

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

December 3, 2018

**PERMIT TO INSTALL
131-18**

ISSUED TO
Roskam Baking Company – S1 & S2 Facilities

LOCATED AT
5353 and 5565 Broadmoor Avenue SE
Kentwood, Michigan

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
P0117

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: October 10, 2018	
DATE PERMIT TO INSTALL APPROVED: December 3, 2018	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	Less than 89.9 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC II.2, SC V.3, SC VI.3, SC VI.4, SC VI.7	R 336.1205(3)
2. NO _x	Less than 89.9 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC II.1 SC III.1 SC VI.2, SC VI.6	R 336.1205(3)
3. Each Individual HAP	Less than 8.9 tpy**	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC V.3, SC VI.5, SC VI.8	R 336.1205(3)
4. Aggregate HAPs	Less than 22.4 tpy**	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC V.3, SC VI.5, SC VI.8	R 336.1205(3)

* To establish the source-wide potential to emit for FGFACILITY, emissions from all existing equipment in FGFACILITY were included in the calculations. The potential emissions from all exempt external combustion units were calculated using the fuel restrictions in FGFACILITY. For all emergency internal combustion engines, the potential emissions of NO_x were calculated based on the hours of operation limit in FGFACILITY. For all external combustion sources, the potential emissions were calculated based on the fuel limit in FGFACILITY. For the yeast raised baked bread line, the potential emissions of VOCs were calculated based on the production limit in FGFACILITY. For all other production lines, the potential emissions of VOC were calculated based on each line operating at its maximum production rate per year.

** Beginning on the date of the issuance of the permit, and continuing for the first 12 calendar months, this limit applies to the cumulative total HAP emissions. Thereafter, the limit shall become a 12-month rolling limit.

II. MATERIAL LIMITS

1. The permittee shall not utilize more than 1,739.5 million cubic feet of pipeline quality natural gas per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205(3))**
2. The permittee shall not bake more than 145,919,936 pounds of yeast raised baked bread product per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205(3))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate for more than 300 hours per 12-month rolling time period (combined) as determined at the end of each calendar month for all engines in FGFACILITY. **(R 336.1205(3))**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**
2. The permittee shall determine the VOC content, water content, and density of any material, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1205(3))**
3. Within 180 days of the issuance of the permit, the permittee shall verify VOC and HAPs emission rates from the yeast raised baked bread line located at the facility by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1205(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**
2. The permittee shall monitor and record, in a satisfactory manner, the hours of operation for all engines on a monthly basis and 12 month rolling time period, as determined at the end of each calendar month in FGFACILITY. **(R 336.1205(3))**
3. The permittee shall monitor and record, in a satisfactory manner, the amount of yeast raised baked bread product, in pounds, each month and 12 month rolling time period, as determined at the end of each calendar month in FGFACILITY. **(R 336.1205(3))**

4. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Volume or weight of each VOC containing material used.
 - b) Where applicable, volume or weight of each VOC containing material reclaimed.
 - c) VOC content, in pounds per gallon, pounds per pound, or other units as appropriate, of each VOC containing material used.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

5. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Volume or weight of each HAP containing material used.
 - b) Where applicable, volume or weight of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon, pounds per pound, or other units as appropriate, of each HAP containing material used.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

6. The permittee shall keep monthly records for FGFACILITY of NO_x emission calculations determining the monthly emission rate in tons per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**
7. The permittee shall keep monthly records for FGFACILITY of VOC emission calculations determining the monthly emission rate in tons per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**
8. The permittee shall keep records of individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per calendar month and per 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart IIII for Stationary Compression Ignition Internal Combustion Engines by the initial compliance date. **(40 CFR Part 60, Subparts A and IIII)**
2. The permittee shall comply with all applicable provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart Dc for Small Industrial-Commercial-Institutional Steam Generating Units by the initial compliance date. **(40 CFR Part 60, Subparts A and Dc)**

3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ for Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR Part 63, Subpart ZZZZ)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).