COMMONWEALTH OF
PUERTO RICO
Environmental Quality Board

FINAL TITLE V OPERATING PERMIT
AIR QUALITY AREA
ENVIRONMENTAL QUALITY BOARD

Permit Number:	PFE-TV-2051-70-0611-0368
Application Receipt Date:	June 13, 2011
Final or Effective Issue Date:	**October 5, 2015**
Expiration Date:	**October 15, 2020**

In accordance to the provisions of Part VI of the Regulation for Atmospheric Pollution Control (RCAP) and the provisions of the Code of Federal Regulations (CFR), Title 40, Part 70

HOLSUM DE PUERTO RICO, INC.
TOA BAJA, PUERTO RICO

hereinafter referred to as "**the permittee**" or **Holsum,** is authorized to operate a stationary source of air pollutants consisting of the emission units described in this permit. Until such time as this permit expires, is modified or revoked, the permittee may emit air pollutants as a result of those processes and activities directly related to and associated with the emission sources, according to the requirements, limitations and conditions of this permit, until the expiration date or until it is modified or revoked.

The conditions of the permit are enforceable by the federal and state government. Those requirements that are enforceable only by the state government are identified as such in the permit. A copy of the permit must be kept in the aforementioned facility at all times.

Cruz A. Matos Environmental Building
Urb. San José Industrial Park, 1375 Ave. Ponce de León, San Juan, PR 00926-2604
P.O. Box 11488, San Juan, PR 00910
Tel. 787-767-8181, Fax 787-767-4861
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Section I - General Information

A. Facility Information

Company Name	Holsum de Puerto Rico, Inc.
Postal Address	P.O. Box 8282 Toa Baja, PR 00951-8282
Facility Location	Road Number 2 Km 20.6 Candelaria Ward Toa Baja, PR
Responsible Official	Julio E. Vigoreaux Executive Vice President julio.vigoreaux@holsumpr.com
Contact Person	Néstor I. Hernández Compliance Officer nestor.hernandez@holsumpr.com
Telephone	787-798-8282
Fax	787-251-2328
Primary SIC Code	2051/2052

B. Process Description

Holsum de Puerto Rico Inc. (Holsum) operates a commercial bakery in Toa Baja, Puerto Rico. It is a significant producer and supplier of bread and sweet goods, among which are various breads and rolls, cookies and sweet goods (donuts, cakes, pies, etc.) The facility is divided into two plants, the bread and buns plants, and the cookies and sweet and goods plant. The manufacturing process for all these products is basically the same, it consists of mixing the ingredients, baking, packaging and distribution. The American Bakers Association classifies Holsum as a manufacturer of baking products only. The bread plant produces white sandwich breads (Club Sandwich

Bread) and the roll plant produces hotdog, hamburger and other buns. Bulk quantities of flour are shipped to the facility in tank trucks and conveyed into one of the five storage silos. These silos utilize filters to minimize loss of flour during loading. The flour is weighed and mixed with sugar, yeast, water, and other miscellaneous ingredients. Sugar is shipped in bulk liquid form by tank trucks.

Holsum processes one basic type of dough, sponge dough. Fermentation begins immediately following the initial mixing of ingredients and continues until the yeast is killed in the oven. Fermentation causes sugar and starches to be converted to ethanol, carbon dioxide, and water. At the start of fermentation, a skin forms on the top of the dough. The skin keeps the ethanol and carbon dioxide in the dough, until it breaks during the baking process. The dough is allowed to rise in a high temperature, high humidity "proof box." Steam required for the proof box environment is supplied by internal electric equipment. Baking with yeast occurs in three ovens (EU-06, EU-07 and EU-08) and involves the expansion of the breads and buns to final volume, crust formation, yeast and enzymatic activity inactivation, coagulation of the dough proteins, partial gelatinization of the starch, and reduction of bread moisture. The ovens generate emissions from both the combustion of propane gas and the off-gassing of the bread itself. Finally these products are packaged and distributed around the island.

The combustion sources in Holsum include two boilers (EU-27 and EU-33[1]), three emergency electric generators (EU-16, EU-17 and EU-18), a fire pump (EU-25), and ovens EU-06 through EU-11 and the doughnut fryer (EU-12), which use propane as fuel.

Holsum is a major source of hazardous air pollutants because it has the potential to emit more than 100 tons per year of volatile organic compounds (VOC).

[1] This boiler is not installed yet, but its construction is authorized by the permit PFE-70-1110-0621-I-II-C.

Section II – Emission Units Description and Control Equipment

The emission units regulated by this permit are the following:

Emission Unit	Emission Point	Description	Control Equipment
EU-06	EP-06	**Bread Manufacturing Oven** Capacity of 2.2 MMBtu/hr Consumes 24.3 gph of propane	None
EU-07	EP-07	**Buns Manufacturing Oven** Capacity of 2.2 MMBtu/hr Consumes 24.3 gph of propane	None
EU-08	EP-08, EP-09, EP-10	**SBL Oven (Special Buns Line)** Capacity of 5.103 MMBtu/hr Consumes 56.4 gph of propane	None
EU-09	EP-11, EP-12, EP-13	**Cakes Manufacturing Oven** Capacity of 3.4 MMBtu/hr Consumes 37.6 gph of propane	None
EU-10	EP-14, EP-15, EP-16	**Cookies Manufacturing Oven (80 feet)** Capacity of 1.52 MMBtu/hr Consumes 16.8 gph of propane	None
EU-11	EP-17, EP-18, EP-19	**Cookies Manufacturing Oven (100 feet)** Capacity of 2.56 MMBtu/hr Consumes 28.3 gph of propane	None
EU-12	EP-20, EP-21	**Doughnuts Fryer** Capacity of 1.245 MMBtu/hr Consumes 13.8 gph of propane	None
EU-16	EP-25, EP-26	**Emergency Electric Generator** Make: Cummins ONAN Model: 750 KWDFHA Capacity: 1,006 hp Year of Manufacture: 1995 Displacement: 366 l/cyl Fuel consumption: 54.7 gal/hr	None

Emission Unit	Emission Point	Description	Control Equipment
EU-17	EP-27, EP-28	**Emergency Electric Generator** Make: Cummins ONAN Model: 900 KTA38-G3 Capacity: 1,206 hp Year of Manufacture: 1995 Displacement: 456 l/cyl Fuel consumption: 57 gal/hr	None
EU-18	EP-29, EP-30	**Emergency Electric Generator** Make: Cummins ONAN Model: 900 KTA38-G3 Capacity: 1,206 hp Year of Manufacture: 1995 Displacement: 456 l/cyl Fuel consumption: 57 gal/hr	None
EU-25	EP-37	**Fire Pump** Make: Cummins FIRE PUMP Model: 5LRG16 Capacity: 87 hp Year of Installation: 1995 Fuel consumption: 40 gal/hr 250 hrs/year	None
EU-27	EP-39	**Boiler** Make: Fulton Capacity: 15 hp (0.50 MMBtu/hr) Fuel consumption: 4.5 gal/hr Authorized to operate 7,904 hours/year	None
EU-30	EP-42	**Packaging Coders Cleaning** Uses 250 liters/week of methyl ethyl ketone.	CD-30 Activated Carbon Filter (60% efficiency)
EU-33	EP-45, EP-46, EP-47	**Boiler** Capacity of 26.7 hp Fuel consumption: 7.8 gal/hr	None

Section III – General Permit Conditions

1. **Sanctions and Penalties: Holsum** must comply with all terms, conditions, requirements, limitations and restrictions established in this permit. Any violation to the terms of this permit is subject to administrative, civil or criminal measures, as established in Section 16 of the Environmental Public Policy Act (Law No. 416 of September 22, 2004, as amended).

2. **Right of Entry**: As specified under Rules 103 and 603(c)(2) of the RCAP, **Holsum** shall allow the Board or an authorized representative, upon presentation of credentials and other documents as may be required by law, to perform the following activities:

   a. Enter upon **Holsum** premises where an emission source is located or where emissions related activities are conducted, or where records must be kept under the conditions of this permit, under the RCAP, or under the Clean Air Act;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit, under the RCAP, or under the Clean Air Act;

   c. Inspect and examine any facility, equipment (including monitoring and air pollution control equipment), practices or operations (including QA/QC methods) regulated or required under this permit; as well as sampling emissions of air quality and fuels; and

   d. As authorized by the Clean Air Act and the RCAP, to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

3. **Sworn Statement or Affidavit:** All reports required pursuant Rule 103(D) of the RCAP (i.e., semiannual monitoring reports and annual compliance certification) should be submitted together with a sworn statement or affidavit by the Responsible Official or a duly authorized representative. Such sworn statement or affidavit shall attest to the truth, correctness and completeness of such records and reports.

4. **Data Availability:** As specified under Rule 104 of the RCAP, all emission data obtained by or submitted to the EQB, including data reported pursuant to Rule 103 of the

RCAP, as well as that obtained in any other way, shall be available for public inspection and may also be made available to the public in any additional manner that the EQB may deem appropriate.

5. **Emergency Plan:** As specified under Rule 107 of the RCAP, **Holsum** shall have available an Emergency Plan which must be consistent with adequate safety practices, and provides for the reduction or retention of the emissions from the plant during periods classified by the EQB as air pollution alerts, warnings or emergencies. These plans shall identify the emission sources, include the reduction to be accomplished for each source, and the means by which such reduction will be accomplished. These plans will be available for any authorized representative of the EQB at any time.

6. **Air Pollution Control Equipment : Holsum** shall comply with Rule 108 of the RCAP, as follows:

   a. All air pollution control equipment or control measures shall provide for continuous compliance with applicable rules and regulations. Such equipment or measures shall be installed, maintained, and operated according to those conditions imposed by this Title V permit, within the specified operating limitations of the manufacturer.

   b. The collected material from air pollution control equipment shall be disposed in accordance with applicable rules and regulations. The removal, manipulation, transportation, storage, treatment or disposal will be done in such or manner that shall not to produce environmental degradation, and in accordance with applicable rules and regulations.

   c. The Board may require, when deemed appropriate to safeguard the health and welfare of human beings, the installation and maintenance of additional, complete and separate air pollution control equipment of a capacity equal to the capacity of the primary control equipment. Furthermore, the Board may require that such additional air pollution control equipment be operated continuously and conjunctionally with the primary air pollution control equipment.

   d. All air pollution control equipment shall be operated at all times while the source being controlled is in operation.

e. In the case of a shutdown of air pollution control equipment for the necessary scheduled maintenance, the intent to shutdown such equipment shall be reported to the Board at least three days prior to the planned shutdown. Such prior notice shall include, but is not limited to the following:

i. Identification of the specific source to be taken out of service with its location and permit number.

ii. The expected length of time that the air pollution control equipment will be out of service.

iii. The nature and quantity of emissions of air pollutants likely to be permitted during the shutdown period.

iv. Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period.

v. The reasons why it will be impossible or impractical to shutdown the operating source during the maintenance period.

7. **Compliance Certification:** As specified under Rule 602(c)(2)(ix)(C) of the RCAP, the permittee shall submit each year a compliance certification. This certification must be submitted to both the EQB and the Environmental Protection Agency (EPA)[2] no later than April 1st, covering the previous calendar year. The compliance certification shall include, but is not limited to, the information required under Rule 603(c) of the RCAP as follows:

a. The identification of each term or condition of the permit that is the basis of the certification; and

b. The compliance status. Each deviation shall be identified and taken into account in the compliance certification; and

[2] The certification to the EQB shall be mailed to: Manager, Air Quality Area, P.O. Box 11488, San Juan, P.R. 00910. The certification to the EPA shall be mailed to: Chief, Enforcement and Superfund Branch CEPD, US EPA-Region II, City View Plaza – Suite 7000, #48 Rd. 165 Km 1.2 Guaynabo, P.R. 00968-8069.

c. A statement indicating whether the compliance was continuous or intermittent; and

d. The methods or other means used for determining the compliance status with each term and condition, currently and over the reporting period consistent with sections (a)(3)-(5) of Rule 603 of the RCAP; and

e. Identification of possible exceptions to compliance, any periods which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (CAM) occurred; and

f. Such other facts as the Board may require to determine the compliance status of a source.

8. **Regulation Compliance:** As specified under Rule 115 of the RCAP, any violation to the RCAP, or to any other applicable rule or regulation, shall be grounds for the Board to suspend, modify, or revoke any relevant permit, approval, variance or other authorization issued by the Board.

9. **Location Approval:** As specified under Rule 201 of the RCAP, nothing in this permit shall be interpreted as authorizing the location or construction of a major stationary source, or the modification of a major stationary source, or a major modification of a significant source, without obtaining first a location approval from the Board and without first demonstrating compliance with the National Ambient Air Quality Standards (NAAQS). This permit does not allow the construction of new minor sources without the required permit under Rule 203 of the RCAP.

10. **Objectionable Odors:** As specified under Rule 420 of the RCAP, **Holsum** shall not cause or permit emissions to the atmosphere of any matter which produces an *objectionable* odor that can be perceived in an area other than that designated for industrial purposes. If objectionable odors are detectable beyond the property perimeter, and complaints are received, **Holsum** shall investigate and take measures to minimize and/or eliminate the objectionable odors, if necessary. [This condition is enforceable only by the State]

11. **Permit Renewal Applications:** As established under Rule 602 (a)(1)(iv) of the RCAP, **Holsum** shall submit a permit renewal application applications for permit renewal shall be submitted at least 12 months prior to the date of permit expiration. A responsible official must certify all required applications consistent with paragraph (c)(3) of Rule 602 of the RCAP.

12. **Permit Duration:** As specified under Rule 603 of the RCAP, the following terms will apply during the duration of this permit:

    a. Expiration: This authorization shall have a fixed term of 5 years since the effective date. The expiration date will be automatically extended until the Board approves or denies a renewal application (Rule 605(c)(4)(ii) of the RCAP) but only in those cases where **Holsum** submits a complete renewal application at least twelve (12) months before the expiration date. [Rules 603 (a)(2), 605 (c)(2), and 605(c)(4) of the RCAP]

    b. Permit Shield: As specified under Rule 605 (c)(4)(i) of the RCAP, the permit shield may be extended until the time the permit is renewed if a timely and complete renewal application is submitted.

    c. In case that this permit is subject to any challenge by third parties, the permit shall remain in effect until the time it is revoked by a court of law with jurisdiction in the matter.

13. **Recordkeeping Requirement:** As established under Rule 603(a)(4)(ii) of the RCAP, **Holsum** shall retain records of all required monitoring data and support information for a period of 5 years from the date of the monitoring sample, measurement, report, or application.

14. **Semiannual Monitoring Reports/Samplings:** As established under Rule 603(a)(5)(i) of the RCAP, the permittee shall submit reports to the EQB of all required monitoring every 6 months, or more frequently if required by the Board or any other underlying applicable requirement. These reports cover two major elements. The first element is the summary of all periodic monitoring / sampling required in this permit. The second element requires that all deviations from permit conditions are clearly identified, summarized and reported to the Board. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be

certified by a responsible official as established under Rule 602(c)(3) of the RCAP. The report covering the period from January through June shall be submitted no later than October 1 of the same year and the report covering the period from July through December shall be submitted no later than April 1 of the following year. Once the guidelines are developed by the Board, the permittee must use them to complete these reports.

15. **Deviations Reporting due to Emergencies:** According to Rule 603(a)(5)(ii)(a) of the RCAP, any deviation resulting from an upset (such as sudden malfunction or break-down) or emergency conditions, as defined in Rule 603(e) of the RCAP, must be reported within the next 2 working days from the time the emission limits are exceeded due to the emergency, if **Holsum** wishes to assert the affirmative defense authorized under Rule 603 (e) of the RCAP. If **Holsum** raises the emergency defense upon an enforcement action, the permittee shall demonstrate that such deviation happens due to an emergency and that the Board was adequately notified. If such emergency deviation last for more than 24 hours, the affected units may be operated until the end of the cycle or 48 hours, whichever occurs first. The Board may only extend the operation of an emission source in excess of 48 hours, if the source demonstrates to the Board's satisfaction that the National Air Quality Standards have not been exceeded and that there is no risk to the public health.

16. **Deviation Reporting (Hazardous Air Pollutants):** The source shall act as specified in its Emergency Response Plan (established in Rule 107 (C) of the RCAP), when such Plan has shown no significant impact on an area other than those that have been designated for industrial purposes or will cease operations immediately if there is a significant impact on an area other than those that have been designated for industrial purposes (state-only enforceable condition). In accordance with Rule 603(a)(5)(ii)(b) of the RCAP, the Board shall be notified within the next 24 hours if a deviation that results in the release of emissions of hazardous air pollutants for more than an hour in excess of the applicable limit occurs. For the discharge of any regulated air pollutant that continues for more than 2 hours in excess of the applicable limit, the permittee shall notify the Board within 24 hours of the deviation. The permittee shall submit to the Board, within 7 days of the deviation, a detailed written report which includes probable causes, time and duration of the deviation, remedial action taken and the steps you are following to prevent recurrence.

17. **Severability Clause:** As specified under Rule 603(a)(6) of the RCAP, the clauses in this permit are severable. In the event of a successful challenge to any portion of the permit in an administrative or judicial forum, or in the event any of its clauses is held to be invalid, all other portions of the permit shall remain valid and effective, including those related to emission limits, terms and conditions, be they specific or general, as well as monitoring, record keeping and reporting requirements.

18. **Permit Noncompliance:** According to Rule 603(a)(7)(i) of the RCAP, **Holsum** must comply with all conditions of the permit. Permit noncompliance constitutes a violation of the RCAP and will be grounds for taking the appropriate enforcement action, impose sanctions, revoke, terminate, modify, and/or reissue the permit, or to deny a permit renewal application.

19. **Defense not Allowed:** As specified under Rule 603(a)(7)(ii) of the RCAP, **Holsum** shall not allege as a defense in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

20. **Permit Modification and Revocation:** As specified under Rule 603(a)(7)(iii) of the RCAP, the permit may be modified, revoked, reopened, reissued, or terminated for cause according to the Law of Uniform Administrative Procedures. The filing of a request by **Holsum** for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

21. **Property Rights:** As specified under Rule 603(a)(7)(iv) of the RCAP, this permit does not convey any property rights of any sort, nor does it grant any exclusive privilege.

22. **Obligation to Furnish Information:** As specified under Rule 603(a)(7)(v) of the RCAP, **Holsum** shall furnish to the EQB, within a reasonable time, any information that the EQB may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, **Holsum** shall also furnish to the EQB copies of documents related to this permit.

23. **Prohibition on Default Issuance:** As specified under Rule 605(d) of the RCAP, it shall never be considered that a permit has been issued by default as a result of the EQB's

failure to take final action on a permit application within 18 months. The EQB's failure to issue a final permit within 18 months should be treated as a final action solely for the purpose of obtaining judicial review in a state court.

24. **Administrative Permit Amendments and Permit Modifications:** As specified under Rule 606 of the RCAP, the permit shall not be amended nor modified unless **Holsum** complies with the requirements for administrative permit amendments and permit modifications as described in the RCAP.

25. **Permit Reopening:** As specified under Rule 608(a)(1), this permit shall be reopened and revised under the following circumstances:

    a. Whenever additional applicable requirements under any law or regulation become applicable to **Holsum**, when the remaining permit term is of 3 or more years. Such reopening shall be completed 18 months after promulgation of said applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to Rule 605(c)(4)(i) or Rule 605(c)(4)(ii) of the RCAP.

    b. Whenever the EQB or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

    c. Whenever the EQB or the EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

26. **Changes in Name or Responsible Official:** This permit is issued to **Holsum de Puerto Rico, Inc.** In the event that the company and/or facility change its name, the responsible official must submit an administrative amendment to this permit to reflect the change in name. If the event that the responsible official changes, the new responsible official must submit no later than 30 days after the change, an administrative amendment including a sworn statement in which he/she accepts and promises to comply with all the conditions of this permit.

27. **Changes in Ownership**: This permit is issued to **Holsum de Puerto Rico, Inc.** In the event that the company and/or facility is transferred to a different owner or change

operational control and the Board determines that no other change in the permit is necessary, the new responsible official must submit an administrative amendment. The administrative amendment shall include a sworn statement in which the new responsible official accepts and promises to comply with all the conditions of this permit, and a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee. This is not applicable if the Board determines that changes to the permit are necessary.

28. **Renovation Work/ Demolition: Holsum** shall comply with the provisions set forth in 40 CFR §61.145 and §61.150, and Rule 422 of the RCAP, and Regulations for the Processing of General Permits (General Permit for the Handling of Asbestos Containing Materials) when doing renovation or demolition activities of asbestos containing materials at the facility.

29. **Risk Management Plan:** If during the effectiveness of this permit, **Holsum** is subject to the 40 CFR part 68, the permittee shall submit a Risk Management Plan according with the compliance schedule in the 40 CFR part 68.10. If during the effectiveness of this permit, **Holsum** is subject to the 40 CFR part 68, the permittee shall submit a compliance certification with the requirements of part 68 as part of the annual compliance certification required under 40 CFR part 70, including the recordkeeping and the Risk Management Plan.

30. **General Duty: Holsum** has the general obligation of identifying hazards which may result from accidental releases of any controlled substance under section 112(r) of the Clean Air Act or any other extremely hazardous substance in a process, using appropriate hazard assessment techniques, designing, maintaining, and operating a safe facility and minimizing the consequences of accidental releases if they occur as required in section 112(r)(1) of the Act and Rule 107(D) of the RCAP.

31. **Requirements for Refrigerants (Climatologic and Stratospheric Ozone Protection):**

    a. In the event that **Holsum** has equipment or appliances, including air conditioning units, which use Class I or II refrigerants as defined in 40 CFR part 82, subpart A, Appendices A and B, **Holsum** shall take the necessary measures to ensure that all maintenance, service or repair services performed are done so according to the practices, certification and personnel requirements,

disposition requirements, and recycling and/or recovery equipment certification requirements specified under 40 CFR part 82, subpart F.

b. Owners/ operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

c. Service on Motor Vehicles: If **Holsum** performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), **Holsum** is subject to all the applicable requirements as specified in 40 CFR part 82, subpart B, Servicing of Motor Vehicle Air Conditioners. The term motor vehicle as used in subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term MVAC as used in subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.

32. **Labeling of Products Using Ozone-Depleting Substances: Holsum** shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR part 82, subpart E.

a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.

b. The placement of the required warning statement must comply with the requirements pursuant to 40 CFR §82.108.

c. The form of the label bearing the required warning statement must comply with the requirements pursuant to 40 CFR §82.110.

d. No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

33. **Roof Surface Coating:** **Holsum** shall not cause or permit the roof surface coating by applying hot tar or any other coating material containing organic compounds without previous notification to the Board. The use of used oil or hazardous waste for roof surface coating is prohibited.[State enforceable only]

34. **Open Burning:** Pursuant to Rule 402 of the RCAP, **Holsum** shall not cause or permit the open burning of refuse in their premises except as established under paragraph (E) of such rule which authorizes to conduct training or research of firefighting techniques, as previously approved by the Board.

35. **Fugitive Emissions:** Compliance with Rule 404 of the RCAP :

    a. **Holsum** shall use water or suitable chemicals for chemical stabilization and the control of dust in the demolition of a building or structures, construction operations, quarrying operations, the grading of roads, or the clearing of lands.

    b. **Holsum** shall not cause or permit the discharge of visible emissions of fugitive dust beyond the boundary line of the property on which the emissions originate.

    c. When air pollutants escape from a building or equipment and cause and nuisance or violate any regulations, the Board may order that building or equipment in which processing, handling, and storage are done, be tightly closed and/or ventilated so that all emissions from the building or equipment are controlled to remove or destroy such air pollutants before being discharged to the open air. The implementation of this measure should not create occupational health hazards.

36. **Compliance Clause:** Under no circumstances does compliance with this permit exempt **Holsum** from complying with all other applicable state or federal laws, regulations, permits, administrative orders or applicable court orders.

37. **Emissions Calculations: Holsum** shall submit, on or before **April 1st of each year**, the actual or permissible emissions calculations for the previous natural year. The emissions calculations shall be submitted on the forms prepared by the Board for this

purpose and the responsible official must certify all the information submitted as true, correct and representative of the permitted activity.

38. **Annual Fee:** As specified under Rule 610 of the RCAP, **Holsum** must submit an annual payment based on the emissions calculations for each regulated pollutant. The payment will be based on their actual emissions at a rate of $37.00 per ton, unless the Board decides otherwise as permitted under Rule 610(b)(2)(iv) of the RCAP. This payment for the previous year must be made on or before **June 30 of each year**.

39. **New or Amended Regulation:** Whether a federal or state regulation is promulgated or amended and the facility is affected by it, the owner or operator shall comply with the requirements of the new or amended regulation.

40. **Reports:** Unless a permit condition establishes otherwise, any requirement of information submittal to the Board shall be addressed to: Manager, Air Quality Area, PO Box 11488, San Juan, P.R. 00910.

41. **Reservation of Rights:** Except as expressly provided in this Title V permit:

a. Nothing herein shall prevent Board or the EPA from taking administrative enforcement measures or seeking legal or equitable relief to enforce the terms of the Title V permits, including but not limited to the right to seek injunctive relief, and imposition of statutory penalties and/or fines.

b. Nothing herein shall be construed to limit the rights of the Board or the EPA to undertake any criminal enforcement activity against **Holsum** or any person.

c. Nothing herein shall be construed to limit the authority the Board or the EPA to undertake any actions in response to conditions that present an imminent and substantial endangerment to public health or welfare, or the environment

d. Nothing herein shall be construed to limit **Holsum's** rights to administrative hearing and judicial appeal of termination/ revocation/ disputes over modification/ denial actions in accordance with regulations and the Environmental Public Policy Act.

Section IV – Permissible Emissions

A. The emissions described in the following table represent the allowable emissions of the facility at the time of the permit application and shall be used for fee purposes only. According to Resolution RI-06-02[3], the emissions calculations will be based on **Holsum's** actual emissions, however calculations based on the facility's allowable emissions will be accepted. If **Holsum** decides to perform the calculations based on allowable emissions, **Holsum** shall pay the same charge per ton as the facilities that decide to do calculations based on their actual emissions. Also, when **Holsum** requests a modification, administrative change or minor modification to its Title V permit, the source will pay only those charges related with any emission increase (if any) per ton, based on the change and not based on the previous total charges in accordance with Rule 610(a) of the RCAP.

Pollutants	Emissions (tons/year)
PM	1.42
PM_{10}	0.97
SO_2	2.13
NO_x	26.75
CO	7.46
VOC	250.57
CO_2e	9,511.54

[3]EQB Resolution - Payment procedure for Title V operating charges and Title V permit renewal charges, issued on March 20, 2006.

Section V – Permit Specific Conditions

A. Bread and Buns Production

EU-06, EU-07, EU-08 Bread and Buns Ovens and SBL Oven

Condition	Parameter	Value	Units	Test Method	Method Frequency	Recordkeeping Requirements	Reports Frequency
Production Limit	Bread Production Limit	53,345,528	pounds/year	Records	Daily	Logbook	Semiannual
	Buns Production Limit	21,513,660	pounds/year	Records	Daily	Logbook	Semiannual
Emission limit VOC	VOC	3 15	lbs/hr lbs/day	See compliance plan	See compliance plan	See compliance plan	See compliance plan

1. Bread Production Limit

a. The bread and buns production limit in the ovens EU-06, EU-07 and EU-08 shall be limited to 53,345,528 and 21,513,600 pounds per year, respectively. [PFE-LC-70-0106-0026-I-II-O]

b. Holsum shall keep daily records of the type and amount of bread or buns produced daily in each oven. It shall be available for inspection by EQB's technical personnel. [PFE-LC-70-0106-0026-I-II-O]

c. The permittee shall submit semiannually a summary of the bread and buns production, in the semiannual report required by condition **III.14** of this permit.

d. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application.

2. VOC Emission Limit

a. According to Rule 419 of the RCAP, Holsum shall not permit the emission of 3 pounds per hour or 15 pounds per day of VOC in any article, machine, equipment or any other contrivance unless it is provided with a control system, pollution prevention and reductions mechanisms or programs or both, as approved or required by the Board. [State enforceable only].

b. Holsum shall follow the next itinerary to achieve compliance with the previous condition in the ovens EU-06 and EU-07:

Compliance Plan	Date
Conduct stack test in the ovens EU-6 and EU-07	September 18, 2013
Submit stack test report	November 18, 2013
Identify the technology and obtain approval for the capital spending	December 20, 2013
Order the equipment	February 21, 2014
Apply EQB for a construction permit. Must submit evidence of compliance with the environmental document, with the permit application	April 21, 2014
Equipment receipt and installation	August 22, 2014
Equipment Validation	October 24, 2014
Conduct stack tests to validate compliance	December 26, 2014
Apply for a Title V permit revision according to Rule 606 of the RCAP	February 26, 2015

c. Holsum must submit quarterly progress reports, beginning on December 20, 2013, which will cover the previous three month period.

d. Any modification to the dates included in the previous schedule must be previously approved by the Board in writing.

e. Holsum shall ensure that the emissions coming from the elaboration of yeast products in the SBL oven in unit EU-08 do not exceed 3 pound per hour or 15 pounds per day of VOC, in compliance with Rule 419 of the RCAP. Holsum shall maintain daily records indicating: type and amount of product, VOC emission factor for each type of product elaborated and VOC emissions, in lbs/hr and lbs/day.

f. Holsum shall calculate the VOC emissions using an emission factor of 13 lbs/ton for the production of bread and buns, as approved in the permit PFE-LC-70-0106-0026-I-II-O. However, Holsum may request the use of a different emission factor based on stack test results, or the equation in section 9.9.6 of the AP-42, subject to the previous written approval of the EQB, or by a construction permit.

g. Holsum shall maintain records for each type of product (for example, bread, buns, etc.) with the following information. They shall be available for inspection by the EQB technical personnel.

   i. Amount of mass produced (tons)

   ii. Initial baker's percent of yeast, (Yi)

   iii. Total yeast action time in hours (ti)

   iv. Final (spike) baker's percent of yeast (S)

   v. Spiking time, in hours (ts)

h. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application.

B. Fuel Use in the Ovens and the Doughnut Fryer

EU-06, EU-07, EU-08, EU-09, EU-10, EU-11, EU-12

Condition	Parameter	Value	Units	Test method	Method Frequency	Recordkeeping Requirements	Reports Frequency
Fuel Use Limit	Propane	995,410	gal/year	Consumption Records	Monthly	Records	Semiannual Annual
Visible Emissions	opacity	20	Percent (6 minutes average)	Records of type of fuel	Monthly	Records	Semiannual
Sulfur Content Limit	Sulfur Content	0.05 (0.027)	Weight Percent (gr/ 100 ft^3)	Fuel Supplier Analysis	With each receipt	Records of the sulfur content in the fuel	Semiannual Annual

1. Fuel Use Limit

a. The amount of propane used in the manufacturing ovens and the doughnut fryer shall not exceed 995,410 gal/year, based in a 12 month rolling period. This number is based on the hourly propane fuel consumption in each oven, in 19 daily hours and 260 days per year, according to the permit PFE-70-1110-0621-I-II-C.

b. Holsum shall keep monthly records with the hours of operation, type and fuel consumption in each oven and the fryer. They shall be available for inspection by EQB's technical personnel. [PFE-70-1110-0621-I-II-C]

c. The permittee shall submit, with each semiannual report and the annual certification, an annual summary of the information in the reports indicating the fuel consumption in monthly and annual terms. This report shall be sent together with the semiannual report required in condition III.14 in this permit

d. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application. This includes the monthly fuel consumption reports and the sulfur content of the fuel burned.

2. Visible Emissions Limit

a. The permittee shall not exceed an opacity limit of 20% in a 6 minute average. [Rule 403(A)(1) of the RCAP]

b. Holsum shall demonstrate compliance with this condition by keeping records of the type of fuel used in the ovens (propane). This records shall be available for inspection by EQB's technical personnel.

3. Sulfur Content Limit

a. The amount of sulfur in the fuel burned in the manufacturing ovens and the doughnut fryer shall not exceed 0.05% by weight (0.027 gr/100 ft^3). [PFE-70-1110-0621-I-II-C]

b. Holsum shall keep a copy of the fuel supplier certification each time the fuel is received in the facility. Such certification shall indicate the sulfur content in the fuel, to demonstrate compliance with the previous condition.

c. Holsum shall submit a report every 6 months indicating in a monthly basis the fuel consumption, the hours of operation and the sulfur content (weight percent) in the fuel burned in each oven and the fryer. This report shall be sent to the Data Validation and Mathematical Modeling Division of the Air Quality Area of the EQB no later than the next 15 days from the end of each period of six calendar months for which the report is representative. The report that covers the period from January to June shall be submitted no later than July 15 of the same year and the report that covers the period from July to December shall be submitted no later than January 15 of the next year. A copy of this report must be kept at the facility for inspection by EQB's technical personnel.

d. Holsum shall submit a summary with the information included in these reports in the annual compliance certification.

e. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a

period of 5 years from the date of the monitoring, sample, measurement, report or application. This includes a record of the monthly fuel consumption reports and the sulfur content of the fuel burned.

C. EU-27, EU-33[4]: Two boilers

Condition	Parameter	Value	Units	Test method	Method Frequency	Recordkeeping Requirements	Reports Frequency
Fuel Consumption Limit	Diesel	35,568 (EU-27) 68,140.8 (EU-33)	Annual Gallons	Consumption	Daily	Records	Semiannual Annual
Visible Emissions Limit	Opacity	20	Percent	Method 9	Stack test during the first year of the permit	Test Results	60 days after the test
Sulfur Content Limit	Sulfur Content	0.5 (EU-27) 0.05 (EU-33)	Weight Percent	Fuel Supplier Certification	With each fuel receipt	Records of the fuel sulfur content with each receipt	Semiannual Annual
Particulate Matter Emission Limit	Particulate Matter	0.3	lb/MMBtu	Stack test using Method 5 of Appendix A, 40 CFR Part 60	Once during the first year of the permit	Keep a copy of the final report	60 days after the test
40 CFR Part 63 Subpart JJJJJJ	See condition 5 in this section	--	--	--	--	--	--

1. Fuel Consumption Limit

a. The diesel fuel consumption of boilers EU-27[5] and EU-33 shall not exceed 35,568 and 68,140.8 gallons per year, respectively, based in a 12 month rolling period. [PFE-LC-70-0106-0120-II-C, PFE-70-1110-0621-I-II-C]

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[4] The boiler in the emission unit EU-27, whose construction was authorized by the permit PFE-70-1110-0621-I-II-C, is not installed at the issuance date of the draft permit. Holsum shall comply with the applicable conditions to this boiler once it starts operation.

[5] The fuel consumption is based on 7,904 hours of operation per year, at a fuel rate of 4.5 gal/hr, as authorized in the permit PFE-LC-70-0106-0120-II-C.

b. Holsum shall install, maintain and operate a fuel flow meter at the inlet of each boiler in order to verify the fuel consumption. The flow meter shall be operated, maintained and calibrated according to the manufacturer's recommendations.

c. Holsum shall keep record indicating the date, time and calibration results. These records shall be available for inspection by EQB's technical personnel.

d. Holsum shall use the information obtained by the fuel flow meters in the boilers to keep a monthly record indicating the fuel consumption in the boilers. Compliance with the fuel limit based on a 12 month rolling period shall be determined by calculating the fuel consumption of that month, and adding it to the total fuel consumption of the previous 11 months.

e. Holsum shall submit a construction permit modification if it wants to use another type of fuel in the EU-27 and EU-33 boilers, according to the requirements established in Rule 203 of the RCAP.

f. The permittee shall submit with each semiannual report and each compliance certification, an annual summary of the reports indicating the fuel consumption on a monthly and annual basis. This report shall be sent with the semiannual report required by condition III.14 of this permit.

g. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application. This includes a record of the monthly fuel consumption reports and the sulfur content of the fuel burned.

2. **Visible Emissions Limit**

a. The opacity from the chimney stacks of the boilers shall not exceed 20% (6 minute average). However, the permittee may discharge visible

emissions with an opacity of 60% for a period no longer than 4 minutes in any consecutive 30 minutes. [Rule 403 of the RCAP]

b. Holsum shall hire an independent opacity reader, certified in a school approved or endorsed by the EPA or the EQB to make one opacity reading on the chimney stack of each boiler during the first year of the permit using Method 9 described in Appendix A of 40 CFR Part 60. The boilers shall be operating at the time of the opacity reading. In the event that boiler EU-33 is not installed during the first year of the permit, the opacity reading shall be done 60 days after achieving maximum capacity but no later than 180 days after commencing operation.

c. The opacity tests shall comply with the test methods in Rule 106 of the RCAP:

i. You shall submit a detailed test protocol at least 30 days prior to the readings. [Rule 106 (C) of the RCAP]

ii. You shall provide the Board at least 15 days of prior written notification of the test under Method 9 to afford the EQB the opportunity to have an observer present. [Rule 106(D) of the RCAP]

iii. You shall submit 2 copies of the initial test reports under Method 9 within 60 days after the performance of the tests. This report shall have the information required by Rule 106(E) of the RCAP.

d. Holsum shall submit a summary with the test results in the semiannual report and the annual compliance certification corresponding to the period when the tests were conducted.

e. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application.

3. Sulfur Content Limit

a. The sulfur content of the diesel fuel used in the boiler EU-27 shall not exceed 0.5% weight. The sulfur content in the diesel fuel in the boiler EU-33 shall not exceed 0.05 % weight. [PFE-LC-70-0106-0120-II-C, PFE-70-1110-0621-I-II-C]

b. Holsum shall keep a copy of the diesel fuel supplier certification each time the fuel is received in the facility. Such certification shall indicate the sulfur content in the fuel, to demonstrate compliance with the previous condition.

c. Holsum shall submit a report every six months indicating on a monthly basis the sulfur content (weight percent) in the fuel burned and the amount of fuel burned in the boilers. This report shall be sent to the Data Validation and Mathematical Modeling Division of the Air Quality Area of the EQB no later than the next 15 days from the end of each period of six calendar months for which the report is representative. The report that covers the period from January to June shall be submitted no later than July 15 of the same year and the report that covers the period from July to December shall be submitted no later than January 15 of the next year. A copy of this report must be kept at the facility for inspection by EQB's technical personnel.

d. Holsum shall submit a summary with the information included in these reports in the annual compliance certification.

e. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application. This includes records of the monthly fuel reports and the sulfur content in the fuel burned.

4. Particulate Matter Emission Limit

a. Holsum shall not cause or permit the emission of particulate matter in excess of 0.30 lbs/MMBtu of heat input from any fuel burning equipment, burning solid or liquid fuel. [Rule 406 of the RCAP]

b. Holsum shall conduct a performance test during the first year of the permit using Method 5 of the 40 CFR Part 60, Appendix A, to determine the particulate matter concentration in the chimney stack during representative operating periods.

c. Holsum shall submit at least 30 days prior to the start of the test, a detailed test protocol describing all test equipment, procedures and Quality Assurance measures to be utilized. [Rule 106(C) of the RCAP]

d. Holsum shall provide the Board at least 15 days of prior written notification of the test under Method 5 to afford the EQB the opportunity to have an observer present [Rule 106(D) of the RCAP]

e. Holsum shall submit 2 copies of the initial test reports under Method 5 within 60 days after the performance of the tests. This report shall have the information required by Rule 106(E) of the RCAP.

f. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application.

5. **National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers (40 CFR Part 63 Subpart JJJJJJ)**

a. Holsum shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers in JJJJJJ Part 63 of the 40 CFR.

b. The compliance date with the provisions of Subpart JJJJJJ for the affected boilers included in this permit will depend on the applicable requirements as described in section 63.11196 of 40 CFR.

c. You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2, respectively,

that apply to the boilers included in this permit. [Section 63.11201(b) of the 40 CFR]

i. For boiler EU-27 (existing), you must conduct an initial performance tune-up, as specified in section 63.11251 of the 40 CFR and tune-ups every 5 years as specified in section 63.11223 of 40 CFR, as specified in section 63.11223 of the 40 CFR.

ii. For boiler EU-33 (new), you must conduct a performance tune-up every 5 years as specified in section 63.11223 of the 40 CFR.

iii. You must submit a signed statement by the Responsible Officer in the Notification of Compliance Status Report that indicates that you conducted a tune-up of the boilers.

d. The standards of Subpart JJJJJJ apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in section 63.11237, during which time you must comply only with Table 2 to subpart JJJJJJ. [Section 63.11201(d) of the 40 CFR]

e. The affected boilers included in this permit shall comply, but not limited to the following requirements, as applicable:

Requirements	Reference
General Compliance Requirements	Section 63.11205(a), (b) and (c) of the 40 CFR.
Initial Compliance Requirements	Section 63.11210, 63.11211, 63.11212, 63.11213 and 63.11214 of the 40 CFR.
Notification, reporting, and recordkeeping requirements	Section 63.11225 of the 40 CFR.
Other requirements	Section 63.11220, 63.11221, 63.11222, 63.11223, 63.11224 and 63.11226 of the 40 CFR.

f. You must comply with each operating limit specified in Table 3 of Subpart JJJJJJ that applies to the affected boilers and included in this permit. [Section 63.11201(c) of the 40 CFR]

g. The permittee shall comply with the applicable General Provisions in sections 63.1 through section 63.16, which are included in Table 8 of Subpart JJJJJJ of the 40 CFR.

D. EU-16, EU-17, EU-18, EU-25 – Internal Combustion Engines: Three Emergency Electric Generators and a Fire Pump

Condition	Parameter	Value	Units	Test method	Method Frequency	Recordkeeping Requirements	Reports Frequency
Hours of Operation Limit	Hours of Operation	500 (EU-16, EU-17 and EU-18) 250 (EU-25)	hours per year, each one	Hours Meter	Continuous	Records	Monthly Annual
Visible Emissions Limit	Opacity	20	percent	Method 9	Stack Test during the first year of this permit	Test Results	60 days after the test
Fuel Sulfur Content Limit	Sulfur Content	0.5 (EU-16, EU-17 and EU-18) 0.05 (EU-25)	Weight Percent	Fuel Supplier Certification	With each fuel receipt	Records of the fuel sulfur content with each receipt	Monthly
Particulate Matter Emission Limit	PM	0.3	lb/MMBtu	Manufacturer Emission Factor or Stack Test using Method 5 of the Appendix A, 40 CFR Part 60, during the first year of the permit	60 days after the permit approval Once during the first year of the permit	Records of the emission factor of each unit Keep a copy of the final report for a period of five years	60 days after the permit approval Sixty days after the stack test of each unit
40 CFR Part 63 Subpart ZZZZ	See condition 5 in this section	---	---	---	---	---	---

1. Hours of Operation Limit

a. The maximum operating hours of the generators in the emission units EU-16, EU-17 and EU-18 is 500 hours/year, each, according to the permit PG-GE-70-111-1357-RC. The maximum hours of operation of the fire pump is 250 hours/year, according to the permit PFE-LC-70-0106-0026-I-II-O.

b. In order to maintain the emergency use category as specified in 40 CFR Part 63 Subpart ZZZZ, each engine is authorized to operate for a maximum of 100 hours per calendar year for any of the combination of the purposes specified in 40 CFR §63.6640(f)(2)(i) through (iii), and up to 50 hours of operation in non-emergency situations, as specified in 40 CFR 63.6640(f)(4). The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in section 63.6640(f)(2) of the 40 CFR, whereas these 100 hours of operation shall be counted as part of the hours of operation limited in the previous condition.

c. Each generator and the fire pump shall be provided with a non-resettable hour meter such that the hours of operation and the fuel consumption can be verified.

d. Holsum shall keep a daily record with the hours of operation, the reason for operation (purpose of operation: emergency, maintenance, etc.). The hours recorded in the hour meter shall be used to calculate the cumulative consumption in a monthly basis. The fuel consumption calculation during each period of 12 consecutive months shall be calculated by adding the monthly fuel consumption in each month. It shall be available at all times for review by EQB's technical personnel.

e. The permittee shall submit semiannually a summary of the monthly hours of operation with the semiannual report required by condition III.14 of this permit

f. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application.

2. Visible Emissions Limit

a. Holsum shall not exceed the opacity limit of 20%, in a 6 minutes average for the units EU-16, EU-17, EU-18 and EU-25. However, the permittee may discharge visible emissions with an opacity of 60% for a period no longer than 4 minutes in any consecutive 30 minutes. [Rule 403 of the RCAP]

b. Holsum shall hire an independent opacity reader, certified in a school approved or endorsed by the EPA or the EQB to make one opacity reading on the chimney stack of each engine during the first year of the permit using Method 9 described in Appendix A of 40 CFR Part 60. The equipment shall be operating at the time of the opacity reading.

c. Holsum shall submit to the Board at least 30 days prior to the initial opacity reading a copy of the format to be used to record the visible emissions readings.

d. Holsum shall provide the Board at least 15 days of prior written notification of the initial test using Method 9, to afford the EQB the opportunity to have an observer present [Rule 106(D) of the RCAP]

e. Holsum shall submit 2 copies of the initial sampling results report under Method 9 within 60 days after the tests. This report shall contain the information required under Rule 106(E) of the RCAP.

f. Holsum shall submit a summary with the test results in the semiannual report and the annual compliance certification corresponding to the period when the tests were conducted.

g. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a

period of 5 years from the date of the monitoring, sample, measurement, report or application.

3. Fuel Sulfur Content Limit

a. The sulfur content of the diesel fuel used in the generators shall not exceed 0.5% weight, unless they become subject to the provisions in §63.6604(b), in which case you must use diesel fuel that meets the requirements in 40 CFR §80.510(b). The sulfur content in the fuel used in the fire pump shall not exceed 0.05% weight. [PG-GE-70-111-1357-RC and PFE-LC-70-0106-0026-I-II-O]

b. Holsum shall keep a copy of the diesel fuel supplier certification each time the fuel is received in the facility. Such certification shall indicate the sulfur content in the fuel, to demonstrate compliance with the previous condition.

c. Holsum shall submit a report every six months indicating on a monthly basis the sulfur content (weight percent) in the fuel burned and the amount of fuel burned in the generators. This report shall be sent to the Data Validation and Mathematical Modeling Division of the Air Quality Area of the EQB no later than the next 15 days from the end of each period of six calendar months for which the report is representative. The report that covers the period from January to June shall be submitted no later than July 15 of the same year and the report that covers the period from July to December shall be submitted no later than January 15 of the next year. A copy of this report must be kept at the facility for inspection by EQB's technical personnel.

d. Holsum shall submit a summary with the information included in these reports in the annual compliance certification.

e. In the event that the internal combustion engines in the emission units EU-16, EU-17, EU-18 and EU-25 are modified or reconstructed, they shall comply with the applicable requirements in the 40 CFR, Part 60, Subpart IIII and apply for a revision to their construction permit. This could imply stricter limits in the sulfur content in the fuel.

f. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application. This includes records of the monthly fuel reports and the sulfur content in the fuel burned.

4. Particulate Matter Emission Limit

a. Holsum shall not cause or permit the emission, from any fuel burning equipment burning solid or liquid fuel, of particulate matter in excess of 0.3 lb/MMBtu of heat input. [Rule 406 of the RCAP]

b. Holsum shall demonstrate within 60 days after the permit approval that the emission factor developed by the manufacturer is below the particulate matter emission limit for each unit or shall conduct an initial performance test to determine compliance with the previous condition using Method 5 described in the 40 CFR Part 60, Appendix A, during the first year of the permit.

c. If compliance is not demonstrated with the manufacturer emission factor, Holsum shall submit for EQB approval, a test protocol at least 30 days prior to the start of the test. This protocol shall contain the information described in Rule 106(C) of the RCAP.

i. Holsum shall provide the Board at least 15 days of prior written notification of the test under Method 9 to afford the EQB the opportunity to have an observer present. [Rule 106(D) of the RCAP]

ii. Holsum shall submit 2 copies of the initial test reports under Method 9 within 60 days after the performance of the tests. This report shall have the information required by Rule 106(E) of the RCAP.

iii. During the test, the source must be operated at its maximum rated capacity or based on representative performance of the affected facility; understanding that, after proving compliance with any applicable emission limit, the Board may restrict the

operation of the source at the capacity reached during the performance test. [Rule 106 (F) of the RCAP]

d. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application.

5. National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63 Subpart ZZZZ) [EU-16, EU-17, EU-18 and EU-25]

1. The internal combustion engines in the units EU-16, EU-17, EU-18 and EU-25 are affected by the Title 40 of the Code of Federal Regulations (40 CFR), Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP), as defined in section 63.6585(a) of the 40 CFR. You shall comply with the applicable requirements of such regulation on or before May 3, 2013.

2. According to Table 2d of Subpart ZZZZ, you shall:

   a. Change oil and filter every 500 hours of operation or annually, whichever comes first;

      i. You have the option to utilize an oil analysis program as described in §63.6625(i) or (j) of the 40 CFR in order to extend the specified oil change requirement in Table 2d of Subpart ZZZZ.

   b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

3. According to the 40 CFR § 63.6625, you shall:

   a. operate and maintain the engine and the control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

   b. install a non-resettable hour meter if one is not already installed.

   c. minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

4. According to the 40 CFR §63.6605 you must operate the engine in a manner for minimizing emissions.

5. According to the 40 CFR §63.6640 you must operate and continuously comply with the emissions and operating limitations and work or management practices contained in Table 6 of the Subpart.

6. In order to maintain the emergency engine category, you must comply with the use and operation limitations contained in the 40 CFR §63.6640(f). If you do not operate the engine according to such requirements, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

7. You shall keep the applicable records according to the 40 CFR §63.6655(f).

   a. you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter.

b. You must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

c. If the engine is used for the purposes specified in the 40 CFR §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), you must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

8. The permittee must comply with the applicable general provisions in sections 63.1 through 63.15, which are included in Table 8 of Subpart ZZZZ of the 40 CFR.

E. Packaging Coders Cleaning

Condition	Parameter	Value	Units	Test method	Method Frequency	Recordkeeping Requirements	Reports Frequency
Methyl ethyl ketone usage limit	Methyl ethyl ketone (MEK)	250	liters/week	Usage	Weekly	Records	Semiannual Annual

1. Methyl Ethyl Ketone (MEK) Usage Limit

a. The amount of MEK used in the maintenance workshop for the packaging coders cleaning shall not exceed 250 liters/week. [PFE-70-1110-0621-I-II-C]

b. The emissions from the packaging coders cleaning shall be controlled by an activated carbon filter, with a minimum efficiency of 60% for MEK.

c. Holsum shall establish the maximum time interval between the replacements of the activated carbon filter, based on the conditions anticipated under the worst case scenario. Holsum shall ensure that the filter is replaced before it gets saturated with MEK.

d. Holsum shall keep records with the following information, available for inspection to EQB's technical personnel:

i. Replacement date of the activated carbon filter.

ii. Amount of MEK used weekly.

e. According to Rule 603(A)(4)(ii) of the RCAP, the permittee shall keep records of all required monitoring data and support information for a period of 5 years from the date of the monitoring, sample, measurement, report or application.

F. 30,000 gallons Propane Tank

1. Holsum shall have available a Preventive Maintenance Program for the propane gas storage tank. This program shall include inspection to the transfer lines, tank safety valves, the frequency by which these activities are performed, and any other information relevant to the maintenance. [PFE-70-1110-0621-I-II-C]

2. Holsum shall give preventive maintenance to the propane gas transfer lines and the safety valves of the tanks according to the preventive maintenance program. Holsum shall keep records of the preventive maintenance performed. It shall be available for inspection by EQB's technical personnel. [PFE-70-1110-0621-I-II-C]

3. Holsum shall keep records indicating the date and the amount of propane gas fed to the tank. This record shall be available for inspection to EQB's technical personnel.

2. Holsum shall keep records with the propane gas purchase receipts, for a period of at least 5 years. This records shall be available for inspection by EQB's technical personnel.

Section VI – Insignificant Emission Units

1. **Holsum** provided the following list of insignificant activities for a better understanding of its operations and equipment layout. Since there is no requirement to update this list, activities may have changed since the time it was submitted, however **Holsum** shall include the list of insignificant activities that are exempted

because of size or production rate. Only the exempt activities and those emission sources that require and have a construction permit under Rule 203 of the RCAP are included. The following activities are considered insignificant if **Holsum** meets the descriptions below.

Emission unit ID	Capacity	Description (Basis for Exemption)
EU -1, EU-2, EU-3 and EU-5: Flour Storage Silos	150,000 lbs of flour, each. They will store a total of 48,784.996 lbs/year of flour, maximum.	Appendix B, 3.ii.(P) (Emit less than 2 ton/year of PM)
EU-4: Flour Storage Silo	150,000 lbs of flour. It will store a maximum of 1,250,000 lbs/year of flour	Appendix B, 3.ii.(P) (Emit less than 2 ton/year of PM)
EU-13, EU-14, EU-15: 3 Room extractors for the bread and buns preparation area	48,784,996 lbs/year maximum of flour processed in the area. They possess 0.01µm filters.	Appendix B, 3.ii.(P) (Emits less than 2 ton/year of PM)
Diesel Storage Tanks EU-19 EU-20 EU-21 EU-22 EU-26 EU-28	 6,000 gallons 6,000 gallons 10,000 gallons 10000 gallons 300 gallons 1,\]000 gallons	Rule 206(F)(3) of the RCAP Appendix B, Section 3.ii.(N), Appendix B, 3.ii.(P)
EU-24: Propane Storage Tank	30,000 gallons	Appendix B, 3.ii.(P) (Emits less than 2 ton/year of VOC)

Emission unit ID	Capacity	Description (Basis for Exemption)
EU-31: Bread and Buns Weighing Room	The room processes flour at a maximum rate of 41,300 ton/year. They are equipped with 0.01µm filters.	Appendix B, 3.ii.(P) (Emits less than 2 ton/year of PM)
EU-32: Cookies and Cakes Ingredients Room	The room processes flour at a maximum rate of 41,300 ton/year. Equipped with 0.01µm filters.	Appendix B. 3.ii.(P) (Emits less than 2 ton/year of PM)
EU-33: Trays Washing System	Uses 660 gal/year of Klendaze Principal	Appendix B. 1 (Has no applicable requirements)

Section VII - Permit Shield

A. In accordance with Rule 603(D) of the RCAP, compliance with permit conditions shall be deemed as compliance with any requirement applicable at the date of issuance, provided that this requirement is included and specifically identified in the permit. Similarly, it is considered in compliance with any requirement specifically identified as "Not Applicable" in the permit.

B. Non-Applicable Requirements

Non-Applicable Requirement	Regulation	Fundament
EU-06, EU-07, EU-08, EU-09, EU-10, EU-11, EU-12		
Fuel Burning Equipment	State Rule 406 of the RCAP	Not applicable to equipment burning gaseous fuel

Non-Applicable Requirement	Regulation	Fundament
EU-16, EU-17, EU-18 and EU-19		
New Source Performance Standards: Stationary Compression Ignition Internal Combustion Engines	**Federal** 40 CFR, Part 60, subpart IIII	The engines of the emission units were manufactured before April 1, 2006.
EU-27, EU-33		
New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units	**Federal** 40 CFR Part 60 Subpart Db	Does not apply because the boilers do not have a heat input capacity from fuels combusted in the steam generating unit greater than 100 million Btu/hr, according to §60.40b of the 40 CFR. The boilers have a capacity of 0.50 MMBtu/hr and 1.02 MMBtu/hr.
New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units	**Federal** 40 CFR Part 60 Subpart Dc	Does not apply because the boilers do not have a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr, according to §60.40c of the 40 CFR. The boilers at Holsum are less than 10 MMBtu/hr. (0.50 MMBtu/hr and 1.02 MMBtu/hr
National Emission Standards for Hazardous Air Pollutants for Major Sources Industrial/Commercial/Institutional Boilers and Process Heaters	**Federal** 40 CFR Part 63 Subpart DDDDD	Does not apply because the boilers are not located at a major source of hazardous air pollutants, according to §63.7485 of the 40 CFR.

Section VIII – Permit Approval

By virtue of the authority conferred upon the Environmental Quality Board by the Environmental Public Policy Act, Law No. 416 of September 22, 2004, as amended, and after verifying the administrative record and compliance with the Uniform Administrative Procedure Law, Law No. 170 of August 12, 1988, as amended, the Clean Air Act, Environmental Public Policy Act and the Regulation for the Control of Atmospheric Pollution of Puerto Rico, the Environmental Quality Board approves the permit subject to the terms and conditions herein established.

In San Juan, Puerto Rico, today October 2, 2015.

ENVIRONMENTAL QUALITY BOARD

Suzette M. Meléndez Colón
Vice President

Rebeca Acosta Pérez
Associate Member

Weldin F. Ortiz Franco
President

APPENDIXES

Appendix I - Definitions and Abbreviations

I. Definitions:

1. **Act** - Clean Air Act, as amended, *42 U.S.7401, et seq.*
2. **Administrator** - Administrator of the Federal Environmental Protection Agency and its authorized representative or the Administrator of a State Agency for Air Pollution Control.
3. **Responsible Officer** - See the definition of Responsible Officer as established under the Regulation for the Control of Atmospheric Pollution of the Environmental Quality Board (1995).
4. **Regulation** - Regulation for the Control of Atmospheric Pollution of the Environmental Quality Board.
5. **Permittee** - Person and/or entity to which the Environmental Quality Board of Puerto Rico has issued an Operating Permit for an Emission Source covered under Title V.
6. **Title V** - Title V of the Federal Clean Air Act (*42 U.S.C. 7661*).

II. Abbreviations

1. **Btu** – British Thermal Unit
2. **CAM** – Compliance Assurance Monitoring
3. **CFR** – Code of Federal Regulations
4. **CO** - Carbon monoxide
5. **CO_2e** – Carbon dioxide equivalent
6. **cyl** – cylinder
7. **EP**- Emission Point
8. **EPA**-Environmental Protection Agency
9. **EU** – Emission unit
10. **gal** - gallons

11. **hr** - hour
12. **EQB** - Environmental Quality Board
13. **gph** – gallons per hour
14. **HAP** –Hazardous Air Pollutants
15. **hp** – horsepower
16. **l** - liter
17. **lb** – pounds
18. **MEK** – methyl ethyl ketone
19. **MMBtu** – Millions Btu
20. **NAAQS, o NNCAA** – National Ambient Air Quality Standards
21. **NO_x** –Nitrogen Oxides
22. **PM** – particulate matter
23. **PM_{10}**- Particulate matter with a size less than or equal to 10 micrometers in aerodynamic mass
24. **ppm** - parts per million
25. **ppm_v** – parts per million per volume
26. **ppm_{vd}** – parts per million per volume, dry basis
27. **RCAP**-Regulations for the Control of Atmospheric Pollution
28. **RI** – Interpretative Resolution
29. **RICE** –Reciprocating Internal Combustion Engine
30. **SBL**- Special Buns Line
31. **SIC**- Standard Industrial Classification
32. **SO_2** – Sulfur Dioxide
33. **ton** - ton
34. **tpy** – tons per year
35. **VOC**-Volatile Organic Compound
36. **wt** - weight

COMMONWEALTH OF
PUERTO RICO
Environmental Quality Board

STATEMENT OF BASIS – TITLE V FINAL PERMIT
HOLSUM DE PUERTO RICO, INC.
PFE-TV-2051-70-0611-0368

The Environmental Quality Board (EQB) is issuing a final Title V permit according to the Title 40 of the Code of Federal Regulations (CFR), Part 70 and Part VI of the Regulations for the Control of Atmospheric Pollution (RCAP) for Holsum de Puerto Rico, Inc. (Holsum). The facility is located in Road #2 Km. 20.6 of the Candelaria Ward in Toa Baja, Puerto Rico. The EQB received a Title V permit on June 13, 2011.

Holsum is a commercial bakery and a significant producer and supplier of bread and sweet goods, among which are various breads and rolls, cookies and sweet goods (donuts, cakes, pies, etc.). The facility is divided into two plants, the bread and buns plant, and the cookies and sweet and goods plant. The manufacturing process for all these products is basically the same, it consists of mixing the ingredients, baking, packaging and distribution. Bulk quantities of flour are shipped to the facility in tank trucks and conveyed into one of the five storage silos. These silos utilize filters to minimize loss of flour during loading. The flour is weighed and mixed with sugar, yeast, water, and other miscellaneous ingredients. Sugar is shipped in bulk liquid form by tank trucks.

Holsum processes one basic type of dough, sponge dough. Fermentation of yeast products begins immediately following the initial mixing of ingredients and continues until the yeast is killed in the oven. Fermentation causes sugars and starches to be converted to ethanol, carbon dioxide and water. At the start of the fermentation, a skin forms on the top of the dough. The skin keeps the ethanol and carbon dioxide in the dough, until it breaks during the baking process. The dough is allowed to rise at a high temperature, high humidity "proof box". Steam required for the proof box environment is supplied by internal electric equipment. Baking with yeast occurs in three ovens (EU-06, EU-07 and EU-08) and involves the expansion of the breads and buns to final volumes, crust formation, yeast and enzymatic activity inactivation, coagulation of the dough proteins, partial gelatinization of the starch, and reduction of bread moisture. The ovens generate emissions from both the combustion of propane gas and the off-gassing of the bread itself. Finally these products are packaged and distributed around the island.

Holsum is required to obtain a Title V permit because it has the potential to emit more than 100 tons of volatile organic compounds (VOC). Holsum is a minor source of hazardous air pollutants and greenhouse gases (GHG's) expressed as CO_2e.

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Emission Units

The Emission Units section lists the significant emission units, the associated control equipment, if any, and the type of fuel. This section is a general description of the facility. The emission units are as follows:

EU-06: Bread manufacturing oven – Has a capacity of 2.2 MMBtu/hr. Consumes 24.3 gph of propane. It is used to bake breads that use yeast during its manufacturing. It is subject to a Compliance Plan because its VOC emissions exceed 3 lbs/hr and 15 lbs/day, contrary to the provisions of Rule 419 of the RCAP. It does not have a control equipment.

EU-07: Buns Manufacturing Oven – Has a capacity of 2.2 MMBtu/hr. Consumes 24.3 gph of propane. It is used to bake buns that use yeast during its manufacturing. It is subject to a Compliance Plan because its VOC emissions exceed 3 lbs/hr and 15 lbs/day, contrary to the provisions of Rule 419 of the RCAP. It does not have a control equipment.

EU-08: SBL Oven (Special Buns Line) – Has a capacity of 5.103 MMBtu/hr. Consumes 56.4 gph of propane. Among the products baked in this oven, there could be used buns with yeast, which generates VOC emissions. It does not have a control equipment.

EU-09: Cakes Manufacturing Oven – Has a capacity of 3.4 MMBtu/hr. Consumes 37.6 gph of propane. It does not have a control equipment.

EU-10: Cookies Manufacturing Oven (80 feet) – Has a capacity of 1.52 MMBtu/hr. Consumes 16.8 gph of propane. It does not have a control equipment.

EU-11: Cookies Manufacturing Oven (100 feet) – Has a capacity of 2.56 MMBtu/hr. Consumes 28.3 gph of propane. It does not have a control equipment.

EU-12: Doughnut Fryer – Has a capacity of 1.245 MMBtu/hr. Consumes 13.8 gph of propane. It does not have a control equipment

EU-16: Emergency Electric Generator– It has a compression internal combustion engine with a capacity of 1006 hp. It consumes diesel at a rate of 54.7 gal/hr. Make: Cummins ONAN. Model: 750 KWDFHA, It is authorized to operate a maximum of 500 hours/year. It does not have a control equipment.

EU-17: Emergency Electric Generator - It has a compression internal combustion engine with a capacity of 1206 hp. Consumes diesel at a rate of 57 gal/hr. Make: Cummins ONAN, Model: 900

KTA38-G3. It is authorized to operate a maximum of 500 hours/year. It does not have a control equipment.

EU-18: Emergency Electric Generator – It has a compression internal combustion engine with a capacity of 1206 hp. Consumes diesel at a rate of 57 gal/hr. Make: Cummins ONAN, Model: 900 KTA38-G3. It is authorized to operate a maximum of 500 hours/year. It does not have a control equipment.

EU-25: Fire Pump – It has a compression internal combustion engine with a capacity of 87 hp. Consumes diesel at a rate of 40 gal/hr. Make: Cummins FIRE PUMP. Model: 5LRG16. It is authorized to operate a maximum of 250 hours/year. It does not have a control equipment.

EU-27: Boiler– This boiler has a capacity of 15 hp. It consumes diesel at a rate of 4.5 gal/hr. It is authorized to operate a maximum of 7,904 hours/year. It does not have a control equipment.

EU-30: Packaging Coders Cleaning- Uses 250 liters/week of methyl ethyl ketone. It has an activated carbon filter with an efficiency of 60%.

EU-33: Boiler – This boiler has a capacity of 26.7 hp. It consumes diesel at a rate of 7.8 gal/hr. It has a fuel limit of 68,140.8 gal/year. It does not have a control equipment. This boiler is not installed at the issuance date of the draft permit.

Allowable Emissions

The emissions described in the following table represent the allowable emissions of the facility at the time of the permit application and shall be used for fee purposes only. According to Rule 610(a) of the RCAP, when Holsum applies for a modification, administrative change or minor modification to the Title V permit, the source will pay only those charges related with any emission increase (if any) per tonnage, based on the change and not based on the total fees paid previously. The allowable emissions are based on the potential emissions in their construction permits.

Pollutants	Emissions (tons/year)
PM	1.42
PM_{10}	0.97
SO_2	2.13
NO_x	26.75
CO	7.46
VOC	250.57
CO_2e	9511.54

According to the Resolution RI-06-02[1] of the EQB, for the annual certification, the emissions calculations will be based in Holsum's actual emissions; however, emissions calculations based on potential emissions will be accepted. If Holsum decides to perform the calculations based on potential emissions, Holsum shall pay the same charge per ton as the facilities that decide to do the calculations based on actual emissions.

Applicable Requirements

National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines - 40 CRF Part 63 Subpart ZZZZ

This subpart applies to any existing, new or reconstructed stationary reciprocating internal combustion engine, located in area sources or major sources of hazardous air pollutants. Holsum is an area source of hazardous air pollutants. The engines in the units EU-16, EU-17, EU-18 and EU-25 are considered existing. The four engines are authorized as emergency engines in their construction permits and under this subpart. In order to maintain the emergency use category as specified in 40 CFR Part 63 Subpart ZZZZ, each engine is authorized to operate for a maximum of 100 hours per calendar year for any of the combination of the purposes specified in 40 CFR §63.6640(f)(2)(i) through (iii), and up to 50 hours of operation in non-emergency situations, as specified in 40 CFR 63.6640(f)(4). The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in section 63.6640(f)(2) of the 40 CFR, whereas these 100 hours of operation shall be counted as part of the hours of operation limited in the permit. The requirements under this regulation vary between changes in oil and filters, and hose and belts inspections.

National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers in Area Sources (40 CFR Part 63 Subpart JJJJJJ)

This subpart applies to boilers, new or existing, located in area sources of hazardous air pollutants. Holsum is an area source of hazardous air pollutants. Boiler EU-27, is considered existing, while Boiler EU-33 is considered new. The requirements under this regulation, for boilers with a capacity less than 5 MMBtu/hr consist of work practices, which require an initial tune-up for the existing boiler and tune-ups every 5 years for both boilers.

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[1] [1]EQB Resolution - Payment procedure for Title V operating charges and Title V permit renewal charges, issued on March 20, 2006.

Prevention of Significant Deterioration- 40 CFR Part 52

The requirements of this regulation apply to the construction of any new major stationary source (as defined in 40 CFR §52.21 (b)(1)) or any project at an existing major stationary source in an area designated as attainment or unclassifiable under sections 107(d)(1)(A)(ii) or (iii) of the Clean Air Act. The VOC emissions at Holsum classify the facility as an existing major stationary source, therefore, any future physical change or any change in the method of operation will need to undergo PSD applicability review.

The following requirements are not applicable to Holsum:

- Fuel burning equipment, **EU-06, EU-07, EU-08, EU-09, EU-10, EU-11, EU-12** – Rule 406 of the RCAP does not apply to equipment than burns gas fuel. The ovens use propane as fuel.

- **New Source Performance Standards: Stationary Compression Ignition Internal Combustion Engines (40 CRF, part 60, subpart IIII), Units EU-16, EU-17, EU-18 y EU-19** – The engines of the emergency generators and the fire pump were manufactured before April 1, 2006.

- **New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units** (40 CFR Part 60 Subpart Db), Units **EU-27, EU-33** - Does not apply because the boilers do not have a heat input capacity from fuels combusted in the steam generating unit greater than 100 million Btu/hr, according to §60.40b of the 40 CFR. The boilers have a capacity of 0.50 MMBtu/hr and 1.02 MMBtu/hr, respectively.

- New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60 Subpart Dc) - Does not apply because the boilers do not have a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr, according to §60.40c of the 40 CFR. The boilers at Holsum are less than 10 MMBtu/hr. (0.50 MMBtu/hr and 1.02 MMBtu/hr, respectively)

- **National Emission Standards for Hazardous Air Pollutants for Major Sources Industrial/Commercial/Institutional Boilers and Process Heaters** (40 CFR Part 63 Subpart DDDDD) - Does not apply because the boilers are not located at a major source of hazardous air pollutants, according to §63.7485 of the 40 CFR.

The frequency of reporting for compliance certification for this source should be annual. However, Holsum shall submit semiannual reports of any required monitoring. Unless specifically stated, all terms and conditions of the Title V permit, including provisions designed to limit the potential emission of the source, are enforceable by EPA and the citizens under the Federal Clean Air Act. The terms and conditions designated as state enforceable only, as indicated by the permit, are enforceable only by the EQB.

The public hearing for the draft permit was celebrated on December 5, 2013. In the hearing, Holsum submitted a document in which it requested the suspension of the procedures related to the Title V operating permit application since, according to the results of a stack test that was performed recently in the emission units, they allegedly reflected that the potential emissions are below the threshold (100 tons per year for VOC) of the Regulations for the Control of Atmospheric Pollution, so the facility alleged that it should not be subject to the requirements of Part VI of the RCAP for sources covered by the Title V Program. The application was declared admissible by the Governing Board of the EQB. Following this request, on May 8, 2014, a hearing with the Examiner Officer was celebrated under the parameters set by the Governing Board of the EQB in its resolution and notification of March 24, 2014 (R-14-9 -1). After the presentation of the positions from both parts (Holsum and EQB), the Examiner Officer who presided the hearing, in its report on May 21, 2014, determined that Holsum should be considered a major source because it has the potential to emit more than a hundred tons of VOC and recommended the approval of the proposed Title V permit of Holsum, that will be sent to the EPA for a review period of 45 days. This report was approved by the Governing Board by Resolution issued on July 15, 2014 and notified on August 27, 2014. Also, the Governing Board denied an Urgent Motion and Request of Remedy that was presented by Holsum on May 21, 2014.

The EQB has determined that this Title V Operating Permit satisfies the requirements under RCAP Part VI.