

August 6, 2013

CERTIFIED MAIL:

Mr. Les Messina
Vice President of Plant Operations
Turano Florida Bun, LLC
6501 West Roosevelt Road
Berwyn, IL 60402

Subject: Project Number 0951322-003
Turano Florida Bun, LLC
Synthetic Minor Source Air Construction Permit
Project Name: Add Bakery Oven No. 2

Dear Mr. Messina:

On June 19, 2013, you submitted a construction permit application to construct and install a new bakery oven with three (3) oven exhaust stacks. This facility is located in Orange County at 151 Martin Brower Road, Suite 115, in Orlando, Florida.

Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Draft Permit and Appendices; and the Technical Evaluation and Preliminary Determination. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the project engineer, Natrevia Gradney-Mitchell, P.E., at 407-836-1400.

Sincerely,

Reneé H. Parker
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division

Enclosures

(4)NGM/JMK/RHP:bh

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an Application for Air Permit by:

Turano Florida Bun, LLC
6501 West Roosevelt Road
Berwyn, Illinois 60402

Air Permit Number: 0951322-003-AC
Synthetic Minor Source Air Construction Permit
Orange County, Florida

Authorized Representative:
Les Messina, Vice President of Plant Operations

Turano Florida Bun, LLC
Project Name: Add Bakery Oven No. 2

Facility Location: Turano Florida Bun, LLC operates the existing plant, which is located in Orange County at 151 Martin Brower Road, Suite 115, in Orlando, Florida.

Project: The applicant proposes to construct and install a new, natural gas-fired bakery oven rated at 3.8 MMBtu/hr with 3 associated exhaust stacks. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Air Quality Management section of the Orange County Environmental Protection Division (EPD). The EPD's address is 800 Mercy Drive, Suite 4, Orlando, Florida 32808. The EPD's telephone number is 407-836-1400.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact EPD's project engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Permit: The EPD gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The EPD will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the EPD at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the EPD at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Comments: The EPD will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the EPD by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the EPD shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the EPD for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPD's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that EPD's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of EPD on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Orlando, Florida.

Reneé H. Parker
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Les Messina, Turano Florida Bun, LLC (lmessina@turano.com)
Art Teixeira, P.E., (atex@ufl.edu)
Tom Lubozynski, P.E., Florida DEP (tom.lubozynski@dep.state.fl.us)
Reneé H. Parker, OCEPD (renee.parker@ocfl.net)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Orange County Environmental Protection Division
Air Quality Management
Draft Synthetic Minor Source Air Construction Permit
Project Number 0951322-003-AC
Turano Florida Bun, LLC
Orange County, Florida

Applicant: The applicant for this project is Turano Florida Bun, LLC. The applicant's authorized representative and mailing address is: Les Messina, Vice President of Plant Operations, 6501 West Roosevelt Road, Berwyn, Illinois 60402.

Facility Location: Turano Florida Bun, LLC operates the existing plant, which is located in Orange County at 151 Martin Brower Road, Suite 115, in Orlando, Florida.

Project: The applicant proposes to construct and install a new, natural gas-fired bakery oven rated at 3.8 MMBtu/hr with 3 associated exhaust stacks.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Air Quality Management section of the Orange County Environmental Protection Division (EPD). The EPD's address is 800 Mercy Drive, Suite 4, Orlando, Florida 32808. The EPD's telephone number is 407-836-1400.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the EPD. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the EPD's project engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Air Permit: The EPD gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The EPD will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The EPD will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the EPD by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the EPD shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

(Public Notice to be Published in the Newspaper)

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the EPD for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPD's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the EPD's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPD's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the EPD on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

***** DRAFT PERMIT *****

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Turano Florida Bun, LLC
6501 West Roosevelt Road
Berwyn, Illinois 60402

Air Permit No. 0951322-003-AC
Permit Expires: May 31, 2015

Authorized Representative:
Les Messina, Vice President of Plant Operations

Apopka Design and Manufacturing Center
Synthetic Minor Source Air Construction
Permit
Project Name: Add Bakery Oven No. 2

This is the final air construction permit for a bread manufacturing facility, which authorizes construction of a new bakery oven. The proposed work will be conducted at Turano Florida Bun, LLC (Standard Industrial Classification No. 2051 – Bread, Cake, and Related Products). The facility is located in Orange County at 151 Martin Brower Road in Orlando, Florida. The UTM coordinates are Zone 17, 463.42 km East, and 3138.34 km North.

As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices: (The following appendices are enforceable parts of this permit):

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. Common Testing Requirements

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

(DRAFT)

 Reneé H. Parker (Date)
 Environmental Program Supervisor
 Air Quality Management
 Orange County Environmental Protection Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

- Les Messina, Turano Florida Bun, LLC (lmessina@turano.com)
- Art Teixeira, P.E., (atex@ufl.edu)
- Tom Lubozynski, P.E., Florida DEP (tom.lubozynski@dep.state.fl.us)
- Reneé H. Parker, OCEPD (renee.parker@ocfl.net)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(DRAFT)

 (Clerk) (Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Existing Facility Description

Turano Florida Bun, LLC is a bread bakery consisting of a bakery oven; three silos for storing flour; six exempt emergency generators; two exempt boilers; four storage tanks for vegetable oil, corn syrup and yeast; and three mixing and process tanks. The level of volatile organic compound (VOC) emissions classifies this facility as a **synthetic minor** source. The existing facility consists of the following emission unit.

Facility ID No. 0951322	
ID No.	Emission Unit Description
001	Bakery Oven No. 1

Equipment Exempt from Air Permitting. This bakery facility contains the following equipment that is exempt from air permitting under the stated conditions.

1. Two Johnston Model 509PFTX 200 HP boilers, rated at 8.22 MMBTU/hr each, fired by natural gas only. These boilers meet the requirements of Rule 62-210.300(3)(a)34., F.A.C., for a categorical exemption from air permitting for fossil fuel steam generating units with heat input capacity of less than 100 MMBTU/hr.
2. Six Generac Model MG300 emergency generators, each rated at 4.2 MMBTU/hr heat input, fired by natural gas only. These emergency generators can meet the requirements of Rule 62-210.300(3)(a)35., F.A.C., for a categorical exemption from air permitting for emergency generators, under the following conditions.
 - a. The natural gas fuel consumption of these engines must not exceed 4.4 million standard cubic feet per year.
 - b. These engines must not be subject to a unit specific applicable requirement. A possible unit specific applicable requirement is 40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. These engines will not be subject to Subpart JJJJ if they are manufactured before January 1, 2009, the applicability date for this type of emergency generator in Subpart JJJJ.

Proposed Project

This project is for an air construction permit to construct and install a second natural gas-fired bakery oven at the facility (Bakery Oven No. 2).

This project also updates the boiler exemption criteria of Rule 62-210.300(3)(a)34., F.A.C., to include applicable language from the rule.

This project changes the classification of the six emergency generator reciprocating internal combustion engines (RICE) from an exempt emission unit to a regulated emission unit. The change is necessary because the RICE exemption criteria of Rule 62-210.300(3)(a)35., F.A.C., recently doubled the fuel consumption limit and allowed the generators to emit more than 100 TPY CO, making the facility a potential Title V source of CO. Exemptions for potential Title V sources are not allowed by Rule 62-210.300(3), F.A.C. Emission unit 003 was created for the six RICE and a limit was placed on hours of operation to keep the facility a synthetic minor source. This project also notes that the RICE are subject to the recently revised NESHAP 40 CFR Part 63 Subpart ZZZZ. Maintenance requirements from the NESHAP were added for the RICE emission unit.

This project will create the following emission units.

SECTION 1. GENERAL INFORMATION (DRAFT)

Facility ID No. 0951322	
ID No.	Emission Unit Description
002	Bakery Oven No. 2
003	Emergency Generator RICE

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Emission Units and Activities Exempt from Air Permitting. This bakery facility contains the following equipment that is exempt from air permitting under the stated conditions.

1. Two Johnston Model 509PFTX 200 HP boilers, rated at 8.22 MMBTU/hr each, fired by natural gas only. These boilers meet the requirements of Rule 62-210.300(3)(a)34., F.A.C., for a categorical exemption from air permitting for fossil fuel steam generating units with rated heat input capacity of each unit less than 100 MMBTU/hr, and the total heat input of all units combined less than 250 MMBTU/hr.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility is a synthetic minor source of volatile organic compounds (VOC).

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting & Compliance Authority: The permitting authority for this project is the Orange County Environmental Protection Division (EPD). All documents related to applications for permits to operate emission units and compliance activities such as reports, tests, and notifications shall be submitted to EPD. The mailing address and phone number of the EPD is 800 Mercy Drive, Suite 4, Orlando, FL 32808 and 407-836-1400.
2. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix C. Common Testing Requirements.
3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Annual Operating Report (AOR): The permittee shall complete DEP Form No. 62-210.900(5), F.A.C., "Annual Operating Report for Air Pollutant Emitting Facility," including the Emissions Report, for each calendar year and submit it to EPD on or before **April 1st** of the following year.
[Rule 62-210.370(3), F.A.C.]
7. Application for Operation Permit Revision: This permit authorizes construction of the new bakery oven and initial operation to determine compliance with EPD rules. An air operation permit revision is required for regular operation of the permitted emissions unit. **The permittee shall apply for an air operation permit revision at least 90 days prior to expiration of this permit.** To apply for an air operation permit revision, the applicant shall submit the appropriate application form to the EPD, the appropriate fee listed in Rule 62-4.050(4), and such additional information as EPD may by law require.
[Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

EU 002-Bakery Oven No. 2 and EU 003-Emergency Generator RICE

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	<u>Bakery Oven No. 2</u> EU 002 is a bakery oven fired with natural gas. This new Stewart Systems Model 090222-D700 bakery oven is rated at a maximum heat input of 3.8 MMBTU/hr. There are three exhaust stacks for the oven. This bakery oven has a maximum production rate of 3.0 tons of bread per hour (26,280 tons of bread per year).
003	<u>Emergency Generator RICE</u> EU 003 consists of six Generac Model MG300 emergency generators, powered by RICE fired with natural gas only. Each generator is rated at 300 kW and has a maximum fuel consumption of 4100 cubic feet per hour. The RICE are subject to NESHAP 40 CFR 63 Subpart ZZZZ.

EQUIPMENT

1. Bakery Oven No. 2: The facility is authorized to construct a Stewart Systems Model 090222-D700 bakery oven rated at a maximum heat input of 3.8 MMBTU/hr. This bakery oven is fired by natural gas only. This bakery oven has a maximum production rate of 3.0 tons of bread per hour (26,280 tons of bread per year). [Permit application received June 19, 2013]
2. Emergency Generator RICE: The classification of the six existing emergency generators is changed from an exempt emission unit to a regulated emission unit to impose an operating time limit that keeps the facility a synthetic non-Title V source. The RICE are subject to NESHAP 40 CFR 63 Subpart ZZZZ, but are not subject to 40 CFR Part 60 Subpart JJJJ. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

PERFORMANCE RESTRICTIONS

3. Hours of Operation: The six emergency generators are limited to a total operating time of 1,200 hours per year. The remainder of the facility is permitted to operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C. and Permit application received June 19, 2013]
4. Bread Production Limit: The facility is limited to an annual bread production of 64,386 tons per consecutive 12-month period. [Rule 62-210.200(PTE), F.A.C. and Permit application received June 19, 2013]
5. Authorized Fuel: The facility is limited to operate using natural gas fuel only. [Rule 62-210.200(PTE), F.A.C. and Permit application received June 19, 2013]
6. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants that cause or contribute to an objectionable odor. An objectionable odor is defined as any odor present in the outdoor atmosphere that 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. [Rules 62-296.320(2) and 62-210.200(PTE), F.A.C., Orange County Ordinance Chapter 15 Article III]
7. 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 or alteration; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following:
 - a. Paving and maintenance of roads, parking areas and yards.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

EU 002-Bakery Oven No. 2 and EU 003-Emergency Generator RICE

- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - c. 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.
 - d. Use of hoods, fans, filters, and similar equipment to contain, capture and vent particulate matter.
[Rule 62-296.320(4)(c), F.A.C.]
8. **General VOC Requirements.** 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. This includes:
- a. Maintaining in good operating condition all piping, valves, fittings, flanges, tanks and containers used for storage and transfer of organic liquids.
 - b. When not in use, directing solvent-containing materials to containers that prevent evaporation.
[Rule 62-296.320(1), F.A.C.]

EMISSIONS STANDARDS

9. **Visible Emissions Limitation.** Visible emissions from all particulate emission points are limited to less than 20% opacity.
[Rule 62-296.320(4)(b)1., F.A.C., and Permit application received June 19, 2013]
10. **VOC Emissions Limitation.** The maximum permitted facility-wide VOC emissions shall be less than 90.0 tons per consecutive 12 month period.
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and Permit application received June 19, 2013]

TESTING REQUIREMENTS

11. **Initial Compliance Tests:** The three oven stacks and the six emergency generator exhaust stacks shall be tested to demonstrate initial compliance with the visible emissions standards for visible emissions specified in Specific Condition Number 9. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]
12. **Compliance Testing Prior to Operation Permit Renewal:** At least 120 days prior to the expiration of the operation permit, the emissions units shall be tested to demonstrate compliance with the standard for visible emissions specified in Specific Condition Number 9.
[Rule 62-297.310(7)(a)3, F.A.C.]
13. **Test Requirements:** The permittee shall notify EPD at least 15 days prior to the date on which each formal compliance test is due to begin; the permittee shall provide written notification of the test to EPD. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility’s contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9., F.A.C.]
14. **Test Method:** Required tests shall be performed in accordance with the following reference methods.

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources. The minimum period of observation shall be 30 minutes for compliance tests.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

EU 002-Bakery Oven No. 2 and EU 003-Emergency Generator RICE

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

15. Operating Rate During Testing. Testing of emissions shall be conducted with the equipment operating at permitted capacity of 3.0 tons per hour. Permitted capacity is defined as 90 to 100 percent of the maximum operating rate allowed by the permit. If it is impractical to test at permitted capacity, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C]

RECORDS AND REPORTS

16. VOC Emissions Calculations. VOC emissions from the bread production process shall be calculated using the following equation to determine the emission factor. VOC emissions shall be calculated by multiplying the emission factor by the quantity of bread produced in tons per reporting period.

$$\text{VOC Emission Factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

Where:

VOC Emission Factor = Pounds VOC emission per ton of baked bread produced

Y_i = Initial baker's percent of yeast

t_i = Total yeast action time in hours

S = Final (spike) baker's percent of yeast

t_s = Spiking time in hours

[Rule 62-296.320(4)(b)1., F.A.C.; Ap-42, Section 9.9.6; and Permit application received June 19, 2013]

17. Subpart ZZZZ Requirements. The facility shall perform the following tasks and maintain records to verify that the six Generac Model MG300 emergency generators meet the requirements of 40 CFR Part 63 Subpart ZZZZ.
- Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
 - Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary;
 - Operate and maintain the emergency generator RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - Develop and follow the facility's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- [Rules 62-4.070(3), F.A.C., 40 CFR 63 Subpart ZZZZ Tables 2d and 6]
18. Recordkeeping Requirements. A log shall be kept for this facility to document compliance with the limitations of Specific Condition Numbers 3, 4 and 10. The log shall be completed within 30 days of the end of the month reported, and shall be retained on file at the facility for at least five years. The log shall contain the following for each month:
- Month and year for which data was recorded;
 - Monthly and consecutive 12-month totals of the quantity of bread produced in tons;
 - Monthly and consecutive 12-month totals of the VOC emissions in tons, from the bread production process;

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

EU 002-Bakery Oven No. 2 and EU 003-Emergency Generator RICE

d. Monthly and consecutive 12-month totals of emergency generator operating hours (total for all six engines).

[Rule 62-4.070(3), F.A.C.]

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.

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

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

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° **F:** degrees Fahrenheit

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

Btu: British thermal units	MSDS: material safety data sheets
CEMS: continuous emissions monitoring system	MW: megawatt
cfm: cubic feet per minute	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CFR: Code of Federal Regulations	NO_x: nitrogen oxides
CAA: Clean Air Act	NSPS: New Source Performance Standards
CMS: continuous monitoring system	O&M: operation and maintenance
CO: carbon monoxide	O₂: oxygen
CO₂: carbon dioxide	Pb: lead
COMS: continuous opacity monitoring system	PM: particulate matter
DARM: Division of Air Resource Management	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
DEP: Department of Environmental Protection	ppm: parts per million
Department: Department of Environmental Protection	ppmv: parts per million by volume
dscf: dry standard cubic feet	ppmvd: parts per million by volume, dry basis
dscfm: dry standard cubic feet per minute	QA: quality assurance
EPA: Environmental Protection Agency	QC: quality control
EPD: Orange County Environmental Protection Division	PSD: prevention of significant deterioration
EU: emissions unit	psi: pounds per square inch
F.A.C.: Florida Administrative Code	PTE: potential to emit
F.A.W.: Florida Administrative Weekly	RACT: reasonably available control technology
F.D.: forced draft	RICE: reciprocating internal combustion engine
F.S.: Florida Statutes	SAM: sulfuric acid mist
Fl: fluoride	scf: standard cubic feet
ft²: square feet	scfm: standard cubic feet per minute
ft³: cubic feet	SIC: standard industrial classification code
gpm: gallons per minute	SO₂: sulfur dioxide
gr: grains	TPD: tons/day
HAP: hazardous air pollutant	TPH: tons per hour
Hg: mercury	TPY: tons per year
I.D.: induced draft	UTM: Universal Transverse Mercator coordinate system
ID: identification	VE: visible emissions
kPa: kilopascals	VOC: volatile organic compounds
lb: pound	
MACT: maximum achievable control technology	
MMBtu: million British thermal units	

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. 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 EPD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. 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 EPD.
3. 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 department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. 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.
5. 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 Florida Statutes and EPD rules, unless specifically authorized by an order from FDEP and EPD.
6. 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.
7. 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:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. 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.
8. 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 EPD with the following information:
 - a. A description of and cause of noncompliance; and
 - b. 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 EPD for penalties or for revocation of this permit.

SECTION 4. APPENDIX B

General Conditions

9. 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 EPD may be used by 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.
10. 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.
11. This permit is transferable only upon EPD approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by EPD.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - 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 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 three years from the date of the sample, measurement, report, or application unless otherwise specified by EPD rule;
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates the analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by 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 EPD, such facts or information shall be corrected promptly.
16. 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.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify EPD as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future 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 the conditions of this permit or the regulations.
[Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by EPD for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision.
[Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by EPD.
[Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by EPD.
[Rule 62-296.320(1), F.A.C.]
7. 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.
[Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. 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. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

SECTION 4. APPENDIX C

Common Conditions

9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary.
[Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to EPD upon request.

[Rule 62-213.440(1)(b)2, F.A.C.]

11. Supporting Documentation: Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products, which includes sufficient information to determine usage rates and emissions. These records shall be made available to EPD upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage and emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years. Daily logs shall be completed within 7 business days.

[Rule 62-4.070(3), F.A.C.]

12. Emissions Computation and Reporting:

- a. *Applicability*. This rule sets forth required methodologies 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 this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit;

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

- b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection;

- (1) *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:

- (a) 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 EPD that an alternative approach is more accurate because the CEMS represents still-emerging technology;

SECTION 4. APPENDIX C

Common Conditions

- (b) 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 EPD that an alternative approach is more accurate;
 - (c) 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 EPD that an alternative approach is more accurate;
- (2) Mass Balance Calculations;
- (a) 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:
 - 1) 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
 - 2) 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.
 - (b) 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;
 - (c) 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.
- (3) Emission Factors;
- (a) 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 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:
 - 1) 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;
 - 2) 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;

SECTION 4. APPENDIX C

Common Conditions

- 3) 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.
 - (b) 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.
- (4) 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;
- (5) 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;
- (6) 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;
- (7) 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 EPD for any regulatory purpose.

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

c. *Annual Operating Report for Air Pollutant Emitting Facility;*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - (a) All synthetic non-Title V sources;
 - (b) All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
- (2) The annual operating report shall be submitted to EPD by April 1 of the following year. If the report is submitted using the FDEP electronic annual operating report software, there is no requirement to submit a copy to EPD;
- (3) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.

[Rule 62-210.370(3), F.A.C.]

- d. *Facility Relocation.* Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to EPD at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(4), F.A.C.]

SECTION 4. APPENDIX D
Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rule 62-297.310(2), F.A.C.]
2. Applicable Test Procedures - Opacity Compliance Tests: When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time;
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard;
 - c. The minimum observation period for opacity tests conducted by employees or agents of EPD to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.[Rule 62-297.310(4), F.A.C.]
3. Determination of Process Variables:
 - a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards;
 - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.[Rule 62-297.310(5), F.A.C.]
4. Frequency of Compliance Tests: The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing*:
 - (1) The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit;

SECTION 4. APPENDIX D
Common Testing Requirements

- (2) The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit;
 - (3) The owner or operator shall notify EPD, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- b. *Special Compliance Tests.* When EPD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in an FDEP rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to EPD.

[Rule 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with EPD on the results of each such test. The required test report shall be filed with EPD as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow EPD to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information:
- a. The type, location, and designation of the emissions unit tested;
 - b. The facility at which the emissions unit is located;
 - c. The owner or operator of the emissions unit;
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run;
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard;
 - f. The date, starting time and end time of the observation;
 - g. The test procedures used;
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report;
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure;
 - j. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

APPLICANT

Turano Florida Bun, LLC
6501 West Roosevelt Road
Berwyn, IL 60402

Facility ID No. 0951322

PROJECT

Project No. 0951322-003-AC
Application for Synthetic Minor Source Air Construction Permit
Add Bakery Oven No. 2

COUNTY

Orange County, Florida

PERMITTING AUTHORITY

Orange County Environmental Protection Division
Air Quality Management
800 Mercy Drive, Suite 4
Orlando, Florida 32808

August 6, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

In accordance with the terms of its Specific Operating Agreement, the Orange County Environmental Protection Division has been delegated the authority to process this application on behalf of the Department.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Turano Florida Bun, LLC is a bread bakery consisting of: one (1) existing bakery oven with three (3) flour silos; six (6) exempt emergency generators; two (2) exempt boilers; four (4) storage tanks for vegetable oil, corn syrup and yeast; and three (3) mixing/process tanks. Potential air emissions are primarily VOC emissions due to ethanol in the baking process. The facility is located in Orange County at 151 Martin Brower Road, Orlando, Florida. The UTM coordinates are Zone 17, 463.42 km East, and 3138.34 km North.

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is a synthetic minor source of VOC emissions.

Project Description

This project is for an air construction permit to construct and install a second natural gas-fired bakery oven at the facility (Bakery Oven No. 2).

This project also updates the boiler exemption criteria of Rule 62-210.300(3)(a)34., F.A.C., to include applicable language from the rule.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

This project changes the classification of the six emergency generator reciprocating internal combustion engines (RICE) from an exempt emission unit to a regulated emission unit. The change is necessary because the RICE exemption criteria of Rule 62-210.300(3)(a)35., F.A.C., recently doubled the fuel consumption limit and allowed the generators to emit more than 100 TPY CO, making the facility a potential Title V source of CO. Exemptions for potential Title V sources are not allowed by Rule 62-210.300(3), F.A.C. Emission unit 003 was created for the six RICE and a limit was placed on hours of operation to keep the facility a synthetic minor source. This project also notes that the RICE are subject to the recently revised NESHAP 40 CFR Part 63 Subpart ZZZZ. Maintenance requirements from the NESHAP were added for the RICE emission unit.

This project will create the following emission units.

Facility ID No. 0951322	
ID No.	Emission Unit Description
002	Bakery Oven No. 2
003	Emergency Generator RICE

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Emission Units and Activities Exempt from Air Permitting. This bakery facility contains the following equipment that is exempt from air permitting under the stated conditions.

1. Two Johnston Model 509PFTX 200 HP boilers, rated at 8.22 MMBTU/hr each, fired by natural gas only. These boilers meet the requirements of Rule 62-210.300(3)(a)34., F.A.C., for a categorical exemption from air permitting for fossil fuel steam generating units with rated heat input capacity of each unit less than 100 MMBTU/hr, and the total heat input of all units combined less than 250 MMBTU/hr.

Processing Schedule

- 06/19/2013 Received the application for a synthetic minor source air pollution construction permit.
07/09/2013 Application review results: application complete.
08/06/2013 Mail Written Notice of Intent to Issue Air Permit, Public Notice of Intent to Issue Air Permit, and Draft Construction Permit.

2. PSD APPLICABILITY

PSD does not apply to this project.

3. APPLICATION REVIEW

Discussion of Emissions

This project is for an air construction permit to construct and install a second natural gas-fired bakery oven at the facility (Bakery Oven No. 2). Calculated potential VOC emissions from the bread baking processes were taken from the application, for the oven operating at rated capacity of 3 tons/hr for 8760 hr/yr.

This project changes the classification of the six emergency generator RICE from an exempt emission unit to a regulated emission unit. The change is necessary because the RICE exemption criteria of Rule 62-210.300(3)(a)35., F.A.C., claimed for these engines has been changed. For the 0951322-001-AC permit issued in 2008, the fuel consumption limit for the categorical exemption in Rule 62-210.300(3)(a)35., F.A.C. was 4.4 MMCF/yr. That categorical exemption limit was changed to 8.8 MMCF several years ago, and equipment claiming that categorical exemption would be allowed the higher limit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Emission factors for the Generac Model MG300 emergency generators shown in the table below were provided by the manufacturer. This information was supplied for the 0951322-001-AC permit.

Pollutant	Emission Factor, gm/HP-hr
NOx	2.12
CO	118.3
VOC (Hydrocarbons or HC)	2.91

These emission factors indicate that CO will be the limiting pollutant for these engines. With the 4.4 MMCF/yr limit and the Generac CO emission factor, the potential CO emissions were 63.5 TPY for the six emergency generators alone for the -001-AC permit. If the six engines were given the same categorical exemption for the present permit, the fuel consumption limit of 8.8 MMCF/yr would result in potential CO emissions of 127 TPY. These emissions would exceed the Title V threshold. The emergency generator emission unit could not claim that categorical exemption if the potential emissions exceeded the Title V threshold (see Rule 62-210.300(3), F.A.C.). So, the emergency generators must be in a regulated emission unit, and could be given a fuel consumption or other limit for the facility to remain a synthetic non-Title V source. With no separate fuel meter for these engines, the engines were given an operating hour limit with the maximum fuel consumption assumed for every hour of operation. This results in an operating hour limit of 200 hr/yr per engine, or 1,200 hr/yr for all six engines combined. For the best operating flexibility for the facility, the 1,200 hr/yr limit was set in the permit condition. Emission unit 003 was created for the six RICE.

Potential emissions for the two exempt boilers were calculated using the fuel consumption limit of 375 MMCF/yr of the categorical exemption in Rule 62-210.300(3)(a)34., F.A.C., claimed for these boilers.

A summary of the total facility-wide potential emissions are shown in the table below.

Pollutant	EU 001 PTE, TPY	EU 002 PTE, TPY	EU 003 PTE, TPY	Exempt Boilers PTE, TPY	Total Facility- Wide PTE, TPY	Permitted Emissions Limit, TPY	Title V Threshold, TPY
VOC	50.2	34.3	1.7	1.0	87.2	90.0	100
NO _x	2.2	1.7	1.3	18.8	24.0		100
SO ₂	0.0	0.0	0.0	0.1	0.2		100
CO	1.8	1.4	71.0	15.8	90.0		100
PM	0.2	0.1	0.0	1.4	1.7		100
VE						20 percent	---

The facility remains a synthetic non-Title V source, with limits on bread production to limit emissions of VOC, and limits on generator operating hours to limit emissions of CO.

State Requirements

- 62-4.070 Standards for Issuing or Denying Permit
- 62-4.210 Construction Permits
- 62-204.800 Federal Regulations Adopted By Reference
- 62-210.200 Definitions
- 62-210.300 Permits Required
- 62-210.370 Emissions computation and reporting
- 62-296.320 General Pollutant Emission Limiting Standards
- 62-297.310 General Compliance Test Requirements

Federal NSPS Provisions

N/A

Federal NESHAP Provisions

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines applies to exempt emergency generators.

Other Permit Requirements

Orange County Ordinance Chapter 15 Article III

4. PRELIMINARY DETERMINATION

The Orange County Environmental Protection Division makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Natrevia Gradney-Mitchell, P.E. is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Orange County Environmental Protection Division, 800 Mercy Drive, Suite 4, Orlando, Florida 32808, 407-836-1400.