Statement of Basis for
Franz Seattle Division –Weller St.
AOP 10873 Renewal
October 31, 2023

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1 Purpose of this Statement of Basis

1.1 General

This document summarizes the legal and factual bases for the permit conditions in the Franz Seattle Division – Weller St. (hereafter known as Franz Weller) air operating permit (AOP) to be issued under the authority of the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington, Chapter 173-401 of the Washington Administrative Code and Puget Sound Clean Air Agency (PSCAA) Regulation I, Article 7. Unlike the permit, this document is not legally enforceable. It includes references to the applicable statutory or regulatory provisions that relate to Franz Weller's emissions to the atmosphere. In addition, this Statement of Basis provides a description of Franz Weller's activities and a compliance history.

2 Why Franz Weller is an Air Operating Permit Source

Franz Weller is subject to the requirement to obtain an air operating permit because it is a "major source" as defined in Title V of the federal Clean Air Act (CAA) Amendments of 1990 and its implementing regulations, 40 CFR Part 70 and Chapter 173-401 WAC. A major source has the potential to emit more than 100 tons per year of any pollutant subject to regulation (CO, SO_2, NO_X, VOC, particulate matter, etc.), 10 tons per year or more of any single hazardous air pollutant (HAP) listed in Section 112(b) of the federal Clean Air Act (such as hydrochloric acid), or 25 tons per year or more of any combination of HAPs.

The facility has the potential to emit more than 100 tons per year of VOC and therefore is a major source for purposes of the Title V program. The main VOC emitted is ethanol, which is formed from the fermentation of sugars in the yeast-leavened bread baked at the facility. Potential emissions of VOC from this facility are 194.9 tons per year. Emissions of VOC (ethanol) from 15 Revent baking ovens at Franz are controlled by a recuperative catalytic oxidizer (RCO). Combustion emissions from the direct-fired burners on the Revent ovens, and all other combustion sources at the facility, are uncontrolled.

Potential emissions of all hazardous air pollutants (HAPs) listed under Section 112(b) of the Federal Clean Air Act are below the applicability thresholds of 10 tons per year for any single HAP, or 25 tons per year for all HAP combined, so Franz Weller is classified as an "area source" for HAP. HAP emissions from the facility are from combustion of natural gas and from the yeasted bread fermentation process. The total HAP emissions from natural gas combustion in the baking ovens and two boilers are less than 1 ton per year. Acetaldehyde, a HAP, is emitted as 1-3% of VOC emissions from fermentation of yeast-leavened bread[1]. Acetaldehyde potential to emit is under 5 tons per year when 3% of total VOC emissions are estimated to be acetaldehyde.

The facility does not have the potential to emit more than 250 tons per year of NO_X and CO and is not a "Major Stationary Source" under the Prevention of Significant Deterioration regulations as defined by 40 CFR 52.21.

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3 Source Description

Franz Weller Street operates a bread baking facility located in the Central District neighborhood of Seattle. The facility can operate 24 hours per day, 365 days per year. Currently, the plant is operating 1 to 3 eight-hour shifts per day, five to six days per week (up to 7,488 hours per year).

The facility consists of:

- Emission Unit 1: Direct Fired Baking Processes, consisting of:

[1] *Parrish, Charles R. & Ricks, Solomon. (1992) Determination of VOC, Ethanol, and Acetaldehyde Emissions from Commercial Bakeries Site 1-4 Test Report*

1) Natural Gas Fired Baker Perkins Tunnel Oven - 5,037,000 Btu/Hour (Currently Not in Use).
2) Natural Gas Fired Baker Perkins 38 Tray Oven - 4,740,000 Btu/Hour.
3) Natural Gas Fired Clock Griddle - 1,575,000 Btu/Hour.

- Emission Unit 2: Steam Generating Processes and Direct-fired Ovens, consisting of:
  1) Natural Gas Fired 200 Horsepower Kewanee Boiler, with diesel back-up - 8,000,000 Btu/Hour.
  2) Natural Gas Fired 400 Horsepower Cleaver Brooks Boiler, with diesel back-up - 16,000,000 Btu/Hour.
  3) Space heaters (natural gas only) - All below 10 MMBtu/HR Heat Input Rating.
  4) Nine Identical Natural Gas Fired Revent Rack Oven - 375,000 Btu/Hour, each.
- Emission Unit 3: Pillsbury/Moline 22-10S Donut Fryer.
- Emission Unit 4: Flour Storage and Transfer, consisting of:
  1) One double flour silo with fabric vent bags - 162,000 lbs total (Silos 1-2)
  2) Two flour storage silos each equipped with fabric breather bag on silo - 125,000 lbs each (silos 3 & 4).
  3) Four flour use bins, with filter controls – 48,000 lbs total.
- Emission Unit 5: Yeast-leavened Bread Products (Sour Dough Baking Line). Consisting of Fifteen Identical Natural Gas Fired Revent Rack Ovens - 380,000 Btu/Hour, each. Emissions of VOCs from the bread are controlled by one CSM Model 45A natural gas-fired catalytic oxidizer. Combustion emissions are not controlled.
- Other equipment at the facility that are considered insignificant emission units or do not emit air pollutants.

RCO Description:

The installed CSM Model 45A catalytic oxidizer has a design airflow of 4,500 scfm and is equipped with an LE 15 burner with 1.6 MMBtu/hr maximum capacity. Normal operation of the oxidizer burner is expected to be around 250,000-400,000 Btu/hr with a minimum of 100,000 Btu/hr. The oxidizer operating temperature range is 600-800 degrees F with a maximum temperature of 1,000 degrees F. The catalyst bed pressure drop is between 3 and 6 inches water, with system static pressure of 15-22 inches of water. The oxidizer residence time is a minimum 0.01 seconds. The LE 15 burner is designed to achieve an emissions rate of nitrogen oxides of no more than 30 ppmv @ 3% O_2.

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4 Permitting History

4.1 New Source Review Permitting for the Facility

A summary of the new source review permitting at the facility is provided below.

Notice of Construction #3261: Order of Approval No. 3261 was issued on July 25, 1989, for two,125,000 lbs capacity, Semco flour storage silos (12' dia. by 40' high) controlled by two Semco bin vent filters at 65 cfm.

Notice of Construction #3313: On October 5, 1989, Order of Approval No. 3313 was issued to Franz Weller for one donut production system with Pillsbury/Moline 22-10S automatic continuous proofer (9-compartment), automatic fryer (1,385 dozen/hr) with two Maxon gas burners, and a "V" grease filter bank.

Notice of Construction #11674: October 7, 2019, Order of Approval # 11674 was issued to Franz Weller for the installation of 15 Revent 620G 0.375 MMBtu/hr natural gas-fired ovens for baking yeast-leavened bread products with a capacity of baking a maximum of 121,392 pounds of product per day, and the installation of one CSM Model 45A 4,500 scfm catalytic oxidizer with a 1.6 MMBTU/hr natural gas burner for the control of emissions from the new ovens.

4.2 Regulatory Orders Issued to the Facility

No regulatory orders have been issued to the facility.

4.3 Prevention of Significant Deterioration

There have been no Prevention of Significant Deterioration permits issued for the facility.

4.4 Operating Permit Issuance and Renewal

4.4.1 Issuance of Original Permit

An air operating permit application was received by PSCAA from Franz Weller in 1995 pursuant to WAC 173-401-500(3), and the original final air operating permit was issued on November 10, 1997.

4.4.2 Renewal 1

On November 9, 2001, Franz Weller submitted an air operating permit renewal application. This was received on time with more than one year remaining on the active permit, which expired on November 10, 2002. On December 12, 2001, PSCAA sent a letter to Franz Weller indicating that the renewal application had been found to be complete. PSCAA issued the first renewal to Air Operating Permit No. 10873 to Franz Weller on June 11, 2003.

4.4.3 Renewal 2

On May 30, 2007, Franz Weller submitted an air operating permit renewal application. This was received on time with more than one year remaining on the active permit, which expired on June 11, 2008. On June 6, 2007, PSCAA sent a letter to Franz Weller indicating that the renewal application had been found to be complete. In accordance with WAC 173-401-705(2), Franz Weller operated under the authority of their application shield from June 11, 2008, until PSCAA issued the second renewal to the Air Operating Permit No. 10873 on June 13, 2012.

4.4.4 Renewal 3

On June 7, 2016, Franz Weller submitted an air operating permit renewal application. This was received on time with more than one year remaining on the active permit, which expired on June 13, 2017. On June 9, 2016, PSCAA sent a letter to Franz Weller indicating that the renewal application had been found to be complete. In accordance with WAC 173-401-705(2), Franz Weller continues to operate under the authority of their application shield from June 13, 2017, until the issuance of this third renewal to the Air Operating Permit No. 10873.

4.4.5 Administrative Amendment 1

On January 27, 2020, Franz Weller submitted an administrative amendment to update the Responsible Official on the permit. Although the third renewal of Air Operating Permit 110873 expired on June 13, 2017, PSCAA processed the administrative amendment to update the Responsible Official prior to completing the third renewal of the air operating permit. The administrative amendment was issued on February 26, 2020.

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5 Compliance History

The Franz Weller facility has been inspected roughly annually by the Puget Sound Clean Air Agency since 2012. Onsite inspections for Franz Weller since the last permit renewal were conducted on the following dates:

- June 18, 2012
- March 1, 2013
- December 16, 2013
- June 10, 2015
- June 9, 2016
- August 14, 2017
- June 26, 2018
- July 16, 2019
- August 21, 2020 (virtual inspection due to Covid-19)
- April 22, 2021 (virtual inspection due to Covid-19)
- March 14, 2022
- February 24, 2023

There have been no odor complaints filed with the Puget Sound Clean Air Agency naming the Franz Weller facility as a potential source of the odor.

The facility is required to perform stack testing on the recuperative catalytic oxidizer (RCO) exhaust stack on Yeast-leavened Bread Products (Sour Dough Baking Line) once every five years.

The Agency has issued 13 Notices of Violation to Franz Weller during the five years previous to this year of permit renewal issuance, as listed in Table 1, below.

Table 1. Notices of Violations

NOV No.	Violation Date	Issue Date	Facts Alleged
3-A000696	12/6/22	1/13/23	Failed to maintain inlet and outlet temperature of the catalyst bed at the required minimum of 600 degrees F for several days. Failed to take immediate and appropriate corrective action "including slowing or shutting down the emission unit as necessary to minimize emissions".
3-A000214	3/8/21	5/19/21	Per source report received 3/12/21 and follow-up response dated 3/19/21, the RCO was off-line for about 9 hours with continued facility oven operation. Problems found included 1) flame off in RCO, 2) flame controller malfunction, 3) tripping circuit breakers #1 and #5, 4) 2-3 gallons of water found in electrical conduit, 5) wiring wear from rubbing against nuts and 6) crushed wiring.

NOV No.	Violation Date	Issue Date	Facts Alleged
2-A000026	4/16/21	5/5/21	April 2021 deviation report received April 23, 2021 showing lapses in the continuous temperature chart recorder readings for the recuperative catalytic oxidizer (RCO). The time during which data was not collected was from about 9 AM 4/18/21 to 6 AM 4/19/21 and then 4/20/21 for about 8 hours. Leading to, and during, this event these issues occurred: the pens on the chart were drying out and the pens were replaced at the time the chart was changed on April 16. During the check on April 17 the new pens bled onto the chart which affected the readings. A new chart was installed on April 17 when this was noted. Then the chart recorder skipped recordings from about 9 AM on 4/18/21 until about 6 AM on 4/19/21, when the chart was changed out again. On 4/20/21, the chart recorder was again found to be skipping recordings. The facility specified that this was not the first time changing out the pens but is the first time issues with the pens were noted.
2-A000018	1/31/21 2/1/21 2/2/21 2/5/21 2/15/21	4/6/21	Per source report received on 3/12/2021, these deviations occurred: On 1/31/2021 and 2/1/2021 per OA 11674 Condition 11, Failure to continuously measure and record temperatures. On 2/1/2021 per OA 11674, Condition 4, recuperative catalytic oxidizer (RCO) was off (about 2 hours) during facility production operations. On 2/2/2021 per OA 11674, Condition 4, the RCO was off (until found and fixed at 0545 am) during facility production operations. On 2/5/2021 per OA 11674, Condition 4, the RCO was off (about a half hour) during facility production operations. On 2/15/21 the RCO was off (found at 0545 am and again around 1200 pm for about 10 min) during facility production operations.
3-009841	8/1/19	8/16/19	Failed to submit semi-annual compliance certification report for the certification period from Jan. 1, 2019 - June 30, 2019, electronically.
3-009838	6/30/19	7/26/19	Failed to report results of 2019 Q2 quarterly Method 9A opacity monitoring of the donut fryer using Ecology Method 9A within 30 days after the end of the month that the test occurred. A written copy of the test results was not received as required by Reg. I, Section 7.09(c).

NOV No.	Violation Date	Issue Date	Facts Alleged
3-009801	2/1/19	3/1/19	Failed to identify in the annual certification report the deviation from AOP 10873(V)(Q)(c)(3) for 2018Q1 when Franz Weller did not submit the results of the 2018Q1 Ecology Method 9A opacity observations within 30 days after the end of the month that the measurements occurred. Failed to properly certify report.
3-009800	2/1/19	2/19/19	Failed to submit the annual compliance certification report for the certification period from July 1, 2018 – December 31, 2018, electronically.
3-009799	2/1/19	2/19/19	Permittee lists zero reports were submitted for the reporting period July 1 2018 – December 31 2018; however, three reports need to be certified which were submitted during the reporting period: Annual Emission Inventory, 2018Q3 9A Opacity Monitoring Report and 2018Q4 9A Opacity Monitoring Report. In order to certify these three compliance reports, the certification document must specifically identify all documents subject to the certification per AOP 10873(V)(Q)(1)(c) and WAC 173-401-615(3)(a). The Responsible Official signed off that all reports submitted during the certification period which were not certified upon submittal were true, accurate and complete but did not specifically identify the reports that needed to be certified as required.
3-009798	2/1/19	2/19/19	Failed to submit semi-annual compliance certification report for the certification period from July 1, 2018 – December 31, 2018 electronically.
3-007538	5/31/18	8/16/18	Failed to report results of all opacity monitoring of the donut fryer using Ecology Method 9A within 30 days after the end of the month that the test occurred. Also failed to conduct the opacity monitoring of the donut fryer in accordance with Ecology Method 9A.
2-008142	2/1/18	6/4/18	Failed to submit semi-annual compliance certification report on-time.
2-008141	2/1/18	6/4/18	Failed to submit annual certification on-time.

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6 Potential to Emit and Actual Emissions Inventory

Emission inventories are estimates of actual emissions from the facility developed by the permittee and submitted to the Agency annually. Emissions from this facility are primarily VOC (ethanol) emissions released from the yeast-leavened dough during the baking process. The VOC emissions from the sour dough baking line (EU No. 5) are controlled by a recuperative catalytic oxidizer. The natural gas direct fired ovens emit uncontrolled VOC and minor combustion gas emissions (i.e., NO_X, SO_2, CO, PM). Emissions will vary from year to year depending on the amount of product made. Table 2 below shows

the actual emissions reported by the facility for the last five years. Per PSCAA Regulation 1, Article 7.09, actual emissions of criteria pollutants less than 25 tons per year are not required to be reported.

Table 2. Emission Inventory Summary (tons per year)

Pollutant	2017	2018	2019	2020	2021
Volatile Organic Compounds (VOC)	94.17	104.34	92.34	87.29	93.87

The facility-wide potential emissions of VOC from the ovens and from natural gas combustion equipment emissions is estimated to be less than 195 tons per year. The emissions of criteria pollutants from the natural gas combustion equipment is estimated to be well below the reporting thresholds and are not anticipated to affect facility applicable requirements.

7 Compliance Assurance Monitoring, NESHAP and NSPS Applicability Review

7.1 Compliance Assurance Monitoring

The Compliance Assurance Monitoring (CAM) rule requires owners and operators to monitor the operation and maintenance of their control equipment, so they can evaluate the performance of their control devices and ensure they are working properly. If owners and operators of these facilities find that their control equipment is not working properly, the CAM rule requires them to take action to correct any malfunctions and to report such instances to the appropriate enforcement agency, PSCAA in this case. Additionally, the CAM rule provides some enforcement tools that allow environmental agencies to require facilities to respond appropriately to the monitoring results to ensure pollution control operations are as effective as represented by the facility.

The CAM rule applies at major sources with emission units that have control devices and emissions that could exceed major source thresholds if the control device was not operated. In accordance with 40 CFR Part 64, any emission unit that meets all three of the following criteria, and is not exempt under the CAM rule, requires a CAM Plan:

- The unit is subject to an emission limitation or standard for the applicable regulated air pollutant. [40 CFR 64.2(a)(1)]
- The unit uses a control device to achieve compliance with any such emission limitation or standard. [40 CFR 64.2(a)(2)]
- The unit has potential pre-control device emissions of the applicable pollutant of at least 100% of the major source amount. [40 CFR 64.2(a)(3)].

Franz Weller has two different emission units with control equipment: EU 4 consisting of three flour storage silos with fabric breather bags for particulate matter (PM); and EU 5 consisting of 15, Revent 620G, 0.375 MMBtu/hr, direct fired natural gas ovens equipped with a recuperative catalytic oxidizer (RCO) for VOC controls. EU-1, EU-2 and EU-3 consist of emission units without control devices and are not further analyzed for CAM applicability. Table 4 summarizes the CAM applicability for EU-4 and EU-5.

Table 3. CAM Applicability Summary

EU ID and Description	CAM Regulated Pollutant	Pre-Control PTE (tpy)	Post-Control PTE (tpy)	Control Device	Emission Limit	Compliance Demonstration	Regulatory Citation	CAM Applies?
EU-4: Two flour storage silos, each rated at 125,000 lb. capacity	Particulate Matter	<1	NA	Fabric Breather Bag	0.05 gr/dscf from equipment used in manufacturing process	AOP 10873 Fabric Filter Inspections	PSCAA Regulation I 9.09	No; pre-control PTE below 100 TPY

EU ID and Description	CAM Regulated Pollutant	Pre-Control PTE (tpy)	Post-Control PTE (tpy)	Control Device	Emission Limit	Compliance Demonstration	Regulatory Citation	CAM Applies?
Four flour use bins, each rated at 9,056 cubic feet (cf) capacity One flour silo rated at 170,000 lb. capacity								
EU-5: 15, Revent 620G, 0.375 MMBtu/hr., natural gas-fired ovens with a capacity of baking a maximum of 121,392 pounds of product per day	VOC	37.7	1.9	4,500 CFM recuperative catalytic oxidizer.	95% minimum VOC control efficiency	AOP 10873 2.30 VOC Source Testing AOP 10873 2.23, 2.24, 2.25. 2.27 & 2.28 RCO Monitoring	Order of Approval 11674 #7	No; pre-control PTE below 100 TPY

7.1.1 EU-4 Flour Silos and Use Bins

The flour silos at Franz Weller have filter bags attached to the top of each silo to control flour emissions during filling operations. Flour emissions could occur primarily when the silos are filled. The silos are passively vented such that no fans draw air through the filters. The flour silos can emit PM and are subject to a 0.05 gr/dscf particulate matter limit as required in PSCAA Regulation I Section 9.09.

The largest silos at this facility have a capacity of 125,000 lbs flour and are equipped with baghouses rated at 650 cfm. Calculations assume that the baghouses conservatively emit particulate matter at the grain loading limit in Agency rule. Actual emissions are much less, as the silos only emit PM when they are being filled, which does not happen continuously. Worst case allowable emissions from each silo are:

[(0.05 gr/scf) x (lb/7,000 gr) x (650 ft3 /min) x (60 min/hr) x (8760 hr/yr) x (ton/2000 lb)]

= 1.22 tpy

This worst case emission rate would not come close to the major threshold of 100 tons/year. Therefore it is clear that the silo units do not require a CAM Plan. In addition, the calculation assumes that the baghouses are operating all the time; however, this is not realistic and the emission would be much smaller. Furthermore, the breather vent filters on these silos are considered to be inherent process equipment, which provides an exemption from CAM.

7.1.2 15 – 0.375 MMBtu/hr Direct Fired Ovens

The uncontrolled VOC emissions from the 15, 0.375 MMBtu/hr, direct fired natural gas ovens were calculated as part of the review of NOC 11674 as 37.7 tons/year as calculated using a worst case VOC bread baking emission factor of 3.4 lb/ton product derived from Franz Weller's Late Bake Auto Sour formula. As the uncontrolled emissions from these ovens are below 100 tons per year, they do not meet the criteria for requiring a CAM Plan.

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7.2 NESHAP Applicability

The Franz Weller facility is an area source of HAP. As part of the renewal process, PSCAA reviewed federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for area sources that might apply to this facility to determine applicability. PSCAA determined that Franz Weller is not subject to any federal NESHAP.

7.2.1 Inapplicable NESHAPs

Other NESHAPs reviewed for potential applicability and determined to be inapplicable are listed below in Table 5. This is not an exhaustive list of all NESHAPs but ones that might apply to this facility based on current operations.

Table 4. Inapplicable NESHAPs

Regulation	Description	Basis for Inapplicability
40 CFR Part 63 Subpart JJJJJJ	Industrial, Commercial and Institutional Boilers and Process Heaters Area Source NESHAP	This NESHAP applies to area source of HAP. However, the 8.0 MMBtu/hr and 16 MMBtu/hr boilers at the facility fire natural gas only, so both boilers meet the definition of "gas-fired boiler" as defined in 40 CFR 63.11237. Gas-fired boilers are exempt from all the requirements in the NESHAP as specified in 40 CFR 63.11195.
40 CFR Part 63 Subpart DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP.	The permittee is a natural minor source of HAP. This NESHAP only applies to major sources of HAP.

7.3 NSPS Applicability

As part of the renewal process, PSCAA reviewed federal New Source Performance Standards (NSPS) that might apply to this facility to determine applicability. PSCAA determined that Franz Weller is not subject to any federal NSPS.

7.3.1 Inapplicable NSPS

Other NSPS reviewed for potential applicability and determined to be inapplicable are listed below in Table 6. This is not an exhaustive list of all NSPS but ones that might apply to this facility based on current operations.

Table 5. Inapplicable NSPS

Regulation	Description	Basis for Inapplicability
40 CFR Part 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	The 16 MMBtu/hr Cleaver Brooks boiler was constructed in 1977, which is prior to the 1989 applicability date of Subpart Dc. The 8 MMBtu/hr Kewaunee boiler is less than the 10 MMBtu/hr applicability threshold for Subpart Dc.

None of the other units at Franz - Weller has a capacity greater than 10 MMBtu/hr. The equipment at Franz - Weller is not subject to any NSPS.

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8 Explanation of Applicable Requirements Tables and Compliance Methods

Applicable requirements are listed in several sections of this operating permit as outlined below. The permit only lists the requirements that PSCAA has determined to be within the scope of the definition of "applicable requirements" under the operating permit program. Franz Weller is legally responsible for complying with all applicable requirements of the operating permit as well as other requirements that do

not fit the definition of “applicable requirements” found in Chapter 173-401 Washington Administrative Code (WAC). Some of the applicable requirements contain terms or monitoring, maintenance and recordkeeping conditions for which an explanation is included in this statement of basis. The specific requirements are listed below, along with any necessary explanations in monitoring, maintenance, and recordkeeping conditions.

Applicable requirements that are not ongoing are not included in the permit because they are not in effect during the term of the permit and are considered obsolete.

A condition was added for each emission unit that has an active Order of Approval to include Condition 1 from each of the Orders. This condition states, “Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install 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 the Puget Sound Clean Air Agency.” This condition was added into the permit to make it clear that the facility is always required to install and establish only that which was approved by the Order of Approval. Any changes to anything that was included in the Notice of Construction and/or Order of Approval would need to go through the New Source Review process.

8.1 Requirement Tables

Sections 1 and 2 of the permit have applicable requirements set up in tables. Section 1 contains the requirements that apply facility-wide to all the emission units regulated by this permit. These requirements also apply to emission units identified in Section 2 of the permit. If the compliance method for any requirement in Section 1 is more extensive for a specific emission unit, that requirement is repeated in Section 2 of the permit with the additional monitoring, maintenance and recordkeeping requirements.

The tables list the citation for the “applicable requirement” and the effective date in the second column. In some cases, the effective dates of the “Federally Enforceable” requirement and the “*State Only*” requirement are different because either the state (or local authority) has not submitted the regulation to the Environmental Protection Agency (EPA) for approval into the State Implementation Plan (SIP), or the state (or local authority) has submitted it and the EPA has not yet approved it. “*State Only*” effective dates are in italicized font and shall be understood to include the Washington Department of Ecology and PSCAA. When the EPA does approve the new requirement into the SIP, the old requirement will automatically be replaced and superseded by the new requirement. The new requirement will be enforceable by the EPA as well as PSCAA from the date that it is adopted into the SIP, and the old requirement will no longer be an applicable requirement.

The requirement tables in Sections 1 and 2 also contain a brief description of the applicable requirement. This description is not an enforceable condition. In the event of conflict or omission between the information contained in the brief description and the actual statute or regulation cited, the requirements and language of the actual statute or regulation cited shall govern. For more information regarding any of the requirements cited in the second column, refer to the actual requirements cited.

The "Compliance Method" listed in the tables refers to permit conditions below the tables that include monitoring, recordkeeping and reporting obligations the permittee must conduct to comply with the permit. Following the monitoring method is an enforceable requirement of this permit.

The "Reference Test Method" listed in the requirements table is the test method to be used when a source test is required to determine compliance. In some cases where the applicable requirement does not cite a test method, one has been added. If a reference test method is not listed with the requirement, this means a test method is not applicable to the requirement. Reference Test

Methods included in the permit are listed in Section 7 of the permit and include the applicable averaging period.

Changes to the AOP during the Renewal Process:

A new table was added prior to Section 1 that gives a general description of the five emission units at the facility. The table is reproduced below and lists the emission units regulated under this permit located at Franz Weller. The information in the table is for informational purposes only.

Source	Description	Installation Date	Rated Capacity
Emission Unit No. 1 Direct Fired Baking Process	1) Natural Gas Fired Baker Perkins Tunnel Oven. (Currently Not in Use)	1969	5,037,000 Btu/Hour
	2) Natural Gas Fired Baker Perkins 38 Tray Oven.	1976	4,740,000 Btu/Hour
	3) Natural Gas Fired Clock Griddle.	2001	1,575,000 Btu/Hour
Emission Unit No. 2 Steam Generating Process and Direct-fired Ovens	1) Natural Gas Fired 200 Horsepower Kewanee Boiler, with diesel back-up.	1970	8,000,000 Btu/Hour.
	2) Natural Gas Fired 400 Horsepower Cleaver Brooks Boiler, with diesel back-up.	1976	16,000,000 Btu/Hour
	3) Space heaters (natural gas only).	2000	All below 10 MMBTUIHR Heat Input Rating
	4) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	5) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	6) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	7) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	8) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	9) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	10) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	11) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour
	12) Natural Gas Fired Revent Rack Oven.	2001	375,000 Btu/Hour

Source	Description	Installation Date	Rated Capacity
Emission Unit No. 3 Donut Fryer	Pillsbury/Moline 22-10S	NOC 3313 10/05/1989	Natural Gas
Emission Unit No. 4 Flour Storage and Transfer	1) One double flour silo with fabric vent bags (Silo 1-2)	1968-69	81,000 lbs each 162,000 lbs total
	2) Two flour storage silos each equipped with fabric breather bag on silo (Silos 3 & 4)	NOC 3261 07/25/1989	125,000 lbs each 250,000 lbs total
	3) Four flour use bins, with breather vent filters	1977-78	12,000 lbs each 48,000 lbs total
Emission Unit No. 5	Fifteen Natural Gas Fired Revent Rack Ovens	2020	380,000 Btu/Hour, each

The table includes the four emission units specified in the previous permit and adds EU-5, the Yeast-leavened Bread Products (Sour Dough Baking Line) permitted and installed in 2019.

Sections 1 and 2 are reformatted in the AOP renewal so that all facility-wide requirements and the corresponding compliance methods are in Section 1, and the emission unit specific requirements and corresponding compliance methods are in Section 2. The intent was to make it easier to connect the applicable requirement and the compliance method.

In the previous AOP, EU-1, EU-2, EU-3 and EU-4 had some repeated facility-wide requirements under emission unit specific requirements. Each of the emission unit specific requirements (Sections 2.A-2.D) have been updated as necessary to remove repeated facility-wide requirements.

The previous AOP predated the permitting and installation of EU-5, Yeast-leavened Bread Products (Sour Dough Baking Line). Section 2.E has been added to this renewal to include the applicable requirements for EU-5.

In the previous AOP, some of the applicable requirements listed the effective date, and others listed the adoption date. For consistency, the AOP has been updated to list the effective date for all applicable requirements.

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8.2 Compliance Methods

As noted above, compliance methods listed in the applicable requirements table are in permit conditions listed below the tables. The compliance methods include monitoring, recordkeeping and reporting obligations specific to the requirement that will be used by the permittee in determining if they are in continuous or intermittent compliance. In some cases where the applicable requirement has little or no ongoing monitoring requirements, monitoring has been added. This is called “gap-filling” and is authorized under WAC 173-401-615(1)(b).

9 General Facility-wide Emission Limits and Requirements

9.1 Common Stacks (Condition 1.1)

WAC 173-400-040(1)(b) establishes general requirements for emissions units that share a common stack.

Changes to the AOP during the Renewal Process: This general requirement has been added as Condition 1.1.

9.2 RACT Requirement (Condition 1.2)

PSCAA Regulation I, Section 3.04 establishes reasonably available control technology (RACT) requirements. There is no monitoring required. Condition 6.20 of the permit specifies that in accordance with WAC 173-401-605(3), emission standards and other requirements contained in rules or regulatory orders in effect at the time of this operating permit renewal shall be considered RACT for purposes of permit renewal.

Changes to the AOP during the Renewal Process: WAC 173-400-040(1)(c), General Standards for Maximum Emissions – General Requirements, was replaced by PSCAA Regulation I, Section 3.04, Reasonably Available Control Technology, in the 4/22/20 approval of the SIP. This condition has been updated to list PSCAA Regulation I, Section 3.04 as the enforceable requirement.

9.3 Opacity Standards (Condition 1.3)

PSCAA Regulation I, Section 9.03, Emission of Air Contaminant: Visual Standard, prohibits more than 20 percent opacity for more than three minutes in an hour and applies to all stationary sources. The compliance method is included in Condition 1.17 and requires monthly inspections for visible emissions from all emission points at the facility during each month that the facility operates. The source must take corrective action or use the reference test method, Ecology Method 9A, to determine opacity if any visible emissions are noted. Based on a review of the facility activities, including compliance evaluations, the basis for monthly monitoring is still valid and the permit renewal retains the same monitoring requirements.

Changes to the AOP during the Renewal Process: The monitoring method and frequency for the opacity monitoring have not changed, but the recordkeeping requirements have been included in the compliance method and language has been added to make it clear that failure to implement one of the response actions must be reported as a deviation.

The 9/20/93 version of WAC 173-400-040(1) was previously listed as an enforceable requirement for opacity standards. Changes to the state regulation caused WAC 173-400-040(1) to be renumbered as WAC 173-400-040(2). In the most recent SIP approved 4/22/2020, EPA has identified the 5/1/04 version of PSCAA Reg. I, Section 9.03 as applicable in the Agency's jurisdiction and replaces the WAC visual emission standard at 173-400-040(2). WAC 173-400-040(1) was removed from the list of enforceable requirements.

9.4 PM Standards (Conditions 1.4 and 1.5)

9.4.1 General Process Units

PSCAA Regulation I, Section 9.09, Particulate Matter Emission Standards, limits particulate emissions to 0.05 grain per dry standard cubic foot (gr/dscf) from equipment used in a manufacturing process. The monitoring method in the AOP is based on the assumption that particulate emissions less than 0.05 gr/dscf usually do not generally result in visible emissions over 20 percent opacity. Therefore, the permit requires the same monitoring method at the same frequency as the opacity requirements in Condition 1.2. The emission units that are general process units are unlikely to generate particulate matter emissions above this grain loading standard if operating as permitted.

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Changes in the AOP Renewal: The monitoring method and frequency still include the opacity monitoring from the previous permit, but an additional requirement was added, Condition 5.12 Investigations. This condition allows the Agency or the Department of Ecology to require a test to determine whether the emission units are complying with the standard.

In addition, the recordkeeping requirements have been included in the compliance method. Language has been added to make it clear that failure to implement any one of the response actions must be reported as a deviation.

WAC 173-400-060, Emission Standards for General Process Units, was replaced by PSCAA Regulation I, Section 9.09 in the 4/22/20 approval of the SIP, so WAC 173-400-060 has been removed as an enforceable requirement.

9.4.2 Combustion Sources

PSCAA Regulation I, Section 9.09, Particulate Matter Emission Standards, limits particulate emissions to 0.05 gr/dscf corrected to 7% oxygen from fuel burning equipment (i.e., equipment that produces hot air, hot water, steam, or other heated fluids by external combustion of fuel) combusting natural gas.

Aside from the 8 MMBtu/hr and 16 MMBtu/hr natural gas-fired boilers in EU-2, there are small (<10 MMBtu/hr) natural gas-fired space heaters and numerous ovens (<0.5 MMBtu/hr), which have very low particulate matter emissions when maintained and operated in good working order and should not have visible emissions. Therefore, the Agency has determined that the same compliance method as is used for particulate matter standards for general process units is adequate – monthly opacity monitoring.

Changes in the AOP Renewal:

The monitoring method and frequency have not changed, but the recordkeeping requirements have been included in the compliance method and language has been added to make it clear that failure to implement one of the response actions must be reported as a deviation.

WAC 173-400-050(1) and WAC 173-400-060 Emission Standards for Combustion and Incineration Units and Emission Standards for General Process Units, respectively, were replaced by PSCAA Regulation I, Section 9.09 in the 4/22/20 approval of the SIP, so WAC 173-400-050(1) has been removed as an enforceable requirement and WAC 173-400-060 is not an applicable requirement in the Agency's jurisdiction

9.5 Fugitive Emissions (Conditions 1.6 and 1.7)

PSCAA Regulation I, Section 9.15, Fugitive Dust Control Measures, and WAC 173-400-040(4)(a), General Standards for Maximum Emissions – Fugitive Dust, both require reasonable precautions to minimize or prevent fugitive emissions. PSCAA's rule also describes specific examples of reasonable precautions. Quarterly facility-wide inspections and complaint response are sufficient to monitor for changes that would cause fugitive emissions or unexpected buildup of dust.

Changes in the AOP Renewal: The monitoring method and frequency have not changed, but the language has been updated to reflect the updated format. For facility-wide inspections, Franz Weller is required to examine/inspect the same elements as is currently required although the previous AOP references prohibited activities under Section III and activities requiring additional approval under Section IV and those conditions are now described as the general applicable requirements at the facility to reflect the updated formatting of the AOP.

For both the facility-wide inspections and complaint response, recordkeeping requirements have been included in the compliance methods and language has been added to make it clear failure to implement one of the response actions must be reported as a deviation. Specifically, Condition 1.17 has also been updated to remove reference to Report of Problems Not Corrected Within 24 hours (previously in Section V.Q.4 of the prior AOP, removed in this renewal) and to clarify the options for either initiating corrective action or shutting down the unit/activity until repaired/corrected. Condition 1.17 updated language for categories of complaints from "fugitive

dust emissions" to "any emissions from fallout" and from "complaints regarding other applicable requirements" to "other emissions" for clarity.

The 9/20/93 version of WAC 173-400-040(8), General Standards for Maximum Emissions – Fugitive Dust Sources, was previously listed as an enforceable requirement for fugitive dust emissions standards. Changes to the state regulation caused WAC 173-400-040(8) to be renumbered as WAC 173-400-040(9). WAC 173-400-040(9)(a) was replaced by PSCAA Regulation I, Section 9.15 in the 4/22/20 approval of the SIP, so the 9/20/93 version of WAC 173-400-040(8) has been removed as an enforceable requirement.

9.6 Other Standards (Conditions 1.8 through 1.10)

PSCAA Regulation I, Section 9.11, Emission of Air Contaminant: Detriment to Person or Property, and WAC 173-400-040(5), General Standards for Maximum Emissions – Odors, are similar requirements that address emissions that may be environmentally detrimental or cause a nuisance. The monitoring method is based on responding to complaints and quarterly general inspections of the facility to identify any emissions that are likely to be injurious to human health, plant or animal life, or property, or that unreasonably interfere with enjoyment of life and property. Receiving complaints does not necessarily mean Franz Weller is in violation of this requirement, but Franz Weller has a responsibility to investigate complaints and take corrective action if necessary. PSCAA has not noted nor has PSCAA received complaints about Franz Weller causing emissions that are likely to be injurious to health, plant or animal life, or property or that unreasonably interferes with enjoyment of life and property. Franz Weller receives flour pneumatically from tanker trucks which is stored in silos included in EU-4 which, with maintenance of the flour handling systems, are not likely to result in fugitive dust emissions or fallout.

The Agency has determined that the as-needed complaint response and the quarterly facility-wide inspections required in Condition 1.18 of the permit are sufficient to monitor for changes that would cause nuisance emissions.

Changes in the AOP Renewal: The requirements in WAC 173-400-040(3), General Standards for Maximum Emissions – Fallout, is a state-only requirement and is not federally enforceable as it regulates emissions which EPA does not regulate. The rule specifies that Franz Weller shall not deposit particulate matter beyond the property boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of property have been included as a separate requirement. The monitoring method and frequency have not changed, but the language has been updated to reflect the updated format. For facility-wide inspections, Franz Weller is required to examine/inspect the same elements as is currently required although the previous AOP references prohibited activities under Section III and activities requiring additional approval under Section IV and those conditions are now described as the general applicable requirements at the facility to reflect the updated formatting of the AOP.

For both the facility-wide inspections and complaint response, recordkeeping requirements have been included in the compliance methods and language has been added to make it clear that failure to implement one of the response actions must be reported as a deviation. Specifically, Condition 1.19 has also been updated to remove reference to Report of Problems Not Corrected Within 24 hours (previously in Section V.Q.4 of the prior AOP, removed in this renewal) and to clarify the options for either initiating corrective action or shutting down the unit/activity until repaired/corrected. Condition 1.19 updated language for categories of complaints from "fugitive dust emissions" to "any emissions from fallout" and from "complaints regarding other applicable requirements" to "other emissions" for clarity.

The 9/20/93 version of WAC 173-400-040(5) was previously listed as an enforceable requirement for nuisance standards. Changes to the state regulation caused WAC 173-400-040(5) to be renumbered as WAC 173-400-040(6). WAC 173-400-040(6) was replaced by PSCAA Regulation I,

Section 9.11(a) in the 4/22/20 approval of the SIP, so the 9/20/93 version of WAC 173-400-040(5) has been removed as an enforceable requirement.

9.7 Maintain Equipment in Good Working Order (Condition 1.11)

PSCAA Regulation I, Section 9.20(b), Maintenance of Equipment, requires Franz Weller to maintain equipment or control equipment not subject to Section 9.20(a) in good working order. Section 9.20(a) applies to sources that received a Notice of Construction Order of Approval under PSCAA Regulation I, Article 6. Since it applies to specific emission units, Section 9.20(a) requirements are included in Section 2 of the permit.

Changes in the AOP Renewal: The monitoring method has been revised to refer to facility-wide monitoring and the facility O&M Plan requirements. The facility-wide inspections provide monitoring of the general effectiveness of Franz Weller's O&M Plan. This general monitoring and compliance with the O&M Plan provides sufficient monitoring criteria to certify that the equipment has been maintained in good working order. However, PSCAA reserves the right to evaluate the maintenance of each piece of equipment to determine if it has been maintained in good working order.

Since RCW 70.94.152(7) applies to equipment that received a Notice of Construction Order of Approval, references to this requirement were removed from Section 1 of the permit and added to Section 2 of the permit.

The specific requirements for the O&M Plan in the Agency's Regulation 1, section 7.09(b) have been explicitly included in the permit at EPA's request as new condition 1.23. This new condition was added to the compliance method for conditions 1.11 and 1.12.

9.8 O&M Plan (Condition 1.12)

In accordance with PSCAA Regulation I, Section 7.09(b), General Reporting Requirements for Operating Permits – Operation and Maintenance Plan, Franz Weller is required to develop and implement an O&M Plan to assure continuous compliance with PSCAA Regulations I, II, and III. The requirement specifies that the Plan shall reflect good industrial practice, but does not define how to determine good industrial practice. To clarify the requirement, PSCAA added that, in most instances, following the manufacturer's operations manual or equipment operational schedule, minimizing emissions until the repairs can be completed, and taking measures to prevent recurrence of the problem may be considered good industrial practice. This language is consistent with the Ecology requirement in WAC 173-400-101(4). PSCAA also added language establishing criteria for determining if good industrial practice is being used. These include, but are not limited to, monitoring results, opacity observations, review of operations and maintenance procedures, and inspections of the emission unit or equipment. PSCAA added this wording in response to Washington State court decision, Longview Fibre Co. v. DOE, 89 Wn. App. 627 (1998), which held that similar wording was not vague and gave sufficient notice of the prohibited conduct.

As described in Condition 5.5, Franz Weller must report to PSCAA all deviations, including any instances where it failed to promptly repair any defective equipment. In addition, Franz Weller has the right to claim certain problems were a result of an emergency (Condition 5.14) or unavoidable (Conditions 5.15 – 5.19).

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Changes in the AOP Renewal: The specific requirements for the O&M Plan in the Agency's Regulation 1, section 7.09(b) have been explicitly included in the permit at EPA's request as new condition 1.23. This new condition was added to the compliance method for conditions 1.11 and 1.12.

Following these requirements demonstrates that Franz Weller has properly implemented the O&M Plan, but it does not prohibit PSCAA or EPA from taking any necessary enforcement action to address violations of the underlying applicable requirements after proper investigation.

9.9 Other General Standards and Requirements (Conditions 1.13 – 1.16)

The following general standards and requirements apply to all current and future emissions units/activities at the facility. These requirements have been added into the facility-wide conditions to ensure that they are brought to the attention of the regulated source.

PSCAA Regulation I, Section 9.07, Sulfur Dioxide Emission Standard, limits sulfur dioxide emissions to 1,000 ppmvd (corrected to 7% oxygen for fuel burning equipment). This requirement has been added as Condition 1.13.

PSCAA Regulation I, Section 9.10(a), Hydrochloric Acid Emission Standard, limits hydrochloric acid emissions to 100 ppm (dry), 1-hour average corrected to 7% O_2 for combustion sources. This requirement has been added as Condition 1.14.

PSCAA Regulation I, Section 6.03, New Source Review, makes it unlawful for any person to cause or allow the establishment of a new source, or the replacement or substantial alteration of control equipment installed on an existing source, unless a "Notice of Construction application" has been filed and an "Order of Approval" has been issued by the Agency. This requirement has been added as Condition 1.15.

PSCAA Regulation I, Section 6.10, Work Done Without an Approval, states that: Where work for which an Order of Approval is required is commenced or performed prior to making application and receiving approval, the Control Officer may conduct an investigation as part of the Notice of Construction review. In such a case, an investigation fee, in addition to the fees of Section 6.04, shall be assessed in an amount equal to 3 times the fees of Section 6.04. Payment of the fees does not relieve any person from the requirement to comply with the regulations nor from any penalties for failure to comply. This requirement has been added as Condition 1.16.

9.10 Other Changes in the AOP Renewal

RCW 70.94.040 has been deleted from facility-wide applicable requirements. The provisions of RCW 70.94 RCW (now codified at RCW 70A.45), or the ordinances, resolutions, rules or regulations adopted thereunder are included in the permit as applicable requirements.

10 Emission Unit Specific Applicable Requirements

Section 2 contains requirements that apply to specific emission units at the facility.

10.1 Requirements that Apply to Emission Unit No. 1 (Direct Fired Baking Process)

Emission Unit No. 1 consists of the following equipment:

1) Natural Gas Fired Baker Perkins Tunnel Oven (Heat Input Rating = 5,037,000 Btu/Hour);
2) Natural Gas Fired Baker Perkins 38 Tray Oven (Heat Input Rating = 4,740,000 Btu/Hour); and
3) Natural Gas Fired Clock Griddle (Heat input Rating = 1,575,000 Btu/Hour).

The units comprising EU-1 have emission unit specific requirements outlined in Table 2 of this renewal.

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Changes in the AOP Renewal:

In the previous AOP, EU-1 repeated facility-wide requirements under emission unit specific requirements. In this renewal Section 2.A has been updated to remove repeated facility-wide requirements. The natural gas fired Baker Perkins Tunnel oven is currently out of service for the

foreseeable future. Much of the conveyor system for moving product through the baking process has been removed and repairs to the tunnel oven may be necessary. Depending on the extent of the repairs needed for proper operation, a Notice of Construction application and Order of Approval may be needed prior to returning the oven to service. EU-1 in the previous AOP also included a natural gas fired Baker Perkins 18 tray oven (Heat Input Rating = 2,280,000 Btu/Hour) which was removed from service and is not included in the renewed AOP.

The direct fired ovens comprising EU-1 fire natural gas only. Based on the amount of sulfur in natural gas fuel, it has been shown that combustion units that are fired on natural gas cannot exceed the 1,000 ppm SO_2 limits. Therefore, no additional monitoring is required for natural gas combustion in the ovens.

This renewal adds the previous compliance method (natural gas combustion) with Condition 5.12 Investigations and Testing. This condition allows the Agency or the Department of Ecology to investigate and require a test to determine whether the emission units are complying with the standard.

The 9/20/93 version of WAC 173-400-040(6), General Standards for Maximum Emissions – Sulfur Dioxide, was previously listed as an enforceable requirement for maximum emissions standards. Changes to the state regulation caused WAC 173-400-040(6) to be renumbered as WAC 173-400-040(7). WAC 173-400-040(7) was replaced by PSCAA Regulation I, Section 9.07 in the 4/22/20 approval of the SIP, so the 9/20/93 version of WAC 173-400-040(6) has been removed as an enforceable requirement and WAC 173-400-040(7) was not added.

PSCAA Regulation I, Section 9.10, Emission of Hydrochloric Acid, specifies that hydrochloric acid emissions shall not exceed 100 ppm (dry) corrected to 7% O_2 for combustion sources, including both internal and external combustion units. The direct fired ovens only burn natural gas which does not contain chlorine in sufficient quantities to cause the HCl emission limit to be exceeded.

The previous permit has had “No monitoring required” as the compliance method. This was changed and two compliance demonstrations were added: natural gas combustion and Condition 5.12 Investigations and Testing. This condition allows the Agency or the Department of Ecology to investigate and require a test to determine whether the emission units are complying with the standard.

10.2 Requirements that Apply to Emission Unit No. 2 (Steam Generating Process, Heaters and Ovens)

Emission Unit No. 2 consists of the following equipment:

1) Natural Gas Fired 200 Horsepower Kewanee Boiler (Heat Input Rating = 8,000,000 Btu/Hour), with diesel back-up.
2) Natural Gas and Diesel Fuel Fired 400 Horsepower Cleaver Brooks Boiler (Heat Input Rating = 16,000,000 Btu/Hour), with diesel back-up.
3) Space heaters all below 10 MMBTU/HR Heat Input Rating (natural gas only).
4) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
5) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
6) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
7) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
8) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
9) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
10) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
11) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).
12) Natural Gas Fired Revent Rack Oven (Heat Input Rating = 375,000 Btu/Hour).

The equipment comprising EU-2 has emission unit specific requirements outlined in Table 3 of this renewal.

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Changes in the AOP Renewal:

In the previous AOP, EU-2 repeated facility-wide requirements under emission unit specific requirements. In this renewal Section 2.B. has been updated to remove repeated facility-wide requirements.

The combustion units in EU-2 are subject to PSCAA Regulation I, Section 9.07, Sulfur Dioxide Emission Standard, which limits sulfur dioxide emissions to 1,000 ppmvd (corrected to 7% oxygen for fuel burning equipment), as shown in Facility-wide Condition 1.13.

The boilers in EU-2 primarily fire natural gas, but are capable of firing ultra-low sulfur diesel fuel as an emergency back up during very rare natural gas curtailments. The direct fired ovens comprising EU-2 fire natural gas only. Based on the amount of sulfur in natural gas and diesel fuel, it has been shown that combustion units that are fired on natural gas or ultra-low sulfur diesel fuel cannot exceed the 1,000 ppm SO_2 limits. Therefore, no additional monitoring is required for natural gas fuel combustion. However, the permittee shall maintain vendor delivery receipts showing that all diesel fuel purchased for back-up use in the boilers qualifies as ultra-low sulfur diesel (i.e., less than 0,0015% sulfur).

This renewal adds Condition 5.12 Investigations and Testing. This condition allows the Agency or the Department of Ecology to investigate and require a test to determine whether the emission units are complying with the standard.

The 9/20/93 version of WAC 173-400-040(6), General Standards for Maximum Emissions – Sulfur Dioxide, was previously listed as an enforceable requirement for maximum emissions standards. Changes to the state regulation caused WAC 173-400-040(6) to be renumbered as WAC 173-400-040(7). WAC 173-400-040(7) was replaced by PSCAA Regulation I, Section 9.07 in the 4/22/20 approval of the SIP, so the 9/20/93 version of WAC 173-400-040(6) has been removed as an enforceable requirement and WAC 173-400-040(7) was not added.

PSCAA Regulation I, Section 9.10, Emission of Hydrochloric Acid, specifies that hydrochloric acid emissions shall not exceed 100 ppm (dry) corrected to 7% O_2 for combustion sources, including both internal and external combustion units, as shown in Facility-wide Condition 1.14. The fuel fired in the steam generating units and direct fired ovens does not contain chlorine in sufficient quantities to cause the HCl emission limit to be exceeded.

The previous permit has had “No monitoring required” as the compliance method. This was changed and two compliance demonstrations were added: natural gas and ultra-low sulfur fuel combustion and Condition 5.12 Investigations and Testing. This condition allows the Agency or the Department of Ecology to investigate and require a test to determine whether the emission units are complying with the standard.

10.3 Requirements that Apply to Emission Unit No. 3 (Donut Fryer)

Emission unit No. 3 consists of one donut production system with Pillsbury/Moline 22-10S Automatic Continuous Proofer (9-compartment), Automatic Fryer (1,385 dozen/hr) with two Maxon gas burners and a "V" grease filter bank.

The equipment comprising EU-3 has emission unit specific requirements for operation and maintenance outlined in Table 4 of this renewal.

Changes in the AOP Renewal:

The donut fryer was originally permitted under Puget Sound Clean Air Agency Order of Approval

No. 3313, which imposed a unit-specific opacity standard of 20%, but did not specify any frequency of testing. In the previous AOP, gap filling was imposed to require quarterly inspections of the donut fryer and take corrective action if any opacity (other than water vapor) was evident. The condition required the permittee to:

Take corrective action until there are no visible emissions, or

Record the opacity using Washington Department of Ecology Method 9A, or

Shut down the unit or activity until it can be repaired.

In response to this condition, the Permittee has been performing quarterly Method 9A opacity tests for at least the previous 10 years. Although not the intent of the previous permit writer, the data collected is more than sufficient to show that the donut fryer regularly operates well under the permit limit of 20% opacity. Most of the quarterly opacity tests have shown that the donut fryer stack typically emits between 6 and 8% opacity, with 15% having been recorded only twice. Based on this historical data, the Agency has reasonable assurance that the donut fryer will continue to operate well under the permit limit of 20% opacity, negating the perceived need to continue performing quarterly Method 9A opacity tests.

Therefore, the Agency is utilizing its gap-filling authority under WAC 173-401-615(1)(b) to require a regular annual opacity test to demonstrate compliance with the permitted opacity limit. In addition, monthly inspections are required to verify proper operation and maintenance of the donut fryer equipment. These gap-filling requirements are contained in new Conditions 2.17 and 2.18.

10.4 Requirements that Apply to Emission Unit No. 4 (Flour Storage and Transfer)

The two 125,000 lb capacity and the one 162,000 lbs capacity indoor silos with fabric bin vent filter bags, the four indoor flour use bins of 9,056 lbs capacity, and the pneumatic conveying blowers which transfer the flour to the use bins comprising EU-4 have emission unit specific requirements listed in Table 5.

Changes in the AOP Renewal:

This renewal updated the description of EU-3 to include silo capacity details as well as the flour use bins and the conveying blowers for the flour storage and transfer.

The fabric filter inspections are now more clearly organized as an emission unit specific compliance method.

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10.5 Requirements that Apply to Emission Unit No. 5 (Yeast-leavened Bread Products (Sour Dough Baking Line)).

The 15, Revent 620G, 0.375 MMBtu/hr natural gas-fired ovens for baking yeast-leavened bread products, with a capacity of baking a maximum of 121,392 pounds of product per day, controlled by one CSM Model 45A natural gas-fired catalytic oxidizer permitted and installed in 2019 have been added as a new emissions unit (No. 5) for this renewal. The ongoing enforceable requirements of Order of Approval No. 11674 were added to Table 6 of this renewal followed by the associated compliance methods.

Changes in the AOP Renewal:

- As discussed in Section 8 of this Statement of Basis, a condition was added for each emission unit that has an active Order of Approval to include Condition 1 from each of the Orders.
- Order of Approval 11674 contains BACT requirements that all exhaust from the 15 Revent ovens be routed through an RCO meeting a minimum VOC destruction efficiency of 95% and zero visible emissions from the oxidizer stack. The compliance methods for the specific VOC

and visible emission limits and overarching requirement that the oven emissions be controlled by the RCO are required in Order of Approval 11674 as a combination of testing for VOC destruction efficiency once every five years, annual catalyst activity testing, cleaning or replacement of the catalyst when indicated by manufacturer or results of catalyst activity testing, quarterly visible emission observations of the oxidizer stack and maintaining minimum RCO inlet and outlet temperatures during operation with associated records. Since the 2019 installation of the RCO, stack testing completed February 19, 2020, indicated compliance with the 95% destruction efficiency testing, annual catalyst activity testing has identified required cleaning and no visible emissions have been observed during quarterly observations. The facility uses a strip chart and an electronic data recorder to record minimum inlet and outlet temperature for the RCO. Based on the overall performance of the RCO, PSCAA has determined that the compliance methods identified in NOC 11674 and reproduced in this renewal as RCO Visible Emissions Observations (Requirement 2.29), VOC Source Testing (Requirement 2.30), and RCO Monitoring (Requirements 2.31 – 2.35) are sufficient. Conditions from NOC 11674 are reproduced in Table 6, Applicable Requirements Related to Yeast-leavened Bread Products or in Compliance Methods 2.29 - 2.39. with the following exceptions:

- Order of Approval 11674 Condition 7 requires that the recuperative oxidizer maintain a minimum VOC destruction efficiency of 95%. This requirement was added to Table 6. The compliance methods include VOC source testing as required in Order of Approval 11674 Conditions 8 and 9 which is Requirement 2.30 in this renewal. Order of Approval 11674 Condition 8 outlines initial testing requirements and deadlines, as well as ongoing testing requirements in Condition 9. As initial testing was completed February 19, 2020, the content of Condition 8 pertaining to initial testing is not included in this renewal.
- Order of Approval 11674 Condition 9 specifies testing be conducted according to PSCAA Regulation I Section 3.07. The requirements of PSCAA Regulation I 3.07 are reproduced in the General Compliance Requirements of Requirements 5.30-5.32 of this renewal and Requirements 5.30-5.32 are referenced in Requirement 2.30 of this renewal.
- Order of Approval 11674 included specific requirements for a test plan to be submitted associated with initial testing of the 15 Revent ovens' RCO. PSCAA has utilized gap filling to require test plans be submitted for ongoing testing as outlined in Condition 2.30 of this renewal following the same procedures as were completed for the initial test.
- Order of Approval 11674 Condition 12 requires that annual catalyst activity testing be completed and that the results of the test must be submitted to PSCAA. As Order of Approval 11674 Condition 12 does not include a timeline for reporting activity testing results or specify how to submit the reports, when this condition was adapted to Requirement 2.32 in this renewal, a 30-day due date for submittal of the catalyst activity test data and a reference to the general compliance reporting requirement in Section 5.9 was added as gap-filling authorized under WAC 173-401-615(1)(b). Given the catalyst activity data is typically provided in an electronic format to Franz Weller, Requirement 2.32 notes that hard copies of the catalyst activity data are not required for these compliance reports.
- Order of Approval 11674 Condition 2.31 specifies that the owner or operator shall maintain a temperature measuring and recording system to continuously measure and record the temperatures at the inlet and outlet of the catalyst bed pursuant to the operation and maintenance requirements specified in 40 CFR 64.7. EU-4 does not meet the three criteria of 40 CFR 64.2(a) for Compliance Assurance Monitoring, as discussed in Section 7.1.2, however the operation and maintenance requirements of 64.7(b) and 64.7(c) are included as part of the BACT requirements from minor NSR permitting under

PSCAA Regulation I 6.03 such that this renewal contains Requirement 2.31 as a compliance method for the minimum temperature requirement of Requirement 2.27.

PSCAA Regulation I, Section 9.07, Sulfur Dioxide Emission Standard, limits sulfur dioxide emissions to 1,000 ppmvd (corrected to 7% oxygen for fuel burning equipment).

The 15 Revent ovens and RCO of EU-5 fire natural gas only. Based on the amount of sulfur in natural gas fuel, it has been shown that combustion units that are fired on natural gas cannot exceed the 1,000 ppm SO_2 limits. Therefore, no additional monitoring is required for natural gas combustion.

This renewal adds the previous compliance method (natural gas combustion) with Condition 5.12 Investigations and Testing. This condition allows the Agency or the Department of Ecology to investigate and require a test to determine whether the emission units are complying with the standard.

The 9/20/93 version of WAC 173-400-040(6), General Standards for Maximum Emissions – Sulfur Dioxide, was previously listed as an enforceable requirement for maximum emissions standards. Changes to the state regulation caused WAC 173-400-040(6) to be renumbered as WAC 173-400-040(7). WAC 173-400-040(7) was replaced by PSCAA Regulation I, Section 9.07 in the 4/22/20 approval of the SIP, so the 9/20/93 version of WAC 173-400-040(6) has been removed as an enforceable requirement and WAC 173-400-040(7) was not added.

PSCAA Regulation I, Section 9.10, Emission of Hydrochloric Acid, specifies that hydrochloric acid emissions shall not exceed 100 ppm (dry) corrected to 7% O_2 for combustion sources, including both internal and external combustion units. The 15 Revent ovens and RCO only burn natural gas which does not contain chlorine in sufficient quantities to cause the HCl emission limit to be exceeded.

The previous permit has had “No monitoring required” as the compliance method. This was changed and two compliance demonstrations were added: natural gas combustion and Condition 5.12 Investigations and Testing. This condition allows the Agency or the Department of Ecology to investigate and require a test to determine whether the emission units are complying with the standard.

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11 Standard Terms and Conditions

Some of the requirements that are more general in nature are included in Section 3, Standard Terms and Conditions. This section also contains the standard terms and conditions specifically listed in WAC 173-401-620. These terms have been updated to reflect the most recent rules and permit language.

Changes in the AOP Renewal:

The previous AOP organized the requirements under Standard Terms and Conditions in Section V Standard Terms and Conditions. These terms are now located in Section 3 of the renewal.

12 General Permitting Requirements

Section 4 of the permit includes the requirements for renewing, revoking, reopening, amending, and modifying the operating permit. It also includes the new source review requirements, both minor NSR and Prevention of Significant Deterioration requirements. This section has been edited to more accurately reflect the Air Operating Permit regulations.

Changes in the AOP Renewal:

The previous AOP set a timeline for submittal of a renewal application no later than 12 months prior to the expiration of the AOP and included that PSCAA would send a renewal application no later than 18

months prior to the expiration of the permit. The updated Permit Renewal Condition 4.1 requires that the permittee submit a complete Title V permit renewal application to PSCAA no less than six months prior to the expiration of the permit. This update was made to reflect the minimum timeline for renewal application submittal in WAC 173-401-500(3)(d) and WAC 173-401-710. The WAC 173-401-710 requirement that the permitting authority send a permit application to each source at least six months before a complete application is due applies to PSCAA and not to Franz Weller and has been removed from the AOP.

The previous AOP outlined the procedure for processing an administrative amendment. As these requirements apply to PSCAA and not to Franz Weller, the procedure has been removed from this renewal.

This renewal updated the requirements for New Source Review under PSCAA Regulation I Section 6 to include the New Source Notification requirements of PSCAA Regulation I Section 6.03(b) as well as the Notice of Completion requirements under PSCAA Regulation I Section 6.09, as these applicable requirements were omitted in the previous AOP.

This renewal added the requirements to comply with the Prevention of Significant Deterioration (PSD) program as this applicable requirement was omitted in the previous AOP.

Several requirements located in Section V of the previous permit have been moved to Section 4 in this renewal given that the requirements relate specifically to permitting.

13 General Compliance Requirements

General compliance requirements are included in Section 5 of the permit. These include certification and reporting requirements, requirements associated with inspections and investigations, and compliance testing requirements. Actions required for an affirmative defense for emergencies or excess emissions are also included in this section. Finally, this section provides a table summarizing the effective date of the regulations in the permit at the time of permit issuance. Regulations that are approved into the Washington State Implementation Plan (SIP) are federally enforceable. In some cases, there are two versions of the regulation because the newer version has not been adopted into the SIP. In this case, the older version of the regulation would be federally enforceable and the current rule would only be enforceable by the Agency (or State). The SIP is updated on a somewhat regular basis and what is contained in the SIP can change over time.

Changes in the AOP Renewal:

Data recovery requirements were previously listed in Section V.P of the AOP and are now listed in Condition 5.10. In the previous AOP there were four types of monthly monitoring which were excepted from the 100% data recovery requirement: monitoring of opacity, fallout and odor bearing contaminant monitoring, baking process and steam generating units, and fabric filter inspections, all of which were allowed to have 9 out of 10 records required. In this renewal these exceptions are removed as the frequency for the facility-wide inspections allows for corrections to missed monitoring to occur within a month-long window. Language was also added to clarify that data do not need to be collected during any period that the monitored equipment does not operate. In addition, language was added requiring that the deviation reports required by Condition 5.5 include an explanation of each instance in which the permittee failed to meet the data recovery requirements of this condition for any monitored process or parameter and any instances of reconstructing lost data.

Requirement 5.3 Compliance Certification, Requirement 5.4 Semiannual Report, and Requirement 5.5 Deviation Report were each updated from the previous AOP to include the email address for submission of annual compliance certifications electronically. Likewise Requirement 5.9 was added to include the email address for electronic submittal of all other compliance reports.

Condition 5.33 Federal Enforceability was updated to reflect the newest approval of the Agency's State Implementation Plan. Additional language was added to the introductory paragraph for clarity and completeness.

The previous AOP included a table with a summary of reporting requirements. This table repeated the applicable requirements already in the AOP and has been removed from this renewal.

14 Generally Applicable Requirements

Some of the requirements that are generally applicable are included in Section 6 of the permit. This includes record retention, asbestos requirements, open burning requirements, stratospheric ozone and climate protection requirements, chemical accident prevention provisions in 40 CFR Part 68, concealment and masking, tampering, RACT requirements, annual emission reporting requirements, greenhouse gas reporting requirements and non-road engine notification requirements.

15 Test Methods and Averaging Periods

The test methods and averaging times listed in Section 7 of the air operating permit are general in nature and are to be used if no other methods are specifically listed at a given requirement.

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16 Inapplicable Requirements

The requirements identified in Section 8 of the air operating permit do not apply to the facility, or to the specific emissions units identified in the permit. The permit shield applies to all requirements so identified.

Changes in the AOP Renewal:

The previous permit cited WAC 173-470, WAC 173-474, WAC 173-475, WAC 173-480 and WAC 173-481 as inapplicable requirements. WAC 173-470, WAC 173-474, and WAC 173-475 are no longer active regulations and have been removed from the Inapplicable Requirements table in this renewal. WAC 173-476 Ambient Air Quality Standards have replaced the inactive WAC references for ambient air quality standards. WAC 173-480 and WAC 173-481 are still included in the Inapplicable Requirements Table.

17 Insignificant Emission Units and Activities

Section 9 of the permit addresses insignificant emission units and activities. In accordance with WAC 173-401-530(1), determination of an emission unit or activity as insignificant does not exempt the unit or activity from any applicable requirement.

An emission unit or activity is insignificant based on one or more of the criteria identified in WAC 173-401-530. This includes categorical exemption, exemption based on emissions being below emission thresholds in WAC 173-401-530(4), or exemption based on size or production rate. Activities that generate only fugitive emissions which are subject to no applicable requirement other than generally applicable requirements can also be classified as insignificant. Categorically exempt units or activities do not need to be listed in the permit application, but all others do.

Monitoring requirements for insignificant emission units are detailed in Condition 1.22 of the permit. In essence, Franz Weller will be required to use good industrial practices to maintain insignificant emission units, and to promptly repair defective equipment or shut down the unit until defective equipment can be repaired. Franz Weller will not have to keep records of maintenance of insignificant emission units except when such equipment is inspected and a problem requiring prompt repair is discovered during a quarterly plant-wide inspection.

18 Public Comments and Responses During Renewal Process

There were no comments from the public or from the applicant during the public comment period. No changes were made to the Draft permit when preparing the Proposed permit for EPA review.

19 EPA Comment Period

The Proposed permit was issued for EPA's 45-day review on September 11, 2023. No comments were received regarding this permit renewal. The Final AOP renewal permit was prepared for issuance on October 31, 2023, and will be in effect until expiration on October 31, 2028.

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