

Puget Sound Air Pollution Control Agency

110 Union Street, Suite 500, Seattle, WA 98101-2038: David Lenington (206) 689-4061

Emission Statement

August 26, 1997

GAI'S SEATTLE FRENCH BAKING CO

File #: 10873

EPA AFS #: 033-0873

Location (KING County):

2006 S WELLER ST
 SEATTLE, WA 98144
 D WINGLE/JOE BURNS
 PLANT ENGINEER/CHIEF ENGINEER
 (206) 322-0931

Mailing Address:

PO BOX 24327
 SEATTLE, WA 98124-0327
 DONALD GAI
 DIRECTOR OF OPERATIONS
 (206) 329-3000

Standard Industrial Classification: 2051 BREAD AND OTHER BAKERY PRODUCTS

Air Contaminant Emission Summary

<u>CAS#</u>	<u>Flags</u>	<u>Air Contaminants:</u>	<u>pounds/1995</u>	<u>pounds/1996</u>
64-17-5	VT	Ethyl alcohol (Ethanol)	<u>198,411</u>	<u>191,320</u>
		Volatile Organic Compounds Total (V)	198,411 (99 tons)	191,320 (96 tons)
		Toxic Air Contaminants Total (T)	198,411 (99 tons)	191,320 (96 tons)

Emission Point/Segment Summary

Point 001 BREAD MAKING
 Segment 01 SPONGE DOUGH
 Segment 02 STRAIGHT RUN



PSAPCA JUL 18 1997

PRESTON GATES & ELLIS LLP
ATTORNEYS

July 17, 1997

DL 7/18
David Lennington
Air Operating Permit Program
Puget Sound Air Pollution Control Agency
110 Union Street, # 500
Seattle, WA 98101

Re: Gai's Seattle French Baking Company

Dear Dave:

On behalf of Gai's I am submitting the following comments on the draft operating permit for Gai's Seattle French Baking Company.

Draft Air Operating Permit

Page 17, Section II.D and E

Do these sections refer to insignificant emission units under the operating permit rule? If so, it may not be appropriate for the permit to add monitoring requirements for them. The rule states that "[t]he permit shall not require testing, monitoring, reporting or recordkeeping for insignificant emission units or activities, except where generally applicable requirements of the state implementation plan specifically impose these requirements." WAC 173-401-530(2)(c). Unless the requirements in these sections (follow a fuel sulfur monitoring plan and burn only natural gas) are SIP requirements, there is no authority to impose them through the operating permit if the units that PSAPCA intends them to apply to are insignificant emission units.

Page 29, Section X

Gai's Seattle French Baking Company does not have more than a threshold quantity of any of the regulated substances listed in 40 CFR Part 68, and therefore

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PSAPCA AUG 12 1997

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

AUG 11 1997

Reply To
Attn Of: OAQ-107

Mr. David Lenington *WJ sh*
Air Operating Permit Program
Puget Sound Air Pollution Control Agency
110 Union Street, #500
Seattle, Washington 98101

Dear Mr. Lenington:

Thank you for the opportunity to review the draft air operating permit for Gai's Seattle French Baking Company. The permit was reviewed by me and Elizabeth Waddell, Environmental Scientist, and we received legal advice from Julie Vergeront, Assistant Regional Counsel for the Environmental Protection Agency (EPA). The permit looks very good, and I have the following comments:

1. In Section I, A and B (1), (2), and (3), under the column for "Emission Standard Reference Test Method", the test method must be more fully identified. Two examples are: Ecology Method 9A, "Source Test Manual - Procedures for Compliance Testing", State of Washington, Department of Ecology, July 12, 1990, and EPA Method 8, 40 CFR Part 60, Appendix A, July 1993.

2. In Section V, O. Recordkeeping, c), In the first sentence: "...for a period of five years from the date of the monitoring, sample, measurement, record or application", according to the citation it is really: "... for a period of five years from the date of the monitoring sample, measurement, report, or application".

If you have any questions or wish to discuss a comment further, please feel free to call me at (206) 553-6917.

Sincerely,

Lisa Jacobsen
Environmental Engineer

is not subject to this provision. Gai's will sign any certification statement that PSAPCA requires regarding the risk management program.

Fact Sheet

Page 2, Source Description

A minor point for factual clarity -- only a few of the heaters used by Gai's uses diesel backup. Please add the following underlined phrase to the first full paragraph on this page: "Gai's building is heated by natural gas with a few steam heaters using highway grade diesel backup."

Page 4, Figure 1 (Sponge Dough Process)

The arrow pointing from blank space to "Proof" should be deleted and an arrow pointing from "Floor Time" to "Cut" should be added.

Page 8, Figure 1 (Danish/Croissant)

Delete the word "overnight" after the word "retard." The retard process may be carried out during the day.

Page 11, Section I.A, 3rd bullet

Not all ovens at the facility are direct fired. The following sentence, therefore, is not totally accurate: "It does not apply to the ovens because they are direct gas-fired units." As discussed previously, a solution would be to delete this sentence.

Page 15, Section EU-2, 1st bullet

[Same comment as immediately above.]

Emission Statement Attachment

Please make the following change on Emission Statements for Gai's Seattle French Baking Co. -- Donald Gai's title is "Director of Operations" not "Vice President."

• Dave Lennington

July 17, 1997

Page 3

Gai's Baking Company appreciates the opportunity to provide these comments. Please call if you have any questions about them.

Very truly yours,

PRESTON GATES & ELLIS LLP

By



Kirk A. Lilley

cc: Dan Wingle



August 26, 1997

Kirk Lilley
Preston Gates & Ellis LLP
701 5th Ave, Suite 5000
Seattle, WA 98104-7078

Dear Mr. Lilley:

Comments Regarding Gai's Seattle French Baking Company Draft Operating Permit

Thank you for your additional comments on the Gai's Draft Operating Permit during the public comment period. Here is our reply to your comments:

Draft Air Operating Permit

Page 17, Section II.D and E

These sections refer to the fuel received facility-wide. As such, any fuel burning activity must comply with the standard by these means. But since the fuel source is the same for all units, the records only need to be kept once and in one location. This also negates having to specify what quantity of fuel serves any one applicable unit. We believe these methods do not impose additional or separate monitoring requirements for insignificant emission units.

Page 29, Section X

If Gai's Seattle French Baking Company does not have more than a threshold quantity of any of the substances listed in 40 CFR Part 68, then they need to determine rule applicability and contact PSAPCA. They must specifically state that they are in compliance with or exempt from all the requirements of 40 CFR Part 68, including registration (40 CFR 60.160) and submission of the risk management plan (40 CFR 68.150 to 185). This provision cannot be changed or removed from the permit.

Fact Sheet

Page 2, Source Description

Change made

Page 4, Page 8

Change made

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Charlotte Garrido, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
R.C. "Swede" Johnson, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Norman B. Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive

Kirk Lilley
Preston Gates & Ellis LLP
August 26, 1997
Page 2

Page 11, Page 15

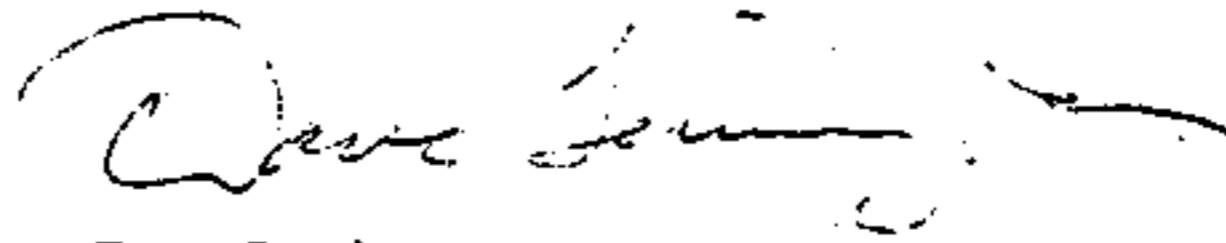
We meant to say: "It does not apply to the direct-fired gas ovens." From our phone conversation on Thursday, August 21, 1997, this appears to serve your purpose.

Emission Statement Attachment

We made the change to Donald Gai's title.

We have incorporated these changes into the Operating Permit and Fact Sheet. These documents are enclosed in their revised form. Again, thanks for your comments. We will send the final versions of each document to Gai's after the EPA comment period is over. Please call if you have any questions.

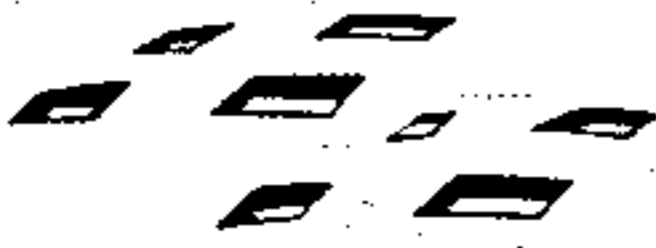
Sincerely,



Dave Lenington
Air Pollution Engineer

DJL:mj
Enclosures

cc: D. S. Kircher
J. M. Willenberg
E. M. Gilpin



Samish Indian Nation
OF WASHINGTON

PSAPCA JUL 08 1997

July 7, 1997

David Lenington
Air Operating Permit Program
PSAPCA
110 Union St., Suite 500
Seattle, WA 98101

AJL 7/6/97

Dear Mr. Lenington:

Inquiring about permit application "Gai's Seattle French Baking Company; 2006 So. Weller St.; Seattle, WA 95144."

Questions:

- A) Please identify the "Volatile organic compounds" being emitted to outside air.
- B) What can be the consequence of "Volatile organic compounds" if a saturation point is made?
- C) What is the majority of direction of exhaust plume? Direction of prevailing winds?
- D) What or who are the recipients of down wind effects?

I await your answer. For your information our E-mail address is: "samish@fidalgo.net."

Sincerely,

Mac C. Oreiro, Jr.

MCO/dmf