Puget Sound Clean Air Agency

Notice of Construction No. **12314**

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

Registration No. **11285**

Date

Installation of one (1) 4.75 MMBtu/hr Baker Perkins direct-fired tray oven equipped with two (2) natural gas burners for baking yeast-leavened bread products with a capacity of baking a maximum of 147,744 pounds of product per day (lb/day). Installation of one (1) 4,500 SCFM, CSM Recuperative Catalytic Oxidation System, Model 45A with a 1.6 MMBTU/hr natural gas burner. Catalytic oxidation system will control emissions from the new oven.

OWNER

Franz Seattle Division - 6th Ave.
PO Box 2609
Vancouver, WA 98661

INSTALLATION ADDRESS

Franz Seattle Division - 6th Ave.
2901 6th Ave S
Seattle, WA 98134

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound 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.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

Recuperative Catalytic Oxidizer Emissions

3. All emissions from the oven shall be vented through the recuperative catalytic oxidizer at all times.
4. There shall be no visible emissions from the recuperative catalytic oxidizer exhaust stack.
5. At least once every calendar quarter, while baking at normal operating capacity, the owner or operator shall observe the emissions from the recuperative catalytic oxidizer stack throughout the entire baking cycle. During the time of the observation the owner or operator shall note the highest and lowest catalyst bed temperatures. For each observation, note the date and time of the observation, the observer's name, whether or not visible emissions were observed, and the catalyst bed temperatures.

VOC Control Efficiency

6. The recuperative catalytic oxidizer shall achieve and maintain a minimum VOC control efficiency of 95% at all times during operation.
7. The owner or operator shall verify compliance with the minimum control efficiency of 95% with an initial source test.
    a. Source test shall measure VOC concentration at the inlet and outlet of the oxidizer to determine the control efficiency
    b. A source test plan must be submitted to the Agency for approval within 60 days after initial startup of the oven burners
    c. The test plan must include a description of operating conditions during the test for both the oven and the recuperative catalytic oxidizer and a list of operating parameters that will be measured during the test for both the oven and the recuperative catalytic oxidizer.

d. A source test must be conducted within 180 days after initial startup of the oven burners and follow the approved test plan.
e. A source test must be conducted once every five years, no sooner than 4 years and 9 months after the last test and no later than 5 years and 3 months after the last stack test.
f. Source test shall be conducted in accordance with USEPA CTM-042. The test shall be conducted while the oven is venting to the oxidizer and is baking at normal operating capacity.
g. Source test must be performed according to Regulation 1, Article 3: Section 3.07.
h. The source test report shall include a description of operating conditions achieved during the test for both the oven and the recuperative catalytic oxidizer and values of all operating parameters during the test for both the oven and the recuperative catalytic oxidizer.

8. The owner or operator may request in writing that the stack testing frequency be decreased after the ten years of operation. The testing frequency may be decreased upon approval by the Agency.

Oxidizer Catalyst Requirements

9. Both the inlet and outlet catalyst bed temperatures shall be maintained at a minimum of 600 degrees Fahrenheit whenever the equipment it serves is in operation.

10. 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 Part 64.7. Such a temperature measuring system shall have an accuracy of within +/- 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable EPA method or other method approved by the Agency.

11. The owner or operator must conduct annual catalyst activity testing following the manufacturer's or catalyst supplier's recommended procedures. The annual catalyst activity test results, including curves, tables, and reports, must be submitted to the agency. Cleaning should be performed when the activity test results or report indicates cleaning or replacement is necessary.

12. The owner or operator shall replace the catalyst bed if the activity test indicates replacement is necessary. At a minimum the catalyst must be replaced at the frequency recommended by the manufacturer.

13. A log containing the date and a description of each catalyst cleaning and each catalyst replacement shall be kept.

Recuperative Catalytic Oxidizer Operation, Maintenance, and Corrective Actions

14. The owner or operator must maintain daily records of key system operating parameters of the recuperative catalytic oxidizer. If the oven is not in operation, this should be noted in the daily record. Key system operating parameters shall be identified and submitted to the agency within 90 days of installation and must be based on the operation and maintenance plan and preventative maintenance plan provided by the manufacture after equipment installation. The operation and maintenance plan shall be submitted to the agency within 90 days of installation. Key Parameters shall include but are not limited to:

i. Inlet and outlet temperature of the catalyst bed
ii. Pressure drop across the catalyst

15. If observations taken under Condition 5 show that the oxidizer is out of compliance with conditions 4 or 9, the baking process shall be shut down until the problem is fixed. The date of the noncompliance, a description of the noncompliance and actions taken to resolve it shall be logged at the time the actions are taken.

16. In the event of a recuperative catalytic oxidizer thermocouple failure or in the event of any other failure such that the owner or operator cannot meet Conditions 4 or 9, the baking process shall be shut down until the problem is fixed. The date of the failure, a description of the failure and actions taken to resolve it shall be logged at the time the actions are taken.

Recordkeeping

17. The owner or operator must maintain records needed to calculate or otherwise determine VOC emissions for this oven including type of product, initial and final yeast percentage, spiking time, and yeast action time.
18. All logs or records maintained in compliance with this Order of Approval shall be kept for at least five years and made available to Agency personnel upon request. Electronic data collection of key parameter is acceptable.
19. Upon issuance, this NOC 12314 will cancel and supersede NOC 11331 issued June, 7, 2017.

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

Madeline McFerran	John Dawson
Reviewing Engineer	Engineering Manager