Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745

Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1146-15-F Plant ID: 1146

Effective Date: xx/xx/2015 Expiration Date: xx/xx/2020

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Preferred Marketing Solutions
2001 Papa John's Blvd.
Louisville, Kentucky 40299

P.J. Food Services, Inc.
2002 Papa John's Blvd.
Louisville, Kentucky 40299

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	Total HAP	Single HAP
Tons/year:	<25 tpy	<12.5 tpy	<5 tpy

Permit Writer: Shannon Hosey

Date of Public Notice: 08/18/2015

{Manager1}
Air Pollution Control Officer
{date1}

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FEDOOP Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	197-0-F	11/05/2001	07/01/2001	Initial	Entire Permit	Initial Permit Issuance
R1	197-0-F (R1)	12/21/2003	12/21/2003	Revision	Entire Permit	Incorporation of construction permit 340-02-C
N/A	O-1146-15-F		08/18/2015	Renewal	Entire Permit	Scheduled permit renewal; Incorporation of construction permits 34-06-C, 35-06-C and 137-10-C

FEDOOP Permit Applications

Application #	Date Rec'd	Type
72411	07/10/2015	FEDOOP STAR Exempt Application
16719	01/06/2011	Responsible Official Change
72673	10/01/2008	Insignificant Activity List
72557	2/03/2006	Application for Construction Permit 34-06-C and 35-06-C
72558	6/26/2006	Application for Copier
72559	8/31/2006	Application for FEDOOP Renewal
72560	04/24/1998	Application for PJ Foods PM Equipment

Abbreviations and Acronyms

AP-42 - AP-42, *Compilation of Air Pollutant Emission Factors, published by U.S.EPA*
APCD - Louisville Metro Air Pollution Control District
BAC - Benchmark Ambient Concentration
BACT - Best Available Control Technology
Btu - British thermal unit
CEMS - Continuous Emission Monitoring System
CFR - Code of Federal Regulations
CO - Carbon monoxide
District - Louisville Metro Air Pollution Control District
EA - Environmental Acceptability
gal - U.S. fluid gallons
GHG - Greenhouse Gas
HAP - Hazardous Air Pollutant
HCl - Hydrogen chloride
Hg - Mercury
hr - Hour
in. - Inches
lbs - Pounds
l - Liter
LMAPCD - Louisville Metro Air Pollution Control District
mmHg - Millimeters of mercury column height
MM - Million
NAICS - North American Industry Classification System
NO_x - Nitrogen oxides
PM - Particulate Matter
PM_{10} - Particulate Matter less than 10 microns
$PM_{2.5}$ - Particulate Matter less than 2.5 microns
ppm - parts per million
PSD - Prevention of Significant Deterioration
psia - Pounds per square inch absolute
QA - Quality Assurance
RACT - Reasonably Available Control Technology
SIC - Standard Industrial Classification
SIP - State Implementation Plan
SO_2 - Sulfur dioxide
STAR - Strategic Toxic Air Reduction
TAC - Toxic Air Contaminant
UTM - Universal Transverse Mercator
VOC - Volatile Organic Compound
w.c. - Water column
year - Any period of twelve consecutive months, unless "calendar year" is specified
yr - Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.

2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.

3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.

5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.

6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.

8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.

9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as

the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM_{10}, $PM_{2.5}$, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO_2-equivalent, as defined in 40 CFR 98. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.

12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the following per Regulation 2.17, section 3.5.

    - A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
    - The signature and title of a responsible official of the company.

    The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures

Regulation	Title
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745

Emission Unit U1: Printing Operation

U1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.17	Federally Enforceable District Origin Operating Permits	All
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 3

U1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID
E1	One (1) Heidelberg 6-color Offset Lithographic Sheet-fed Press	7.25	NA
E2	One (1) 36" Heatset Web Press, make King Press, with dryer		C1
E3	One (1) Goss International 38" Heatset Web Lithography Printing Press, model Sunday 2000, 1854 fpm		C2

U1 Control Devices:

Control ID	Description	Pollutant Controlled
C1	One (1) Catalytic Oxidizer, make Meg-Tec, model Quantum 020-070	VOC
C2	One (1) Eco-Cool Thermal Oxidizer, model TL 120-1200, 3000 scfm	

U1 Specific Conditions

S1. **Standards** (Regulation 2.17, section 5.1)

a. **VOC**

i. For Emission Point E1, the owner or operator shall not allow or cause the VOC emissions to exceed 5 tons during any consecutive 12-month period. (Regulation 7.25, section 3) (BACT) (Permit 340-02-C, effective 12/06/2002)

ii. For Emission Point E2, the owner or operator shall not allow or the cause the VOC emissions to exceed 10 tons during any consecutive 12-month period. (Regulation 7.25, section 3) (BACT) (Permit 177-00-C, effective 6/30/2000)

iii. For Emission Point E3, the owner or operator shall not allow or the cause the VOC emissions to exceed 17 tons during any consecutive 12-month period. (Regulation 7.25, section 3) (BACT) (Permit 34-06-C, effective 6/30/2007)

iv. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period[1]. (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1)

v. The owner or operator shall operate and maintain control device (C1) catalytic oxidizer at all times (E2) heatset web press is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards.

vi. The owner or operator shall operate and maintain control device (C2) thermal oxidizer at all times (E3) heatset web lithography press is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards.

vii. The thermal oxidizer (C2) shall achieve a minimum VOC destruction efficiency of 98%. The combustion chamber temperature shall be maintained at 1400°F or greater at all times the heatset web lithography press (E3) is in operation, unless otherwise established by subsequent stack test. The thermal oxidizer shall have a minimum residence time of 0.5 seconds. (Regulation 2.17, section 5.1)

[1] On 06/26/15, the source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

viii. The owner or operator shall operate and maintain the temperature to the inlet site of the catalyst bed (C1) at 650°C or greater, unless otherwise established by subsequent stack test. (Regulation 2.17, section 5.1)

ix. The District has determined that compliance with the following VOC requirements represent Best Available Control Technology (BACT).[2]

Table 1

Raw Material	BACT Limit
(Sheet Fed Presses) Conventional Inks [3]	18% by weight VOC
(Sheet Fed Presses) Specialty Inks (including, but are not limited to, metallic, magnetic, fluorescent, and iridescent inks)	25% by weight VOC 10% of total ink usage
(Heat Set Presses) Inks	45% by weight VOC
(Sheet Fed Presses) Fountain Solution	Non-Vinyl: 5% by weight VOC as applied; or 8.5% by weight if Chilled Fountain Solution at 60°F max.; Vinyl or Plastic Sheets: 10% by weight as applied
(Heat Set Presses) Fountain Solution	1.6% by weight, if the fountain solution contains alcohol and is not chilled 3.0 % by weight, if the fountain solution contains alcohol and is chilled to 60°F or 5.0% by weight, if the fountain solution contains no alcohol and is not chilled, or 6.0% by weight, if the fountain solution contains no alcohol and is chilled to 60°F
(Sheet Fed and Heat Set Presses) Blanket Wash	70% by weight VOC as applied or vapor pressure ≤ 10 mm Hg at 68°F
(Sheet Fed and Heat Set Presses) Roller Wash	70% by weight VOC as applied or vapor pressure ≤ 10 mm Hg at 68°F
(Sheet Fed and Heat Set Presses) Water-based Coatings (Aqueous)	1.0 lb VOC/gal as applied

(Regulation 2.03, section 5.1) (Regulation 7.25, section 3) (BACT)

[2] The District has determined that the use of raw materials that comply with the emission standards in Specific Condition S1.a.viii. represents BACT level of control for the lithographic presses.

[3] Per EPA guidance document for Lithographic Printing and Letterpress Printing dated September 2006, the document defines varnishes as un-pigmented offset lithography inks, and therefore are to be included in the conventional ink category.

x. If the fountain solution VOC content is greater than 5% by weight as applied, then the owner or operator shall maintain the temperature at or below 60°F for each fountain solution reservoir. (Regulation 7.25, section 3) (BACT)

xi. The owner or operator shall use the least amount of VOC containing materials needed for the job. (Regulation 7.25, section 3) (BACT)

xii. The owner or operator shall store all VOC containing materials in closed containers when not in use. This includes materials such as inks, solvents, fountain solution, press cleaning materials, and waste materials including rags/wipes/paper used to clean press components. (Regulation 7.25, section 3) (BACT)

xiii. The owner or operator shall clean up all spills of any VOC containing materials no matter how small it is. If the spill is significant (i.e. more than one gallon), the owner or operator shall notify maintenance or professionals for assistance. (Regulation 7.25, section 3) (BACT)

b. **HAP**

i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period[4]. (Regulation 5.00, section 1.13.5.2)

ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period[4]. (Regulation 5.00, section 1.13.5.3)

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

i. The owner or operator shall monitor and maintain records of the name, quantity used, and VOC content for each of the following raw materials: inks, fountain solution concentrate, fountain solution additive, blanket wash, roller wash, press cleaning materials, and any other VOC containing material used during each calendar month and consecutive 12-month period.

[4] On 06/26/15, the source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

ii. To demonstrate compliance with Specific Condition S1.a.viii., the owner or operator shall maintain monthly records that show the quantity (in pounds) of specialty inks used during each calendar month and calculate the percentage of the total inks used that are classified as specialty inks as determined on a consecutive 12-month basis.

iii. The owner or operator shall maintain monthly records, including calculations, which show during each calendar month and consecutive 12-month period VOC emissions from:

1) Emission Point E1,
2) Emission Point E2,
3) Emission Point E3, and
4) Plant-wide Emission Points.

iv. The owner or operator of a lithographic press using automatic cleaning equipment (e.g. blanket washers) that mixes the cleaning solution at the point of application and who must demonstrate the cleaning solution (as applied) complies with Specific Condition S1.a.viii. shall:

1) Operate, maintain, and calibrate the automatic feed equipment to regulate the volume of each cleaning solvent and water (or other non-VOC), as mixed; and

2) Preset the automatic feed equipment so that the consumption rates of the cleaning solvents and water (or other non-VOC), as-applied, comply with Specific Condition S1.a.viii.

v. For each batch of blanket wash, roller wash, or other cleaning solution not prepared with automatic equipment, the VOC content of the cleaning solution (as applied) shall be determined by calculation. The calculation shall be kept in a batch log. The owner or operator shall document any additions of VOC or deviation from the standard cleaning solution makeup including the date and time of occurrence.

vi. To demonstrate compliance with the fountain solution temperature requirements in Specific Condition S1.a.ix. the owner or operator shall use a thermometer or other temperature detection device capable of reading to within 2.0 degrees to measure and record the temperature of each fountain solution reservoir once per day for each operating day and keep daily records of the temperature.

vii. The VOC emissions from the litho presses can be calculated according to the following methodology or another approved in writing by the District:

Off-set Lithography Sheet-fed Presses

E_{VOC} = $[(I_{VOC})(I_{Ret}) + (FS_{VOC}) + (BW_{VOC}) + (RW_{VOC}) + (C_{VOC}) + ((CS_{VOC})(R)]$

E_{VOC} = lb VOC Emissions

I_{VOC} = lb of sheet-fed ink used × weight % VOC in each ink

I_{Ret} = 0.050 (1 - Ink oil retention factor of 0.95 for non-heatset inks)

FS_{VOC} = Qty of fountain solution used (gallons) × VOC content of fountain solution as applied (lb/gal)

BW_{VOC} = Qty of blanket wash used (gallons) × VOC content of blanket wash as applied (lb/gal)

RW_{VOC} = Qty of roller wash used (gallons) × VOC content of roller wash as applied (lb/gal)

C_{VOC} = Qty of coatings used (gallons) × VOC content of coating as applied (lb/gal)

CS_{VOC} = Qty of each cleanup solvent used (gallons) × VOC content as applied (lb/gal)

Off-set Lithography Heatset Presses

E_{VOC} = $[(I_{VOC})(I_{Ret})(C_{HI}) + (FS_{VOC})(C_{FS}) + (BW_{VOC})(C_{BW})](1\text{-}CE) + [(0.05)(I_{VOC})(I_{Ret})] + [(0.30)(FS_{VOC})] + [(0.60)(BW_{VOC})] + Et_{VOC} + [(RC_{VOC})(R)]$

E_{VOC} = lb VOC Emissions

I_{VOC} = lb of heatset ink used × weight % VOC in each ink

I_{Ret} = 0.80 (1 - Ink oil retention factor of 0.20 for heatset inks)

C_{HI} = 0.95 (Capture Efficiency for heatset inks)

FS_{VOC} = Qty of fountain solution used (gallons) × VOC content of fountain solution as applied (lb/gal)

C_{FS} = 0.70 (Capture Efficiency for fountain solution using alcohol substitutes)

BW_{VOC} = Qty of blanket wash used (gallons) × VOC content of blanket wash as applied (lb/gal)

C_{BW} = 0.40 (Capture Efficiency for blanket wash)

CE = Control Device Efficiency

Et_{VOC} = Qty of each used (gallons) × VOC content as applied (lb/gal)

RC_{VOC} = Qty of roller cleaner used (gallons) × VOC content as applied (lb/gal)

R = 1.0 or 0.50 (Fraction of cleanup solvent unrecovered)

An "R" factor of 0.50 (50 percent VOC credit) may be used for solvents (vapor pressure ⩽ 5 mm Hg at 68°F) used to manually clean press components if the rags/wipes used to manually clean press components are stored in closed/sealed containers immediately after use and the company can document the quantity of solvent recovered.

viii. For control device C1, a daily record of the temperature on the inlet and outlet side of the catalyst bed shall be recorded.

ix. For control device C2, a temperature monitoring device shall be installed in the combustion chamber or in the ductwork immediately downstream of the combustion chamber in a position before any substantial heat exchange occurs. The temperature readings shall be recorded at least once per day for each operating day.

x. The owner or operator shall maintain daily records of any periods of time where the processes were operating and the control devices were not operating or a declaration that the control devices operated at all times that day when the processes were operating.

xi. If there is any time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:

(i) Date;
(ii) Start time and stop time;
(iii) Identification of the control device and process equipment;
(iv) VOC emissions during the bypass;
(v) Summary of the cause or reason for each bypass event;
(vi) Corrective action taken to minimize the extent or duration of the bypass event; and
(vii) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

xii. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) for each VOC containing raw material used at this plant.

b. **HAP**

i. The owner or operator shall monitor and maintain records of the name, quantity used, and HAP content for each of the following raw materials: inks, fountain solution concentrate, fountain solution additive, blanket wash, roller wash, press cleaning materials, and any other HAP containing material used during each calendar month and consecutive 12-month period.

ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plantwide emissions for each individual HAP and total HAP for each calendar month.

iii. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) for each HAP containing raw material used at this plant.

S3. **Reporting** (Regulation 2.17, section 5.2)

a. **VOC**

i. Monthly and 12 consecutive month VOC emissions for each month for:

1) Emission Point E1,
2) Emission Point E2,
3) Emission Point E3, and

4) Plant-wide Emission Points.

ii. Identification of all periods of exceeding a VOC emission limit or standard specified, including the quantity of excess emissions. If no excess VOC emissions occur during a reporting period, the owner or operator shall submit a negative declaration.

iii. For Emission Point E2:

1) Summary report identifying all periods of bypassing the catalytic oxidizer (C2) while the heatset web press was in operation. The report shall include the date, the cause and duration (including the start and stop time) of each bypass event, the VOC emissions during each bypass event, and description of any corrective action taken for each bypass event; and

2) Identification of all periods when the inlet temperature to the catalyst bed was below the required temperature while the heatset web press was in operation.

iv. For Emission Point E3:

3) Summary report identifying all periods of bypassing the thermal oxidizer (C3) while the heatset web press was in operation. The report shall include the date, the cause and duration (including the start and stop time) of each bypass event, the VOC a emissions during each bypass event, and description of any corrective action taken for each bypass event; and

4) Identification of all periods when the inlet temperature to the thermal oxidizer was below the required temperature of while the heatset web press was in operation.

b. **HAP**

i. Monthly and 12 consecutive month total and single HAP plantwide emissions for each month;

ii. Identification of all periods of exceedances of the emission standard including the quantity of excess emissions; and

iii. Description of any corrective action taken for each exceedance.

U1 Comments

1. The following table summarizes the compliance monitoring methods to reasonably assure compliance with District regulations and the terms and conditions of this permit:

Pollutant	Monitoring	Record Keeping	Frequency
VOC	Raw material usage	Record the monthly usage of each VOC containing material	Monthly
	Emissions	Calculate and record the calendar month and rolling 12-month total VOC emissions	Monthly
	Fountain solution temperature	Record the temperature of each fountain solution reservoir	Daily
	Fountain solution VOC content	See Specific Condition S2.a.vi.	As required
	Raw material VOC content	Maintain a copy of the MSDS for each VOC containing material used	Continuous
HAP	Emissions	Calculate and record the calendar month and rolling 12-month total HAP emissions	Monthly
		Maintain a copy of the MSDS for each HAP containing material used	Continuous

Emission Unit U2: Pizza Dough Making Operation for Papa John's

U2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for New Process Operations	1 through 3

U2 Equipment:

Emission Point	Description	Applicable Regulation	Control ID
E4	Two (2) Flour Silos (1A), Shick Tube-veyor Corp.	7.08	C3
E5	Salt Silo (2A), Shick Tube-veyor Corp.		C4
E6	Sugar Silo (3A), Shick Tube-veyor Corp.		C5
E7	Three (3) Minor Ingredient Hoppers (4A), Shick Tube-veyor Corp.		C6
E8	Mix Station (5A), Shick Tube-veyor Corp.		C7
E9	Yeast Dump Station (6A), Shick Tube-veyor Corp.		C8

U2 Control Devices:

Control ID	Description	Pollutant Controlled
C3	Bag Dust Collector (1B)	PM
C4	Bag Dust Collector (2B)	
C5	Bag Dust Collector (3B)	
C6	Three (3) Bag Dust Collectors (4B)	
C7	Bag Dust Collector (5B)	
C8	Cartridge Dust Collector (6B)	

U2 Specific Conditions

S1. **Standards** (Regulation 2.17, section 5.1)

a. **PM**

i. For Emission Points E4, E5, and E6, the owner or operator shall not allow or the cause the PM emissions to exceed 26.41 lb/hr for each silo.[5] (Regulation 7.08, section 3.1.2) (Permit 137-10-C, effective 12/21/2010)

ii. For Emission Point E7, the owner or operator shall not allow or the cause the PM emissions to exceed 19.24 lb/hr for each hopper.[5] (Regulation 7.08, section 3.1.2) (Permit 137-10-C, effective 12/21/2010)

iii. For Emission Point E8, the owner or operator shall not allow or the cause the PM emissions to exceed 9.74 lb/hr for the mix station.[5] (Regulation 7.08, section 3.1.2) (Permit 137-10-C, effective 12/21/2010)

iv. For Emission Point E9, the owner or operator shall not allow or the cause the PM emissions to exceed 9.12 lb/hr for the yeast dump station.[5] (Regulation 7.08, section 3.1.2) (Permit 137-10-C, effective 12/21/2010)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20 % opacity. (Regulation 7.08, section 3.1.1)

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **PM**

The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of the dust collectors for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

[5] A one-time compliance demonstration has been performed for each piece of equipment for PM, and the lb/hr standards cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, or reporting requirements with respect to the PM lb/hr standard.

b. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of each emission process. No more than four (4) emission processes shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission processes where visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within twenty-four (24) hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what, if any, corrective action was performed. If an emission process is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **PM**

There are no reporting requirements for this equipment with respect to PM.

b. **Opacity**

i. The emission unit ID numbers and emission process ID numbers for each exceedance;
ii. The beginning and ending date of the reporting period;
iii. The number of surveys where visible emissions were observed;
iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
v. A description of any corrective action taken for each exceedance.
vi. If no deviations occur, the report shall contain a negative declaration.

Insignificant Activities

Preferred Marketing Solutions		
Equipment	**Quantity**	**Regulation Basis**
Combustion Sources < 10 MMBtu/hr natural gas room unit heaters	7; NOx = 2.43 tpy each VOC = 0.2326 tpy each	Regulation 1.02, Appendix A section 1.1
Kodak NexPress 2100 Copier	1; VOC = 0.01 tpy	Regulation 1.02, section 1.38.3

P.J. Food Services, Inc.		
Equipment	**Quantity**	**Regulation Basis**
Natural Gas Combustion Sources < 10 MMBtu/hr	2 @ 0.20 MMBtu/hr NOx = 0.086 tpy each VOC = 0.0047 tpy each 3 @ 0.36 MMBtu/hr NOx = 0.1524 tpy each VOC = 0.0084 tpy each 5 @ 0.30 MMBtu/hr NOx = 0.1284 tpy each VOC = 0.0071 tpy each	Regulation 1.02, Appendix A section 1.1

1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.

2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.

3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.

4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.

6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.