December 19, 2012

**CERTIFIED MAIL: 91 7108 2133 3939 2120 4309**

**NOTICE OF FINAL TITLE V AIR OPERATION PERMIT**

In the Matter of an
Application for Permit Revision and Renewal:

William MacKenzie
Plant Manager
Interstate Brands Corporation
2200 South Division Avenue
Orlando, Florida, 32805

FINAL Permit Project No.: 0950364-007-AV
Merita Bakery- Orlando Facility
Orange County

Enclosed is the FINAL Permit, No. 0950364-007-AV, for the Title V Air Operation Permit Revision and Renewal. The purpose is to renew the operation permit and revise it to incorporate modifications authorized by construction permit 0950364-008-AC. The facility is located in Orange County. This permit revision is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Orlando, Florida.

Orange County
Environmental Protection Division

_____
Jodi D. Dittell
Environmental Program Supervisor

(6)JK/NGM/JD:bh

Enclosures

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent by U.S. e-certified mail before the close of business on _____ to the person listed below:

Mr. William MacKenzie, Plant Manager, Merita Bakery - Orlando Facility

The undersigned duly designated deputy agency clerk hereby certifies that a copy of this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent electronically (with Received Receipt requested) before the close of business on _____ to the persons listed below:

Mr. William MacKenzie, Plant Manager, Interstate Brands Corp.: william.mackenzie@hostessbrands.com
Mr. Douglas Bauman, P.E., General Civil & Environmental Engineering LLC: doug4ucf@earthlink.net
Mr. Scott Johnson, Field Environmental Coordinator, Interstate Brands Corp.: scott.johnson@ hostessbrands.com
Ms. Caroline Shine, FDEP Central District: caroline.shine@dep.state.fl.us
Mr. Tom Lubozynski, FDEP Central District: Tom.Lubozynski@dep.state.fl.us
Ms. Ana Oquendo, US EPA Region 4: oquendo.ana@epa.gov
Ms. Natasha Hazziez, EPA Region 4: hazziez.natasha@epa.gov
Ms. Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

# FINAL Determination

## I. Comments.

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit.

## II. Clarifications.

The first page of Section IV, Appendices, was clarified to show that the Appendices are enforceable parts of this permit, but the following are not enforceable parts of this permit: Table H, Permit History; Statement of Basis; Table 1, Summary of Air Pollutant Standards and Terms; Table 2, Compliance Requirements.

## III. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

**Interstate Brands Corporation**
**Merita Bakery- Orlando Facility**

Facility ID No.: 0950364
Orange County

# Title V Air Operation Permit Revision and Renewal

# FINAL Permit No.: 0950364-007-AV


Permitting And Compliance Authority:
Orange County Environmental Protection Division
800 Mercy Drive, Suite 4
Orlando, Florida 32808
Telephone: 407-836-1400
Fax: 407-836-1498

# Title V Air Operation Permit Revision and Renewal

Permit No. 0950364-007-AV

## Table of Contents

**Section** **Page Number**

I. Facility Information.
A. Project and Facility Descriptions. ..... 2
B. Summary of Emissions Units. ..... 2
C. Applicable Regulations. ..... 2

II. Facility-wide Conditions. ..... 4

III. Emissions Units and Specific Conditions.
A. Brief EU Description ..... 6

IV. Appendices. .....
Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.

Referenced Attachments. ..... At End
Table H, Permit History.
Statement of Basis
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.

**PERMITTEE:**
Interstate Brands Corporation
2200 South Division Avenue
Orlando, Florida 32805

Permit No.: 0950364-007-AV
Merita Bakery - Orlando Facility
Facility Id No. 0950364
Title V Air Operation Permit Revision and Renewal

The purpose of this permit is for the revision and renewal of the Title V air operation permit for the above-referenced facility. This air operation permit incorporates the modifications authorized by construction permit 0950364-008-AC that was processed concurrently with the application for this operation permit. The Merita Bakery – Orlando Facility is located in Orange County at 2200 South Division Avenue, Orlando, Florida. Latitude is: 28°31'07" North; and, Longitude is: 81°23'06" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: December 19, 2012
Renewal Application Due Date: May 7, 2017
Expiration Date: December 18, 2017

_____
Jodi D. Dittell
Environmental Program Supervisor

(6) JK/NGM/JD:bh

## SECTION I. FACILITY INFORMATION.

**Subsection A.**

**Project Description.**

This project revises and renews permit 0950364-006-AV, and incorporates modifications authorized by construction permit 0950364-008-AC. This facility description and emission unit summary incorporate the modifications authorized by permit 0950364-008-AC.

**Facility Description.**

This bakery facility makes bread and rolls and packages the product for shipment to retailers. There are three production lines, each with a conveyor oven. Bread Line 1 and Bread Line 2 each consist of a production line for mixing dough, forming and baking products, cooling baked products and packaging for bread loaves. Roll Line 1 consists of a production line for mixing dough, forming and baking products, cooling baked products and packaging for hot dog rolls and similar products. Each production line includes ink-jet printers for printing dates and other product information on individual packages.

Emissions from this facility consist of VOC from the bread baking process (specifically ethanol from yeast fermentation) and miscellaneous VOC from ink-jet printers. All three production lines operate without air pollution control equipment. Bread product production and VOC emissions are limited to avoid exceeding the PSD major source threshold for VOC.

The facility also includes flour silos, natural gas-fired combustion equipment and other emission units and activities that meet the requirements of Rule 62-213.430(6), F.A.C., for insignificant sources.

Based on the Title V air operation permit renewal application received January 18, 2012 this facility is NOT a major source of hazardous air pollutants (HAP).

**Subsection B. Summary of Emissions Units.**

| Facility ID Number 0950364 | |
|---|---|
| **EU ID** | **Emission Unit Description** |
| 003 | Bread Baking Processes<br>Bread Baking Processes emit VOC produced by yeast fermentation. This emission unit consists of the bread baking processes in Bread Line 1, Bread Line 2 and Roll Line 1. Bread Line 1 and Bread Line 2 each consist of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for bread loaves. Roll Line 1 consists of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for hot dog rolls and similar products. |
| 004 | Ink-Jet Printers<br>The facility uses ink-jet printers for printing dates and other product information on individual packages. All production lines use the printers, and there is a total of seventeen ink-jet printers at the facility. This emission unit includes printer inks and all related products containing VOC and HAP. |

**Subsection C. Applicable Regulations.**

| Regulation | EU Numbers |
|---|---|
| 40 CFR Part 61, Subpart M: NESHAP for Asbestos | 003 |
| 40 CFR Part 82: Protection of Stratospheric Ozone | Facility-Wide |
| 40 CFR Part 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC) | Facility-Wide |
| 40 CFR Part 82, Subpart F: Recycling and Emissions Reduction | Facility-Wide |
| 62-4.030 | 003, 004 |

| | |
|---|---|
| 62-4.050 | 003, 004 |
| 62-4.060 | 003, 004 |
| 62-4.070 | 003, 004 |
| 62-4.080 | 003, 004 |
| 62-4.100 | 003, 004 |
| 62-4.090 | 003, 004 |
| 62-4.110 | 003, 004 |
| 62-4.130 | 003, 004 |
| 65-4.160 | 003, 004 |
| 62-210.200 | 003, 004 |
| 62-210.300 | 003, 004 |
| 62-210.350 | 003, 004 |
| 62-210.360 | 003, 004 |
| 62-210.370 | 003, 004 |
| 62-210.400 | 003, 004 |
| 62-210.650 | 003, 004 |
| 62-210.700 | 003, 004 |
| 62-210.900 | 003, 004 |
| 62-212.400 | 003, 004 |
| 62-213.205 | 003, 004 |
| 62-213.400 | 003, 004 |
| 62-213.410 | 003, 004 |
| 62-213.412 | 003, 004 |
| 62-213.415 | 003, 004 |
| 62-213.420 | 003, 004 |
| 62-213.430 | 003, 004 |
| 62-213.440 | 003, 004 |
| 62-213.450 | 003, 004 |
| 62-213.460 | 003, 004 |
| 62-213.900 | 003, 004 |
| 62-296.100 | 003, 004 |
| 62-296.320 | 003, 004 |
| Orange County Code of Ordinances, Chapter 15, Article III, Air Quality Control. | 003, 004 |

**The following conditions apply facility-wide to all emission units and activities:**

**FW.1.** Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

**Emissions and Controls**

**FW.2. Not federally Enforceable.** Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

**FW.3.** General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPD. To comply, procedures to minimize pollutant emissions shall include the following:

a. Tightly cover or close all VOC containers when they are not in use;
b. Maintain all piping, valves, fittings, etc. in good operating condition;
c. Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction permit 0950364-008-AC]

**FW.4.** General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

**FW.5.** Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Paving and maintenance of roads, parking areas and yards.
b. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
c. Use of filters, enclosures and similar equipment to contain, capture and/or vent particulate matter.
d. Enclosure or covering of conveyor systems and loading and offloading areas.

[Rule 62-296.320(4)(c), F.A.C.; Construction permit 0950364-008-AC]

**Annual Reports and Fees**

See Appendix RR, Facility-wide Reporting Requirements for additional details.

**FW.6.** Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

**FW.7.** Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

**FW.8.** Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

**FW.9.** Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

**FW.10. Not Federally Enforceable**. Orange County Ordinances: All air pollution sources located in Orange County are subject to the Orange County Code of Ordinances, including Chapter 15, Article III, Air Quality Control.

**FW.11.** The Merita Bakery-Orlando Facility is subject to 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction. This regulation requires facilities which have bakery industrial process appliances containing 50 pounds or more of Ozone-Depleting Substance (ODS) refrigerants to maintain records of leaks and proof that the leak was repaired within the time limits specified in the regulation. Leaking appliances that cannot be fixed must be replaced or shut down. [40 CFR Part 82, Subpart F – Recycling and Emissions Reduction] {Permitting Note: Facility not subject to the requirement if an acceptable replacement for the refrigerant is used.}

**FW.12.** Natural Gas Consumption. The facility-wide natural gas consumption is limited to no more than 85 million cubic feet per consecutive 12 months. [Construction Permit 0950364-008-AC]

**FW.13.** Bin Vent Filter. The facility shall maintain the bin-vent filter atop the wheat flour silo in good working order. [Construction Permit 0950364-008-AC]

## Subsection A. Emission Units 003 and 004

**The specific conditions in this section apply to the following emissions units.**

| EU ID | Emission Unit Description |
|---|---|
| 003 | Bread Baking Processes<br>Bread Baking Processes emit VOC produced by yeast fermentation. This emission unit consists of the bread baking processes in Bread Line 1, Bread Line 2 and Roll Line 1. Bread Line 1 and Bread Line 2 each consist of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for bread loaves. Roll Line 1 consists of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for hot dog rolls and similar products. |
| 004 | Ink-Jet Printers<br>The facility uses ink-jet printers for printing dates and other product information on individual packages. All production lines use the printers, and there is a total of seventeen ink-jet printers at the facility. This emission unit includes printer inks and all related products containing VOC and HAP. |

### OPERATING RESTRICTIONS

**A.1.** Hours of Operation. The facility is permitted to operate continuously. [Rule 62-210.200, (Potential to Emit), F.A.C., and Construction Permit 0950364-008-AC]

**A.2.** Permitted Capacity. The maximum permitted production rates are:

a. 65.28 million pounds of breads per consecutive twelve months for Bread Line 1;
b. 88.12 million pounds of breads per consecutive twelve months for Bread Line 2;
c. 23.74 million pounds of rolls per consecutive twelve months for Roll Line 1.

[Rule 62-210.200, (Potential to Emit), F.A.C., and Construction Permit 0950364-008-AC]

**A.3.** VOC and Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPD. To comply, procedures to minimize pollutant emissions shall include the following:

a. Tightly cover or close all VOC containers when they are not in use;
b. Maintain all piping, valves, fittings, etc. in good operating condition;
c. Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 0950364-008-AC]

**A.4.** Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Paving and maintenance of roads, parking areas and yards.
b. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
c. Use of filters, enclosures and similar equipment to contain, capture and/or vent particulate matter.
d. Enclosure or covering of conveyor systems and loading and offloading areas.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit 0950364-008-AC]

## EMISSIONS STANDARDS

**A.5.** VOC Emissions. The emissions of volatile organic compounds and organic solvents as defined in Chapter 62-213, F.A.C., from the sources at the facility shall not exceed 230.0 tons per twelve consecutive months. [Rule 62-210.200, (Potential to Emit), F.A.C., and Construction Permit 0950364-008-AC]

## RECORDS AND REPORTS

**A.6.** Emissions Calculations: The VOC emissions (pounds) from bread production shall be calculated by multiplying the amount of bread produced (in tons) by the VOC Emission Factor (pounds VOC per ton of bread produced) calculated from the following equation listed in Compilation of Air Pollutant Emission Factors, AP-42 Section 9.9.6 Bread Baking. The equation can also be found in "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992). The equation is:

VOC E.F. = 0.95Yi+0.195ti-0.51S-0.86ts+1.90

Where:
VOC E.F. = pounds VOC per ton of baked bread
Yi = initial baker's percent of yeast
Ti = total yeast action time in hours
S = final (spike) baker's percent of yeast
ts = spiking time in hours

Where no final (spike) yeast is added, the equation condenses to:
VOC E.F. = 0.95 Yi+0.195ti+1.90

Merita may use the following nomenclature:
Yi = initial baker's percent of yeast (Sponge % Yeast)
Ti = total yeast action time in hours (Ferment + Proof + Floor Time)
S = final (spike) baker's percent of yeast (Dough % Yeast)
ts = spiking time in hours (Proof + Floor Time)
[Rule 62-210.200, (Potential to Emit), F.A.C., and Construction Permit 0950364-008-AC]

**A.7.** Recordkeeping Log. A log shall be kept for this facility to document compliance with conditions **FW12**, **A.2** and **A.5** of this permit. All records shall be maintained onsite in either paper copy or computer-readable format. The log shall be kept on file at the facility for at least five years. The monthly logs shall be completed by the end of the following month. The log shall contain the following:

a. Calendar date for which records are being tabulated;
b. Monthly and consecutive twelve month totals of bread production for each of the three production lines;
c. Monthly and consecutive twelve month totals of VOC emissions from bread production;
d. Monthly and consecutive twelve month totals of ink-jet printer ink and ink-related products used, and ink and ink-related products VOC emissions;
e. Monthly and consecutive twelve month totals of facility-wide VOC emissions;
f. Monthly and consecutive twelve month totals of facility-wide natural gas consumption.

[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C., Construction permit 0950364-008-AC]

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-297.310(8), F.A.C.]

**A.8.** Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

## SECTION IV. APPENDICES.

The following Appendices are enforceable parts of this permit:
Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.

The following are included but are not enforceable parts of this permit:
Table H, Permit History.
Statement of Basis.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.

**Abbreviations and Acronyms:**

**° F**: degrees Fahrenheit

**acfm**: actual cubic feet per minute

**AOR:** Annual Operating Report

**ARMS**: Air Resource Management System (Department's database)

**BACT**: best available control technology

**Btu**: British thermal units

**CAA**: Clean Air Act

**CAAA**: Clean Air Act Amendments of 1990

**CAM**: compliance assurance monitoring

**CEMS**: continuous emissions monitoring system

**Cd**: cadmium

**cfm**: cubic feet per minute

**CFR**: Code of Federal Regulations

**CO**: carbon monoxide

**COMS**: continuous opacity monitoring system

**DARM**: Division of Air Resources Management

**DCA**: Department of Community Affairs

**DEP**: Department of Environmental Protection

**Department**: Department of Environmental Protection

**dscfm**: dry standard cubic feet per minute

**EPA**: Environmental Protection Agency

**ESP**: electrostatic precipitator (control system for reducing particulate matter)

**EU**: emissions unit

**F.A.C.**: Florida Administrative Code

**F.D.**: forced draft

**F.S.**: Florida Statutes

**FGR**: flue gas recirculation

**Fl**: fluoride

**$ft^2$**: square feet

**$ft^3$**: cubic feet

**gpm**: gallons per minute

**gr**: grains

**HAP**: hazardous air pollutant

**Hg**: mercury

**HMIWI**: hospital/medical/infectious waste incinerator

**I.D.**: induced draft

**ID**: identification

**ISO:** International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals pressure.)

**kPa**: kilopascals

**LAT:** Latitude

**lb**: pound

**lbs/hr**: pounds per hour

**LONG:** Longitude

**MACT**: maximum achievable control technology

**mm:** millimeter

**MMBtu**: million British thermal units

**MSDS**: material safety data sheets

**MW**: megawatt

**NESHAP**: National Emissions Standards for Hazardous Air Pollutants

**$NO_X$**: nitrogen oxides

**NSPS**: New Source Performance Standards

**O&M**: operation and maintenance

**$O_2$**: oxygen

**ORIS:** Office of Regulatory Information Systems

**OS:** Organic Solvent

**Pb**: lead

**PM**: particulate matter

**$PM_{10}$**: particulate matter with a mean aerodynamic diameter of 10 microns or less

**PSD**: prevention of significant deterioration

**psi**: pounds per square inch

**PTE**: potential to emit

**RACT**: reasonably available control technology

**RATA**: relative accuracy test audit

**RICE**: Reciprocating internal combustion engines

**RMP:** Risk Management Plan

**RO:** Responsible Official

**SAM**: sulfuric acid mist

**scf**: standard cubic feet

**scfm**: standard cubic feet per minute

**SIC**: standard industrial classification code

**SNCR**: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)

**SOA**: Specific Operating Agreement

**$SO_2$**: sulfur dioxide

**TPH**: tons per hour

**TPY**: tons per year

**UTM**: Universal Transverse Mercator coordinate system

**VE**: visible emissions

**VOC**: volatile organic compounds

**x:** By or times

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**Citations:**

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers and ID numbers.*

Code of Federal Regulations:

*Example*: **[40 CFR 60.334]**

| | | | |
|---|---|---|---|
| Where: | 40 | refers to | Title 40 |
| | CFR | refers to | Code of Federal Regulations |
| | 60 | refers to | Part 60 |
| | 60.334 | refers to | Regulation 60.334 |

Florida Administrative Code (F.A.C.) Rules:

*Example*: **[Rule 62-213.205, F.A.C.]**

| | | | |
|---|---|---|---|
| Where: | 62 | refers to | Title 62 |
| | 62-213 | refers to | Chapter 62-213 |
| | 62-213.205 | refers to | Rule 62-213.205, F.A.C. |

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**Identification Numbers:**

Facility Identification (ID) Number:

*Example*: Facility ID No.: 1050221

*Where:*

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

*Example*: 1050221-002-AV, or
1050221-001-AC

*Where:*

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221= 4-digit number assigned by permit tracking database
001 or 002= 3-digit sequential project number assigned by permit tracking database

*Example*: PSD-FL-185
PA95-01
AC53-208321

*Where:*

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC53 = old Air Construction Permit numbering identifying the facility is located in Polk County

## APPENDIX I-1

## INSIGNIFICANT EMISSION UNITS AND ACTIVITIES

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Four flour silos with bin-vent filters and flour management system, all located indoors
2. Wheat flour silo with bin-vent filter located outdoors
3. Natural gas-fired space heaters
4. Two natural gas fired boilers rated at 2.5 MMBtu/hr each
5. One natural gas fired boiler rated at 8.34 MMBtu/hr
6. Natural gas-fired oven burner for Bread Line 1, rated at 4.58 MMBTU/hr
7. Natural gas-fired oven burner for Bread Line 2, rated at 8.8 MMBTU/hr
8. Natural gas-fired oven burner for Roll Line 1, rated at 4.08 MMBTU/hr
9. Equipment Chain Lubrication
10. Non-halogenated parts washers
11. Firefighting equipment
12. Ground maintenance equipment with general purpose internal combustion engines
13. Welding, brazing, and soldering equipment and operations
14. Asbestos renovation and demolition activities
15. Steam cleaner
16. Refrigeration Equipment
17. Oil and fuel storage tanks
18. Fueling
19. Storage of waste chemicals and solvents
20. Air compressor system
21. HVAC systems
22. Maintenance shop activities
23. Painting (non-spray booth)
24. Applicable items on the EPA list of trivial and insignificant activities

## FACILITY-WIDE REPORTING REQUIREMENTS

(Version Dated 9/17/2009)

**RR1.** Reporting Schedule. This table summarizes information for convenience purposes only. It does not supersede any of the terms or conditions of this permit.

| **Report** | **Reporting Deadline(s)** | **Related Condition(s)** |
|---|---|---|
| Plant Problems/Permit Deviations | Immediately upon occurrence (See RR2.d.) | RR2, RR3 |
| Malfunction Excess Emissions Report | Quarterly (if requested) | RR3 |
| Semi-Annual Monitoring Report | Every 6 months | RR4 |
| Annual Operating Report | April 1 | RR5 |
| Annual Emissions Fee Form and Fee | March 1 | RR6 |
| Annual Statement of Compliance | Within 60 days after the end of each calendar year (or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement); and<br>Within 60 days after submittal of a written agreement for transfer of responsibility, or<br>Within 60 days after permanent shutdown. | RR7 |
| Notification of Administrative Permit Corrections | As needed | RR8 |
| Notification of Startup after Shutdown for More than One Year | Minimum of 60 days prior to the intended startup date or, if emergency startup, as soon as possible after the startup date is ascertained | RR9 |
| Permit Renewal Application | 225 days prior to the expiration date of permit | TV17 |
| Test Reports | Maximum 45 days following compliance tests | TR8 |

*{Permitting Note: See permit Section III. Emissions Units and Specific Conditions, for any additional Emission Unit-specific reporting requirements.}*

**RR2.** Reports of Problems.

a. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the EPD. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with EPD rules.

b. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the EPD with the following information:
   (1) A description of and cause of noncompliance; and
   (2) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the EPD for penalties or for revocation of this permit.

c. When requested by the EPD, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes

aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the EPD, such facts or information shall be corrected promptly.

d. "Immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays; and, for purposes of Rule 62-4.160(15) and 40 CFR 70.6(a)(3)(iii)(B), "promptly" or "prompt" shall have the same meaning as "immediately".

[Rule 62-4.130, Rule 62-4.160(8), Rule 62-4.160(15), and Rule 62-213.440(1)(b), F.A.C.; 40 CFR 70.6(a)(3)(iii)(B)]

**RR3.** Reports of Deviations from Permit Requirements. The permittee shall report in accordance with the requirements of Rule 62-210.700(6), F.A.C. (below), and Rule 62-4.130, F.A.C. (condition RR2.), deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. *Rule 62-210.700(6)*: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the EPD in accordance with Rule 62-4.130, F.A.C. (See condition RR2.). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the EPD.
[Rules 62-213.440(1)(b)3.b., and 62-210.700(6)F.A.C.]

**RR4.** Semi-Annual Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. [Rule 62-213.440(1)(b)3.a., F.A.C.]

**RR5.** Annual Operating Report.

a. The permittee shall submit to the EPD, each calendar year, on or before April 1, a completed DEP Form No 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year.

b. Emissions shall be computed in accordance with the provisions of Rule 62-210.370(2), F.A.C.

[Rules 62-210.370(2) & (3), and 62-213.440(3)(a)2., F.A.C.]

**RR6.** Annual Emissions Fee Form and Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, an annual emissions fee in an amount determined as set forth in Rule 62-213.205(1), F.A.C.

a. If the Department has not received the fee by February 15 of the year following the calendar year for which the fee is calculated, the Department will send the primary responsible official of the Title V source a written warning of the consequences for failing to pay the fee by March 1. If the fee is not postmarked by March 1 of the year due, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee unpaid plus interest on such amount computed in accordance with Section 220.807, F.S. If the Department determines that a submitted fee was inaccurately calculated, the Department shall either refund to the permittee any amount overpaid or notify the permittee of any amount underpaid. The Department shall not impose a penalty or interest on any amount underpaid, provided that the permittee has timely remitted payment of at least 90 percent of the amount determined to be due and remits full payment within 60 days after receipt of notice of the amount underpaid. The Department shall waive the collection of underpayment and shall not refund overpayment of the fee, if the amount is less than 1 percent of the fee due, up to $50.00. The Department shall make every effort to provide a timely assessment of the adequacy of the submitted fee. Failure to pay timely any required annual emissions fee, penalty, or interest constitutes grounds for permit revocation pursuant to Rule 62-4.100, F.A.C.

b. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

c. A completed DEP Form 62-213.900(1), "Major Air Pollution Source Annual Emissions Fee Form", must be submitted by a responsible official with the annual emissions fee.

[Rules 62-213.205(1), (1)(g), (1)(i) & (1)(j), F.A.C.]

**RR7**. Annual Statement of Compliance.

a. The permittee shall submit a Statement of Compliance with all terms and conditions of the permit that includes all the provisions of 40 CFR 70.6(c)(5)(iii), incorporated by reference at Rule 62-204.800, F.A.C., using DEP Form No. 62-213.900(7). Such statement shall be accompanied by a certification in accordance with Rule 62-213.420(4), F.A.C., for Title V requirements and with Rule 62-214.350, F.A.C., for Acid Rain requirements. Such statements shall be submitted (postmarked) to the EPD and EPA:
   (1) Annually, within 60 days after the end of each calendar year during which the Title V permit was effective, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement; and
   (2) Within 60 days after submittal of a written agreement for transfer of responsibility as required pursuant to 40 CFR 70.7(d)(1)(iv), adopted and incorporated by reference at Rule 62-204.800, F.A.C., or within 60 days after permanent shutdown of a facility permitted under Chapter 62-213, F.A.C.; provided that, in either such case, the reporting period shall be the portion of the calendar year the permit was effective up to the date of transfer of responsibility or permanent facility shutdown, as applicable.

b. In lieu of individually identifying all applicable requirements and specifying times of compliance with, non-compliance with, and deviation from each, the responsible official may use DEP Form No. 62-213.900(7) as such statement of compliance so long as the responsible official identifies all reportable deviations from and all instances of non-compliance with any applicable requirements and includes all information required by the federal regulation relating to each reportable deviation and instance of non-compliance.

c. The responsible official may treat compliance with all other applicable requirements as a surrogate for compliance with Rule 62-296.320(2), Objectionable Odor Prohibited.

[Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

**RR8.** Notification of Administrative Permit Corrections.

a. A facility owner shall notify the EPD by letter of minor corrections to information contained in a permit. Such notifications shall include:
   (1) Typographical errors noted in the permit;
   (2) Name, address or phone number change from that in the permit;
   (3) A change requiring more frequent monitoring or reporting by the permittee;
   (4) A change in ownership or operational control of a facility, subject to the following provisions:
      (a) The EPD determines that no other change in the permit is necessary;
      (b) The permittee and proposed new permittee have submitted an Application for Transfer of Air Permit, and the EPD has approved the transfer pursuant to Rule 62-210.300(7), F.A.C.; and
      (c) The new permittee has notified the EPD of the effective date of sale or legal transfer.
   (5) Changes listed at 40 CFR 72.83(a)(1), (2), (6), (9) and (10), adopted and incorporated by reference at Rule 62-204.800, F.A.C., and changes made pursuant to Rules 62-214.340(1) and (2), F.A.C., to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o;
   (6) Changes listed at 40 CFR 72.83(a)(11) and (12), adopted and incorporated by reference at Rule 62-204.800, F.A.C., to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o, provided the notification is accompanied by a copy of any EPA determination concerning the similarity of the change to those listed at Rule 62-210.360(1)(e), F.A.C.; and
   (7) Any other similar minor administrative change at the source.

b. Upon receipt of any such notification, the EPD shall within 60 days correct the permit and provide a corrected copy to the owner.

c. After first notifying the owner, the EPD shall correct any permit in which it discovers errors of the types listed at Rules 62-210.360(1)(a) and (b), F.A.C., and provide a corrected copy to the owner.

d. For Title V source permits, other than general permits, a copy of the corrected permit shall be provided to EPA and any approved local air program in the county where the facility or any part of the facility is located.

[Rule 62-210.360, F.A.C.]

**RR9.** Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the EPD in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.

a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the EPD as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

**RR10.** Report Submission. The permittee shall submit all compliance related notifications and reports required of this permit to the Compliance Authority. {See front of permit for address and phone number.}

**RR11.** EPA Report Submission. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to: Air, Pesticides & Toxics Management Division, United States Environmental Protection Agency, Region 4, Sam Nunn Atlanta Federal Center, 61 Forsyth Street SW, Atlanta, GA 30303-8960. Phone: 404/562-9077.

**RR12.** Acid Rain Report Submission. Acid Rain Program Information shall be submitted, as necessary, to: Department of Environmental Protection, 2600 Blair Stone Road, Mail Station #5510, Tallahassee, Florida 32399-2400. Phone: 850/488-6140. Fax: 850/922-6979.

**RR13.** Report Certification. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C. [Rule 62-213.440(1)(b)3.c, F.A.C.]

**RR14.** Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

**RR15.** Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA. Any permittee may claim confidentiality of any data or other information by complying with this procedure. [Rules 62-213.420(2), and 62-213.440(1)(d)6., F.A.C.]

**RR16.** Forms and Instructions. The forms used by the EPD in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The forms are listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resource Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, by contacting the appropriate permitting authority or by accessing the Department's web site at: http://www.dep.state.fl.us/air/rules/forms.htm.

a. Major Air Pollution Source Annual Emissions Fee Form (Effective 10/12/2008).
b. Statement of Compliance Form (Effective 06/02/2002).
c. Responsible Official Notification Form (Effective 06/02/2002).

[Rule 62-213.900, F.A.C.: Forms (1), (7) and (8)]

## Operation

**TV1.** General Prohibition. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit. [Rule 62-4.030, Florida Administrative Code (F.A.C.)]

**TV2.** Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the EPD. [Rule 62-4.160(2), F.A.C.]

**TV3.** Proper Operation and Maintenance. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by EPD rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by EPD rules. [Rule 62-4.160(6), F.A.C.]

**TV4. Not Federally Enforceable.** Health, Safety and Welfare. To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. [Rule 62-4.050(3), F.A.C.]

**TV5.** Continued Operation. An applicant making timely and complete application for permit, or for permit renewal, shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, and in accordance with applicable requirements of the Acid Rain Program and applicable requirements of the CAIR Program, until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., F.A.C. [Rules 62-213.420(1)(b)2., F.A.C.]

**TV6**. Changes Without Permit Revision. Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation:

a. Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;
b. A permitted source may implement operating changes, as defined in Rule 62-210.200, F.A.C., after the source submits any forms required by any applicable requirement and provides the EPD and EPA with at least 7 days written notice prior to implementation. The source and the EPD shall attach each notice to the relevant permit;
   (1) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;
   (2) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;
c. Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.

[Rule 62-213.410, F.A.C.]

**TV7.** Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

## Compliance

**TV8.** Compliance with Chapter 403, F.S., and EPD Rules. Except as provided at Rule 62-213.460, Permit Shield, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or EPD rules. [Rule 62-4.070(7), F.A.C.]

**TV9**. Compliance with Federal, State and Local Rules. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of a facility or an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the EPD or any other such requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

**TV10.** Binding and enforceable. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the EPD will review this permit periodically and may initiate enforcement action for any violation of these conditions. [Rule 62-4.160(1), F.A.C.]

**TV11.** Timely information. When requested by the EPD, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the EPD, such facts or information shall be corrected promptly. [Rule 62-4.160(15), F.A.C.]

**TV12.** Halting or reduction of source activity. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity. [Rule 62-213.440(1)(d)3., F.A.C.]

**TV13.** Final permit action. Any Title V source shall comply with all the terms and conditions of the existing permit until the EPD has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C. [Rule 62-213.440(1)(d)4., F.A.C.]

**TV14**. Sudden and unforeseeable events beyond the control of the source. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference. [Rule 62-213.440(1)(d)5., F.A.C.]

**TV15.** Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall, as of the effective date of the permit, be deemed compliance with any applicable requirements in effect, provided that the source included such applicable requirements in the permit application. Nothing in this condition or in any permit shall alter or affect the ability of EPA or the EPD to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program or the CAIR Program. [Rule 62-213.460, F.A.C.]

**TV16.** Compliance With Federal Rules. A facility or emissions unit subject to any standard or requirement of 40 CFR, Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. Nothing in this chapter shall relieve a facility or emissions unit from complying with such standard or requirement, provided, however, that where a facility or emissions unit is subject to a standard established in Rule 62-296, F.A.C., such standard shall also apply. [Rule 62-296.100(3), F.A.C.]

## Permit Procedures

**TV17.** Permit Revision Procedures. The permittee shall revise its permit as required by Rules 62-213.400, 62-213.412, 62-213.420, 62-213.430 & 62-4.080, F.A.C.; and, in addition, the EPD shall revise permits as provided in Rule 62-4.080, F.A.C. & 40 CFR 70.7(f).

**TV18.** Permit Renewal. The permittee shall renew its permit as required by Rules 62-4.090, 62.213.420(1) and 62-213.430(3), F.A.C. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) [Application for Air Permit - Long Form], 62-213.420(3) [Required Information], 62-213.420(6) [CAIR Part Form], F.A.C. Unless a Title V source submits a timely and

complete application for permit renewal in accordance with the requirements this rule, the existing permit shall expire and the source's right to operate shall terminate. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009. No Title V permit will be issued for a new term except through the renewal process. [Rules 62-213.420 & 62-213.430, F.A.C.]

**TV19.** Insignificant Emissions Units or Pollutant-Emitting Activities. The permittee shall identify and evaluate insignificant emissions units and activities as set forth in Rule 62-213.430(6), F.A.C.

**TV20.** Savings Clause. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect. [Rule 62-213.440(1)(d)1., F.A.C.]

**TV21**. Suspension and Revocation.

a. Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the EPD.
b. Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.
c. A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The EPD may revoke any permit issued by it if it finds that the permit holder or his agent:
   (1) Submitted false or inaccurate information in his application or operational reports.
   (2) Has violated law, EPD orders, rules or permit conditions.
   (3) Has failed to submit operational reports or other information required by EPD rules.
   (4) Has refused lawful inspection under Section 403.091, F.S.
d. No revocation shall become effective except after notice is served by personal services, certified mail, or newspaper notice pursuant to Section 120.60(5), F.S., upon the person or persons named therein and a hearing held if requested within the time specified in the notice. The notice shall specify the provision of the law, or rule alleged to be violated, or the permit condition or EPD order alleged to be violated, and the facts alleged to constitute a violation thereof.

[Rule 62-4.100, F.A.C.]

**TV22. Not federally enforceable.** Financial Responsibility. The EPD may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and EPD rules. [Rule 62-4.110, F.A.C.]

**TV23.** Emissions Unit Reclassification.

a. Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the EPD, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.
b. If the owner or operator of an emissions unit which is so permanently shut down, applies to the EPD for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

**TV24.** Transfer of Permits. Per Rule 62-4.160(11), F.A.C., this permit is transferable only upon EPD approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the EPD. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility. The permittee shall also comply with the requirements of Rule 62-210.300(7), F.A.C., and use DEP Form No. 62-210.900(7). [Rules 62-4.160(11), 62-4.120, and 62-210.300(7), F.A.C.]

## Rights, Title, Liability, and Agreements

**TV25.** Rights. As provided in Subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other EPD permit that may be required for other aspects of the total project which are not addressed in this permit. [Rule 62-4.160(3), F.A.C.]

**TV26**. Title. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title. [Rule 62-4.160(4), (F.A.C.]

**TV27.** Liability. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and EPD rules, unless specifically authorized by an order from the EPD. [Rule 62-4.160(5), F.A.C.]

**TV28.** Agreements.

a. The permittee, by accepting this permit, specifically agrees to allow authorized EPD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
   (1) Have access to and copy any records that must be kept under conditions of the permit;
   (2) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
   (3) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or EPD rules. Reasonable time may depend on the nature of the concern being investigated.
b. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the EPD may be used by the EPD as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or EPD rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
c. The permittee agrees to comply with changes in EPD rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or EPD rules.

[Rules 62-4.160(7), (9), and (10), F.A.C.]

## Recordkeeping and Emissions Computation

**TV29.** Permit. The permittee shall keep this permit or a copy thereof at the work site of the permitted activity. [Rule 62-4.160(12), F.A.C.]

**TV30.** Recordkeeping.

a. Upon request, the permittee shall furnish all records and plans required under EPD rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the EPD.
b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by EPD rule.
c. Records of monitoring information shall include:
   (1) The date, exact place, and time of sampling or measurements, and the operating conditions at the time of sampling or measurement;

(2) The person responsible for performing the sampling or measurements;
(3) The dates the analyses were performed;
(4) The person and company that performed the analyses;
(5) The analytical techniques or methods used;
(6) The results of such analyses.

[Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]

**TV31.** Emissions Computation. Pursuant to Rule 62-210.370, F.A.C., the following required methodologies are to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with Rule 62-210.370, F.A.C. Rule 62-210.370, F.A.C., is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.

For any of the purposes specified above, the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

a. *Basic Approach*. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
   (1) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the EPD that an alternative approach is more accurate because the CEMS represents still-emerging technology.
   (2) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the EPD that an alternative approach is more accurate.
   (3) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the EPD that an alternative approach is more accurate.

b. *Continuous Emissions Monitoring System (CEMS)*.
   (1) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
      (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or,
      (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
   (2) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
      (a) A calibrated flowmeter that records data on a continuous basis, if available; or
      (b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

(3) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.

c. *Mass Balance Calculations.*

(1) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:

(a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and,

(b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.

(2) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.

(3) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

d. *Emission Factors.*

(1) An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the EPD that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.

(a) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

(b) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.

(c) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

(2) If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.

e. *Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS*. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

f. *Accounting for Emissions During Periods of Startup and Shutdown.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
g. *Fugitive Emissions.* In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
h. *Recordkeeping.* The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the EPD for any regulatory purpose.

[Rule 62-210.370(1) & (2), F.A.C.]

**Responsible Official**

**TV32**. Designation and Update. The permittee shall designate and update a responsible official as required by Rule 62-213.202, F.A.C.

**Prohibitions and Restrictions**

**TV33.** Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

**TV34.** Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Chapter 62-281, F.A.C.

**TV35.** Open Burning Prohibited. Open burning is prohibited unless performed in accordance with the provisions of Rule 62-296.320(3) or Chapter 62-256, F.A.C.

**TV36.** Heavy-Duty Vehicle Idling Reduction. The permittee shall only allow idling of heavy-duty diesel engine powered motor vehicles in accordance with the following provisions:

a. *Applicability*. This rule applies to any heavy-duty diesel engine powered motor vehicle. For the purposes of this rule:
   (1) Heavy-duty diesel engine powered motor vehicle means a motor vehicle:
      (a) With a gross vehicle weight rating equal to or greater than 8,500 pounds;
      (b) Used on roads for the transportation of passengers or freight; and
      (c) Serving a commercial, governmental, or public purpose.
   (2) Gross vehicle weight rating means the value specified by the manufacturer as the maximum design loaded weight of a single vehicle.
b. *Requirement*. Owners or operators of heavy-duty diesel engine powered motor vehicles are prohibited from idling for more than five consecutive minutes. Idling is the continuous operation of a vehicle's main drive engine while the vehicle is stopped.
c. *Exemptions*. The idling restriction of subsection 62-285.420(2), F.A.C., shall not apply:
   (1) To idling while stopped for traffic conditions over which the driver has no control, including being stopped for an official traffic control device or signal, in a line of traffic, at a railroad crossing, at a construction zone, or at the direction of law enforcement;
   (2) To idling of buses 10 minutes prior to passenger loading and when passengers are onboard if needed for passenger comfort;

(3) To idling of an armored vehicle in which a person remains inside the vehicle while guarding the contents of the vehicle or while the vehicle is being loaded or unloaded.
(4) If idling is necessary for a police, fire, ambulance, public safety, military, or other vehicle being used in an emergency or training capacity;
(5) If idling is necessary to verify that the vehicle is in safe operating condition as required by law and that all equipment is in good working order, either as part of a daily vehicle inspection or as otherwise needed, provided that engine idling is mandatory for such verification;
(6) If idling is necessary to accomplish work for which the vehicle was designed, other than propulsion, for example: collecting solid waste or recyclable material; controlling cargo temperature; or operating a lift, crane, pump, drill, hoist, mixer, or other auxiliary equipment other than a heater or air conditioner;
(7) If idling is necessary to operate defrosters, heaters, air conditioners, or other equipment to prevent a safety or health emergency, but not solely for the comfort of the driver;
(8) To idling while the driver is sleeping or resting in a sleeper berth. This exemption expires at midnight September 30, 2013.

[Rule 62-285.420, F.A.C.]

## TABLE H
## PERMIT HISTORY

| EU | Description | Permit Number | Effective Date | Expiration Date | Project Type |
|---|---|---|---|---|---|
| -003 | Bread Baking Processes | 0950364-008-AC | 10/15/2012 | 06/30/2013 | Title V Construction Permit |
| -004 | Ink-Jet Printers | 0950364-008-AC | 10/15/2012 | 06/30/2013 | Title V Construction Permit |
| -003 | Bread Baking Processes | 0950364-007-AV | 12/19/2012 | 12/18/2017 | Title V Operation Permit Revision and Renewal |
| -004 | Ink-Jet Printers | 0950364-007-AV | 12/19/2012 | 12/18/2017 | Title V Operation Permit Revision and Renewal |
| -001 | Bread Line 1, Bread Line 2, Roll Line 1 | 0950364-006-AV | 08/27/2007 | 08/30/2012 | Title V Operation Permit Renewal |
| -001 | Bread Line 1, Bread Line 2, Roll Line 1 | 0950364-005-AV | 08/10/2006 | 08/30/2007 | Title V Operation Permit Revision |
| -001 | Bread Line 1, Bread Line 2, Roll Line 1 | 0950364-004-AC | 01/22/2004 | 02/28/2006 | Title V Construction Permit (extended 1 year) |
| -001 | Bread Line 1, Bread Line 2, Roll Line 1 | 0950364-003-AV | 04/07/2004 | 08/30/2007 | Title V Operation Permit Revision |
| -001 | Bread Line 1, Bread Line 2, Roll Line 1 | 0950364-002-AV | 12/04/2002 | 08/30/2007 | Title V Operation Permit Renewal |
| -001 | Bread Line 1, Bread Line 2, Roll Line 1 | 0950364-001-AV | 05/01/2001 | 05/30/2002 | Change of Conditions |
| -001 | Bread Line 1, Bread Line 2, Roll Line 1 | 0950364-001-AV | 08/28/1997 | 05/30/2001 | Initial Title V Operation Permit |

Title V Air Operation Permit Revision and Renewal
Permit No. 0950364-007-AV

## APPLICANT

The applicant for this project is Interstate Brands Corporation. The applicant's responsible official and mailing address are: Mr. William MacKenzie, Plant Manager, Interstate Brands Corporation, 2200 South Division Avenue, Orlando, Florida, 32805.

## FACILITY DESCRIPTION

This bakery facility makes bread and rolls and packages the product for shipment to retailers. There are three production lines, each with a conveyor oven. Bread Line 1 and Bread Line 2 each consist of a production line for mixing dough, forming and baking products, cooling baked products and packaging for bread loaves. Roll Line 1 consists of a production line for mixing dough, forming and baking products, cooling baked products and packaging for hot dog rolls and similar products. Each production line includes ink-jet printers for printing dates and other product information on individual packages.

Emissions from this facility consist of VOC from the bread baking process (specifically ethanol from yeast fermentation) and miscellaneous VOC from ink-jet printer inks. All three production lines operate without air pollution control equipment. Bread product production and VOC emissions are limited to avoid exceeding the PSD major source threshold for VOC.

The facility also includes flour silos and natural gas-fired combustion equipment that meet the requirements of Rule 62-213.430(6), F.A.C., for insignificant sources. The combustion equipment includes baking ovens, boilers and space heaters.

Also included in this permit are other miscellaneous insignificant emissions units and/or activities.

## PROJECT DESCRIPTION

This project revises and renews permit 0950364-006-AV, and incorporates modifications authorized by construction permit 0950364-008-AC. Changes are described in the Project Review below.

## PROCESSING SCHEDULE AND RELATED DOCUMENTS

Revised and Renewed Title V Air Operation Permit issued December 19, 2012
Air Construction Permit issued October 15, 2012
Application for a Title V Air Operation Permit Renewal received January 18, 2012
Application for a Title V Air Operation Permit Revision and Renewal received June 14, 2012
Additional Information Request dated March 16, 2012
Additional Information Response received June 14, 2012
Notice of Intent to Issue Air Permit issued August 31, 2012
Public Notice Published September 23, 2012

## PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility because there is no air pollution control equipment on any regulated emission units.

## PROJECT REVIEW

The facility timely submitted on January 18, 2012 a Title V operation permit renewal application to renew the Title V operation permit expiring August 30, 2012. The applicant applied on June 14, 2012 to the EPD for an air construction permit and a revised Title V operation permit. The scope of the Title V operation permit renewal and revision is:

1. Renew permit 0950364-006-AV and revise it to incorporate the modifications listed in construction permit 0950364-008-AC. Process permit 0950364-008-AC concurrently with permit 0950364-007-AV.
2. Remove the limitations on natural gas consumption of Bread Line 1, Bread Line 2 and Roll Line 1 in permit 0950364-006-AV condition A2 and replace with a facility-wide natural gas consumption limit of 85 million cubic feet per consecutive 12 months. This modification allows natural gas-fired equipment to meet the insignificant source requirements of Rule 62-213.430(6), F.A.C. Compliance is demonstrated using the facility's only gas meter.
3. Create a new emission unit, "EU 003 – Bread Baking Processes" for VOC emissions from the baking process. The ovens and other combustion equipment are insignificant sources. The old EU 001, Bread Lines #1 and #2 and Roll Line #1, is reclassified as inactive.
4. Remove the existing Ink jet printers - ink and Ink-jet printers – makeup from the insignificant sources list and place them in a regulated emission unit, "EU 004 – Ink Jet Printers". Add recordkeeping for the printer ink and makeup usages so VOC emissions can be determined and added to the VOC from the baking process to determine facility-wide VOC emissions.
5. Add "Wheat Flour Silo with Bin-Vent Filter" to the list of Insignificant Sources. Add a specific condition requiring the facility to maintain the bin-vent filter atop the wheat flour silo in good working order.
6. Remove specific condition A5 in permit 0950364-006-AV, regarding visible emissions limits. There are no visible emission limits or compliance test requirements for insignificant emission units or activities.
7. Reduce the facility-wide VOC emission limit from 249 tons per consecutive 12 months to 230 tons per consecutive 12 months.
8. Change the permit format to reflect the changes recommended by FDEP.

## CONCLUSION

This project revises and renews Title V air operation permit No. 0950364-006-AV, which was issued on August 27, 2007. This Title V air operation permit renewal and revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.

Table 1, Summary of Air Pollutant Standards and Terms.

| EU | Brief Description | Hrs/Yr | Pollutant Name | Standard Allowable Emissions | Equivalent Emissions | | See Permit Condition(s) |
|---|---|---|---|---|---|---|---|
| | | | | | lbs/hr | TPY | |
| 003 | Bread Baking Processes | 8760 | VOC | N/A | N/A | N/A | N/A |
| 004 | Ink-Jet Printers | 8760 | VOC | N/A | N/A | N/A | N/A |
| Facility-Wide | | 8760 | VOC | N/A | N/A | 230 | A.3. |

Table 2, Compliance Requirements.

| EU | Brief Description | Pollutant Name | Emission Control | Compliance Method | Testing Time Frequency | Compliance Test Duration | See Permit Condition(s) |
|---|---|---|---|---|---|---|---|
| 003 | Bread Baking Processes | VOC | None | Recordkeeping | N/A | N/A | A.5. |
| 004 | Ink-Jet Printers | VOC | None | Recordkeeping | N/A | N/A | A.5. |
| Facility-Wide | | VOC | | Recordkeeping | | | A.5. |