

# Puget Sound Clean Air Agency

1904 3rd Ave, Ste 105, Seattle, WA 98101-3317: Agata McIntyre (206) 689-4061

Point Source Emission Report

February 16, 2012

FRANZ SEATTLE DIVISION - WELLER ST.

Facility ID #: 10873

AFS#: 053-033-00873

## Section 4 - Facility Emission Summary

<u>CAS#</u>	<u>Flags</u>	<u>Air Contaminants:</u>	<u>pounds/2009</u>	<u>tons / 2009</u>	<u>pounds/2010</u>	<u>tons /2010</u>
64-17-5	V	Ethyl alcohol (Ethanol)	223,700	112	168,556	84
			=====	=====	=====	=====
		Volatile Organic Compounds Total (V)	223,700	112	168,556	84

# Puget Sound Air Pollution Control Agency

110 Union Street, Suite 500, Seattle, WA 98101-2038: David Lenington (206) 689-4061

## Emission Statement

August 26, 1997

### GAI'S SEATTLE FRENCH BAKING CO

File #: 10873

EPA AFS #: 033-0873

Location (KING County):

2006 S WELLS ST  
SEATTLE, WA 98144  
D WINGLE/JOE BURNS  
PLANT ENGINEER/CHIEF ENGINEER  
(206) 322-0931

Mailing Address:

PO BOX 24327  
SEATTLE, WA 98124-0327  
DONALD GAI  
DIRECTOR OF OPERATIONS  
(206) 329-3000

Standard Industrial Classification: 2051 BREAD AND OTHER BAKERY PRODUCTS

### Air Contaminant Emission Summary

<u>CAS#</u>	<u>Flags</u>	<u>Air Contaminants:</u>	<u>pounds/1995</u>	<u>pounds/1996</u>
64-17-5	VT	Ethyl alcohol (Ethanol)	<u>198,411</u>	<u>191,320</u>
		Volatile Organic Compounds Total (V)	198,411 (99 tons)	191,320 (96 tons)
		Toxic Air Contaminants Total (T)	198,411 (99 tons)	191,320 (96 tons)

### Emission Point/Segment Summary

Point 001 BREAD MAKING

Segment 01 SPONGE DOUGH

Segment 02 STRAIGHT RUN



PSAPCA JUL 18 1997

PRESTON GATES & ELLIS LLP  
ATTORNEYS

July 17, 1997

DL 7/18.  
David Lennington  
Air Operating Permit Program  
Puget Sound Air Pollution Control Agency  
110 Union Street, # 500  
Seattle, WA 98101

Re: Gai's Seattle French Baking Company

Dear Dave:

On behalf of Gai's I am submitting the following comments on the draft operating permit for Gai's Seattle French Baking Company.

**Draft Air Operating Permit**

Page 17, Section II.D and E

Do these sections refer to insignificant emission units under the operating permit rule? If so, it may not be appropriate for the permit to add monitoring requirements for them. The rule states that "[t]he permit shall not require testing, monitoring, reporting or recordkeeping for insignificant emission units or activities, except where generally applicable requirements of the state implementation plan specifically impose these requirements." WAC 173-401-530(2)(c). Unless the requirements in these sections (follow a fuel sulfur monitoring plan and burn only natural gas) are SIP requirements, there is no authority to impose them through the operating permit if the units that PSAPCA intends them to apply to are insignificant emission units.

Page 29, Section X

Gai's Seattle French Baking Company does not have more than a threshold quantity of any of the regulated substances listed in 40 CFR Part 68, and therefore

A LIMITED LIABILITY PARTNERSHIP INCLUDING OTHER LIMITED LIABILITY ENTITIES

ANCHORAGE • COEUR D'ALENE • LOS ANGELES • PORTLAND • SEATTLE • SPOKANE • HONG KONG • WASHINGTON, D.C.  
701 FIFTH AVENUE SUITE 5000 SEATTLE, WASHINGTON 98104-7078 206-623-7580 FX: 206-623-7022 www.prestongates.com



PSAPCA AUG 12 1997

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

AUG 11 1997

Reply To  
Attn Of: OAQ-107

Mr. David Lenington *WJ slr*  
Air Operating Permit Program  
Puget Sound Air Pollution Control Agency  
110 Union Street, #500  
Seattle, Washington 98101

Dear Mr. Lenington:

Thank you for the opportunity to review the draft air operating permit for Gai's Seattle French Baking Company. The permit was reviewed by me and Elizabeth Waddell, Environmental Scientist, and we received legal advice from Julie Vergeront, Assistant Regional Counsel for the Environmental Protection Agency (EPA). The permit looks very good, and I have the following comments:

1. In Section I, A and B (1), (2), and (3), under the column for "Emission Standard Reference Test Method", the test method must be more fully identified. Two examples are: Ecology Method 9A, "Source Test Manual - Procedures for Compliance Testing", State of Washington, Department of Ecology, July 12, 1990, and EPA Method 8, 40 CFR Part 60, Appendix A, July 1993.

2. In Section V, O. Recordkeeping, c), In the first sentence: "...for a period of five years from the date of the monitoring, sample, measurement, record or application", according to the citation it is really: "... for a period of five years from the date of the monitoring sample, measurement, report, or application".

If you have any questions or wish to discuss a comment further, please feel free to call me at (206) 553-6917.

Sincerely,

Lisa Jacobsen  
Environmental Engineer

Dave Lennington

July 17, 1997

Page 2

is not subject to this provision. Gai's will sign any certification statement that PSAPCA requires regarding the risk management program.

## Fact Sheet

### Page 2, Source Description

A minor point for factual clarity -- only a few of the heaters used by Gai's uses diesel backup. Please add the following underlined phrase to the first full paragraph on this page: "Gai's building is heated by natural gas with a few steam heaters using highway grade diesel backup."

### Page 4, Figure 1 (Sponge Dough Process)

The arrow pointing from blank space to "Proof" should be deleted and an arrow pointing from "Floor Time" to "Cut" should be added.

### Page 8, Figure 1 (Danish/Croissant)

Delete the word "overnight" after the word "retard." The retard process may be carried out during the day.

### Page 11, Section I.A, 3rd bullet

Not all ovens at the facility are direct fired. The following sentence, therefore, is not totally accurate: "It does not apply to the ovens because they are direct gas-fired units." As discussed previously, a solution would be to delete this sentence.

### Page 15, Section EU-2, 1st bullet

[Same comment as immediately above.]

### Emission Statement Attachment

Please make the following change on Emission Statements for Gai's Seattle French Baking Co. -- Donald Gai's title is "Director of Operations" not "Vice President."

Dave Lennington

July 17, 1997

Page 3

Gai's Baking Company appreciates the opportunity to provide these comments. Please call if you have any questions about them.

Very truly yours,

PRESTON GATES & ELLIS LLP

By



Kirk A. Lilley

cc: Dan Wingle



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
 KING COUNTY      KITSAP COUNTY      PIERCE COUNTY      SNOHOMISH COUNTY

August 26, 1997

Kirk Lilley  
 Preston Gates & Ellis LLP  
 701 5<sup>th</sup> Ave, Suite 5000  
 Seattle, WA 98104-7078

Dear Mr. Lilley:

Comments Regarding Gai's Seattle French Baking Company Draft Operating Permit

Thank you for your additional comments on the Gai's Draft Operating Permit during the public comment period. Here is our reply to your comments:

**Draft Air Operating Permit**

Page 17, Section II.D and E

These sections refer to the fuel received facility-wide. As such, any fuel burning activity must comply with the standard by these means. But since the fuel source is the same for all units, the records only need to be kept once and in one location. This also negates having to specify what quantity of fuel serves any one applicable unit. We believe these methods do not impose additional or separate monitoring requirements for insignificant emission units.

Page 29, Section X

If Gai's Seattle French Baking Company does not have more than a threshold quantity of any of the substances listed in 40 CFR Part 68, then they need to determine rule applicability and contact PSAPCA. They must specifically state that they are in compliance with or exempt from all the requirements of 40 CFR Part 68, including registration (40 CFR 60.160) and submission of the risk management plan (40 CFR 68.150 to 185). This provision cannot be changed or removed from the permit.

**Fact Sheet**

Page 2, Source Description

Change made

Page 4, Page 8

Change made

Dennis I. McLellan, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Charlotte Garrido, Commissioner, Kitsap County  
 Janet Chalupnik, Member at Large  
 Edward D. Hansen, Mayor, Everett

Lynn S. Honon, Mayor, Bremerton  
 R.C. "Swede" Johnson, Snohomish County Council  
 Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma  
 Norman B. Rice, Mayor, Seattle  
 Doug Sutherland, Pierce County Executive

Kirk Lilley  
Preston Gates & Ellis LLP  
August 26, 1997  
Page 2

Page 11, Page 15

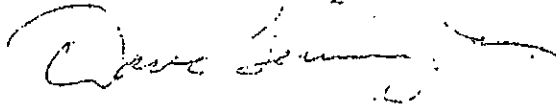
We meant to say: "It does not apply to the direct-fired gas ovens." From our phone conversation on Thursday, August 21, 1997, this appears to serve your purpose.

Emission Statement Attachment

We made the change to Donald Gai's title.

We have incorporated these changes into the Operating Permit and Fact Sheet. These documents are enclosed in their revised form. Again, thanks for your comments. We will send the final versions of each document to Gai's after the EPA comment period is over. Please call if you have any questions.

Sincerely,

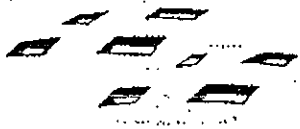


Dave Lenington  
Air Pollution Engineer

DJL:mj  
Enclosures

cc: D. S. Kircher  
J. M. Willenberg  
E. M. Gilpin





*Samish Indian Nation*  
OF WASHINGTON

PSAPCA JUL 08 1997

July 7, 1997

David Lenington *ALL 7/6/97*  
Air Operating Permit Program  
PSAPCA  
110 Union St., Suite 500  
Seattle, WA 98101

Dear Mr. Lenington:

Inquiring about permit application "Gai's Seattle French Baking Company; 2006 So. Weller St.; Seattle, WA 95144."

Questions:

- A) Please identify the "Volatile organic compounds" being emitted to outside air.
- B) What can be the consequence of "Volatile organic compounds" if a saturation point is made?
- C) What is the majority of direction of exhaust plume? Direction of prevailing winds?
- D) What or who are the recipients of down wind effects?

I await your answer. For your information our E-mail address is: "samish@fidalgo.net."

Sincerely,

Mac C. Oreiro, Jr.

MCO/dmf



# Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL  
TO CONSTRUCT, INSTALL, OR ESTABLISH

Notice of  
Construction No. 3261

Date JUL 25 1989

Two 125,000 lbs capacity Semco Flour Storage Silos (12' dia. by 40' high) controlled by two Semco bin vent baghouses at 650 cfm.

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A E Machado, GAPS SEATTLE FRENCH BAKING CO.

PO BOX 24327

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GAPS SEATTLE FRENCH BAKING CO.

PO BOX 24327

SEATTLE

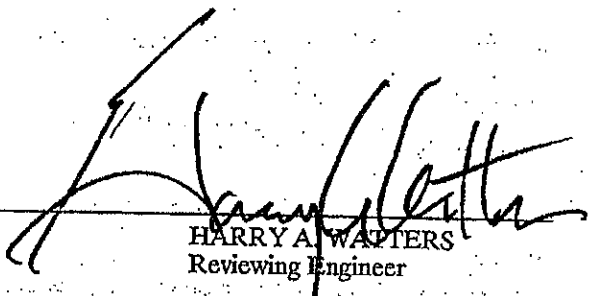
WA 98124-0327

## INSTALLATION ADDRESS


GAPS SEATTLE FRENCH BAKING CO., 2006 S WELLER ST, SEATTLE, WA, 98144

## THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install, alter or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
2. Compliance with this ORDER and its conditions does not relieve the owner or operator from the responsibility of compliance with Regulations I or II, RCW 70.94 or any other emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
3. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

  
HARRY A. WALTERS  
Reviewing Engineer

HW

  
Anita J. Frankel  
Air Pollution Control Officer



10913

# Puget Sound Air Pollution Control Agency

Notice of Construction No. 3313

## HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Date OCT 05 1981

One Donut Production System with Pillsbury/Moline 22-10S Automatic Continuous Proofer (9-compartment), Automatic Fryer (1385 dozen/hr) with two Maxon gas burners and a "V" grease filter bank.

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GAP'S SEATTLE FRENCH BAKING CO.  
PO BOX 24327  
SEATTLE WA 98124-0327

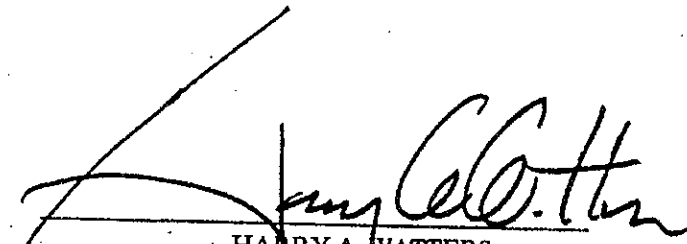
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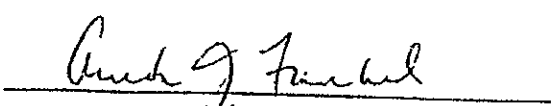
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 HARRY A. WATTERS  
 Reviewing Engineer  
 HW

  
 Anita J. Frankel  
 Air Pollution Control Officer

# Puget Sound Air Pollution Control Agency

Notice of  
Construction No. 3261

HEREBY ISSUES AN ORDER OF APPROVAL  
TO CONSTRUCT, INSTALL, OR ESTABLISH

Date **JUL 25 1989**

Two 125,000 lbs capacity Semco Flour Storage Silos (12' dia. by 40' high) controlled by two Semco bin vent  
baghouses at 650 cfm.

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A E Machado, GAP'S SEATTLE FRENCH BAKING CO.

PO BOX 24327

SEATTLE

WA 98124-0327

O GAP'S SEATTLE FRENCH BAKING CO.

W PO BOX 24327

N SEATTLE

E WA 98124-0327

## INSTALLATION ADDRESS


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3. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

  
HARRY A. WATERS  
Reviewing Engineer

HW

  
Anita J. Frankel  
Air Pollution Control Officer