--|-----------------|-----------------|------------|--------------|
| | | PM ₁₀ | NO _x | SO ₂ | CO | VOC |
| 1S | BP Bread Oven | 0.20 | 2.60 | 0.02 | 2.19 | 119.1 |
| 2S | TR Bun Oven | 0.15 | 1.98 | 0.02 | 1.66 | 64.4 |
| 3S | BP Bun Oven | 0.07 | 0.87 | 0.01 | 0.73 | 37.8 |
| 4S | Flour Handling System | 7.8 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5S | Ink Jet Printing | 0.00 | 0.00 | 0.00 | 0.00 | 1.75 |
| 6S | Kohler Emergency Generator | 0.004 | 0.26 | 0.010 | 0.001 | 0.00 |
| 7S | Caterpillar Emergency Generator | 0.003 | 0.20 | 0.007 | 0.001 | 0.00 |
| N/A | Solvent Parts Washer | 0.00 | 0.00 | 0.00 | 0.00 | 0.95 |
| Insig. | Boiler No. 1 | 0.17 | 2.20 | 0.01 | 1.8 | 0.12 |
| Insig. | Boiler No. 2 | 0.14 | 1.84 | 0.01 | 1.5 | 0.10 |
| Insig. | Water Heaters | 0.010 | 0.131 | 0.001 | 0.11 | 0.007 |
| Insig. | Water Heater | 0.10 | 1.31 | 0.008 | 1.1 | 0.072 |
| Total | | 8.65 | 11.39 | 0.10 | 9.1 | 224.3 |

ATTACHMENT J

MSDS



SAFETY DATA SHEET

1. Identification

Product identifier Crystal Clean 142 Mineral Spirits

Other means of identification

SDS number 915876

Recommended use Not available.

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Company name Heritage-Crystal Clean, LLC

Address 2175 Point Boulevard Suite 375
Elgin, IL 60123-9211

Telephone Technical Questions 877-938-7948

Website www.crystal-clean.com

E-mail cc_ehs@crystal-clean.com

Emergency phone number Chemtrec 800-424-9300

2. Hazard(s) identification

Physical hazards Flammable liquids Category 4

Health hazards Skin corrosion/irritation Category 2
Specific target organ toxicity, single exposure Category 3 narcotic effects

Environmental hazards Hazardous to the aquatic environment, acute hazard Category 2
Hazardous to the aquatic environment, long-term hazard Category 2

OSHA defined hazards Not classified.

Label elements



Signal word Warning

Hazard statement Combustible liquid. Causes skin irritation. May cause drowsiness or dizziness. Toxic to aquatic life. Toxic to aquatic life with long lasting effects.

Precautionary statement

Prevention Keep away from flames and hot surfaces-No smoking. Avoid breathing mist or vapor. Wash thoroughly after handling. Use only outdoors or in a well-ventilated area. Avoid release to the environment. Wear protective gloves/eye protection/face protection.

Response If skin irritation occurs: Get medical advice/attention. Take off contaminated clothing and wash before reuse. In case of fire: Use appropriate media for extinction. Collect spillage.

Storage Store in a well-ventilated place. Keep container tightly closed. Store in a well-ventilated place. Keep cool. Store locked up.

Disposal Dispose of contents/container in accordance with local/regional/national/international regulations.

Hazard(s) not otherwise classified (HNOC) None known.

Supplemental information

Not applicable.

3. Composition/information on ingredients

Substances

| Chemical name | Common name and synonyms | CAS number | % |
|---|--------------------------|------------|-----|
| Distillates (petroleum), hydrotreated light | | 64742-47-8 | 100 |

*Designates that a specific chemical identity and/or percentage of composition has been withheld as a trade secret.

4. First-aid measures

| | |
|---|--|
| Inhalation | Move to fresh air. Call a physician if symptoms develop or persist. |
| Skin contact | Remove contaminated clothing. Wash off with soap and plenty of water. If skin irritation occurs: Get medical advice/attention. |
| Eye contact | Rinse with water. Get medical attention if irritation develops and persists. |
| Ingestion | Rinse mouth. Call a POISON CENTER or doctor/physician if you feel unwell. |
| Most important symptoms/effects, acute and delayed | Vapors have a narcotic effect and may cause headache, fatigue, dizziness and nausea. Irritant effects. |
| Indication of immediate medical attention and special treatment needed | Provide general supportive measures and treat symptomatically. |
| General information | Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. |

5. Fire-fighting measures

| | |
|--|---|
| Suitable extinguishing media | Water fog. Dry chemical powder. Carbon dioxide (CO2). |
| Unsuitable extinguishing media | Do not use water jet as an extinguisher, as this will spread the fire. |
| Specific hazards arising from the chemical | The product is combustible, and heating may generate vapors which may form explosive vapor/air mixtures. |
| Special protective equipment and precautions for firefighters | Self-contained breathing apparatus and full protective clothing must be worn in case of fire. |
| Fire fighting equipment/instructions | Move containers from fire area if you can do so without risk. |
| Specific methods | Use standard firefighting procedures and consider the hazards of other involved materials. Use water spray to cool unopened containers. |
| General fire hazards | Combustible liquid. |

6. Accidental release measures

| | |
|--|--|
| Personal precautions, protective equipment and emergency procedures | Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Keep out of low areas. Eliminate all ignition sources (no smoking, flares, sparks, or flames in immediate area). Wear appropriate personal protective equipment. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS. |
| Methods and materials for containment and cleaning up | Eliminate all ignition sources (no smoking, flares, sparks, or flames in immediate area). Keep combustibles (wood, paper, oil, etc.) away from spilled material. Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Use a non-combustible material like vermiculite, sand or earth to soak up the product and place into a container for later disposal. Prevent entry into waterways, sewer, basements or confined areas. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. |
| Environmental precautions | Never return spills in original containers for re-use. For waste disposal, see section 13 of the SDS. Avoid release to the environment. Prevent further leakage or spillage if safe to do so. Do not contaminate water. Avoid discharge into drains, water courses or onto the ground. |

7. Handling and storage

Precautions for safe handling

Keep away from open flames, hot surfaces and sources of ignition. When using do not smoke. Avoid breathing mist or vapor. Avoid contact with skin. Avoid contact with eyes. Use only in well-ventilated areas. Wear appropriate personal protective equipment. Observe good industrial hygiene practices.

Conditions for safe storage, including any incompatibilities

Store locked up. Keep away from heat and sources of ignition. Keep container tightly closed. Store in a well-ventilated place.

8. Exposure controls/personal protection

Occupational exposure limits

US. NIOSH: Pocket Guide to Chemical Hazards

| Components | Type | Value |
|--|------|-----------|
| Distillates (petroleum), hydrotreated light (CAS 64742-47-8) | TWA | 100 mg/m3 |

Biological limit values

No biological exposure limits noted for the ingredient(s).

Appropriate engineering controls

Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

Individual protection measures, such as personal protective equipment

Eye/face protection

Wear eye/face protection. Wear safety glasses with side shields (or goggles).

Skin protection

Hand protection

Wear protective gloves.

Other

Wear appropriate chemical resistant clothing.

Respiratory protection

When workers are facing concentrations above the exposure limit they must use appropriate certified respirators.

Thermal hazards

Wear appropriate thermal protective clothing, when necessary.

General hygiene considerations

When using do not smoke. Keep away from food and drink. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance

Physical state

Liquid.

Form

Liquid.

Color

Clear to light blue.

Odor

Hydrocarbon.

Odor threshold

Not available.

pH

Not available.

Melting point/freezing point

Not available.

Initial boiling point and boiling range

> 366.8 °F (> 186 °C)

Flash point

> 142.0 °F (> 61.1 °C) Tag Closed Cup

Evaporation rate

Not available.

Flammability (solid, gas)

Not available.

Upper/lower flammability or explosive limits

Explosive limit - lower (%)

1

Explosive limit - upper (%)

6

Vapor pressure

< 1 mm Hg @ 20 C, 68 F

Vapor density

> 1

Relative density

0.78 - 0.81

Solubility(ies)

Solubility (water)

Not available.

| | |
|--|--------------------------|
| Partition coefficient (n-octanol/water) | Not available. |
| Auto-ignition temperature | > 440 °F (> 226.67 °C) |
| Decomposition temperature | Not available. |
| Viscosity | 1.69 cSt (77 °F (25 °C)) |
| Other information | |
| Percent volatile | 100 |
| VOC (Weight %) | 100 % |

10. Stability and reactivity

| | |
|---|---|
| Reactivity | The product is stable and non-reactive under normal conditions of use, storage and transport. |
| Chemical stability | Material is stable under normal conditions. |
| Possibility of hazardous reactions | No dangerous reaction known under conditions of normal use. |
| Conditions to avoid | Heat, flames and sparks. Avoid temperatures exceeding the flash point. |
| Incompatible materials | Strong oxidizing agents. |
| Hazardous decomposition products | No hazardous decomposition products are known. |

11. Toxicological information

Information on likely routes of exposure

| | |
|---------------------|--|
| Inhalation | Vapors have a narcotic effect and may cause headache, fatigue, dizziness and nausea. |
| Skin contact | Causes skin irritation. |
| Eye contact | Based on available data, the classification criteria are not met. |
| Ingestion | Based on available data, the classification criteria are not met. |

| | |
|---|--|
| Symptoms related to the physical, chemical and toxicological characteristics | Irritant effects. Symptoms of overexposure may be headache, dizziness, tiredness, nausea and vomiting. |
|---|--|

Information on toxicological effects

Acute toxicity

| Components | Species | Test Results |
|--|---------|----------------------|
| Distillates (petroleum), hydrotreated light (CAS 64742-47-8) | | |
| Acute | | |
| <i>Dermal</i> | | |
| LD50 | Rabbit | > 2000 mg/kg |
| <i>Inhalation</i> | | |
| LC50 | Rat | > 5.28 mg/l, 4 hours |
| <i>Oral</i> | | |
| LD50 | Rat | > 5000 mg/kg |

* Estimates for product may be based on additional component data not shown.

| | |
|--|---|
| Skin corrosion/irritation | Causes skin irritation. |
| Serious eye damage/eye irritation | Based on available data, the classification criteria are not met. |

Respiratory or skin sensitization

| | |
|----------------------------------|---|
| Respiratory sensitization | Due to lack of data the classification is not possible. |
| Skin sensitization | Due to lack of data the classification is not possible. |

| | |
|-------------------------------|--|
| Germ cell mutagenicity | No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic. |
|-------------------------------|--|

| | |
|------------------------|---|
| Carcinogenicity | This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA. |
|------------------------|---|

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

| | |
|------------------------------|---|
| Reproductive toxicity | Due to lack of data the classification is not possible. |
|------------------------------|---|

| | |
|---|---|
| Specific target organ toxicity - single exposure | Narcotic effects. |
| Specific target organ toxicity - repeated exposure | Based on available data, the classification criteria are not met. |
| Aspiration hazard | Due to lack of data the classification is not possible. |
| Chronic effects | Prolonged inhalation may be harmful. |

12. Ecological information

| | |
|--------------------------------------|---|
| Ecotoxicity | Toxic to aquatic life with long lasting effects. Accumulation in aquatic organisms is expected. |
| Persistence and degradability | No data is available on the degradability of this product. |
| Bioaccumulative potential | No data available for this product. |
| Mobility in soil | Not available. |
| Other adverse effects | No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component. |

13. Disposal considerations

| | |
|--|--|
| Disposal instructions | Do not allow this material to drain into sewers/water supplies. Dispose of contents/container in accordance with local/regional/national/international regulations. |
| Hazardous waste code | The waste code should be assigned in discussion between the user, the producer and the waste disposal company. |
| Waste from residues / unused products | Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions). |
| Contaminated packaging | Dispose in accordance with applicable federal, state, and local regulations. Return the empty cylinder to the supplier. |

14. Transport information

DOT

Not regulated as dangerous goods.

DOT BULK

BULK

| | |
|-------------------------------------|---|
| UN number | UN1268 |
| UN proper shipping name | Petroleum distillates, n.o.s. (Distillates (petroleum), hydrotreated light) |
| Transport hazard class(es) | |
| Class | 3 |
| Label(s) | 3 |
| Packing group | III |
| Special precautions for user | Read safety instructions, SDS and emergency procedures before handling. Read safety instructions, SDS and emergency procedures before handling. |
| Special provisions | 144, B1, IB3, T4, TP1, TP29 |
| Packaging exceptions | 150 |
| Packaging non bulk | 203 |
| Packaging bulk | 242 |

IATA

| | |
|-------------------------------------|---|
| UN number | UN1268 |
| UN proper shipping name | Petroleum Distillates, n.o.s. (Distillates (petroleum), hydrotreated light) |
| Transport hazard class(es) | |
| Class | 3 |
| Subsidiary risk | - |
| Packing group | III |
| Environmental hazards | Yes |
| Special precautions for user | Read safety instructions, SDS and emergency procedures before handling. Read safety instructions, SDS and emergency procedures before handling. |

IMDG

| | |
|-----------------------------------|---|
| UN number | UN1268 |
| UN proper shipping name | Petroleum Distillates, n.o.s. (Distillates (petroleum), hydrotreated light) |
| Transport hazard class(es) | |
| Class | 3 |
| Subsidiary risk | - |

| | |
|---|---|
| Packing group | III |
| Environmental hazards | |
| Marine pollutant | No. |
| EmS | Not available. |
| Special precautions for user | Read safety instructions, SDS and emergency procedures before handling. Read safety instructions, SDS and emergency procedures before handling. |
| Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code | Not available. |

15. Regulatory information

US federal regulations This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories Immediate Hazard - Yes
Delayed Hazard - Yes
Fire Hazard - Yes
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical Yes

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Distillates (petroleum), hydrotreated light (CAS 64742-47-8)

US. New Jersey Worker and Community Right-to-Know Act

Distillates (petroleum), hydrotreated light (CAS 64742-47-8)

US. Pennsylvania Worker and Community Right-to-Know Law

Distillates (petroleum), hydrotreated light (CAS 64742-47-8)

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins.

International Inventories

| Country(s) or region | Inventory name | On inventory (yes/no)* |
|-----------------------------|--|-------------------------------|
| Australia | Australian Inventory of Chemical Substances (AICS) | Yes |
| Canada | Domestic Substances List (DSL) | Yes |
| Canada | Non-Domestic Substances List (NDSL) | No |

| Country(s) or region | Inventory name | On inventory (yes/no)* |
|-----------------------------|--|------------------------|
| China | Inventory of Existing Chemical Substances in China (IECSC) | Yes |
| Europe | European Inventory of Existing Commercial Chemical Substances (EINECS) | Yes |
| Europe | European List of Notified Chemical Substances (ELINCS) | No |
| Japan | Inventory of Existing and New Chemical Substances (ENCS) | Yes |
| Korea | Existing Chemicals List (ECL) | Yes |
| New Zealand | New Zealand Inventory | Yes |
| Philippines | Philippine Inventory of Chemicals and Chemical Substances (PICCS) | Yes |
| United States & Puerto Rico | Toxic Substances Control Act (TSCA) Inventory | Yes |

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 22-January-2014
Revision date 11-February-2015
Version # 02
HMIS® ratings Health: 1
Flammability: 2
Physical hazard: 0

NFPA ratings



Disclaimer

The information in the sheet was written based on the best knowledge and experience currently available.