Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Pepperidge Farm, Inc.
Lakeland Facility
2222 Interstate Drive
Lakeland, FL 33805-2306

Air Permit No. 1050174-010-AC
Permit Expires: 12/31/2015
Lakeland Facility
Minor Air Construction Permit
Project Name: Add a new microwave heating unit

Authorized Representative:
Mr. Sam Morrone, Plant Manager

This is the final construction permit to add a new microwave heating unit to the Baking Line No. 5 – Cracker Oven No. 2, Emissions Unit (EU) No. 016. The proposed work will be conducted at the Pepperidge Farm, Inc., Lakeland Facility (Standard Classification Nos. 2051 & 2052). The facility is located in Polk County at 2222 Interstate Drive, Lakeland, Florida. The UTM coordinates are Zone 17, 403.64.67 km East, and 3105.80 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

Due to 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 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 Hillsborough County, Florida

DRAFT

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Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 the date indicated below to the persons listed below.

Sam Morrone, Pepperidge Farm, Inc. (sam_morrone@pepperidgefarm.com)
Iman Jones, Pepperidge Farm, Inc. (iman_jones@pepperidgefarm.com)
William Straub, P.E., all4inc.com (wstraub@all4inc.com)

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

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(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility owns and operates a commercial food products manufacturing facility in Lakeland, Florida. The facility manufactures bread and cracker products. This facility consists of seven (7) flour silos, one (1) biscuit sugar silo, five (5) baking lines which include five (5) natural gas-fired ovens for the baking lines and two (2) regenerative thermal oxidizers (RTO).

Particulate emissions from silo loading operations are each controlled by baghouse dust collectors mounted on the top of each silo. VOC emissions from baking line Nos. 1 – 3 and their natural gas-fired ovens are uncontrolled. VOC emissions from Baking Line Nos. 5 and 6 are routed through two separate RTOs, which are also fired with natural gas. The temperature of each RTO is continuously monitored and recorded. The RTOs are subject to the Compliance Assurance Monitoring requirements of 40 CFR 64 and 62-213.440(4)(b)4., F.A.C.

Baking Line No. 4 has been permanently removed from the facility.

Also included in this permit are miscellaneous insignificant emissions units and/or activities that include two (2) natural gas-fired boilers, a gas-fired hot water heater, an industrial clothes dryer, oiling operation of facility machinery parts, maintenance/repair/painting, and other activities listed in Appendix I-1.

Based on the Title V Air Operation Renewal application received August 21, 2009, this facility is a major source of hazardous air pollutants (HAPs). This facility is classified as a PSD major facility.

Project Description and Affected Emissions Unit

This is a non-PSD minor construction permit for an existing PSD major facility. The applicant proposes to add a new microwave heating unit to the existing Baking Line No. 5 Cracker Oven No. 2, EU No. 016. In addition to the proposed microwave heating unit, the Lakeland facility will be adding a new chiller for the proposed microwave unit, new product conveyors, and a new seasoning system as part of this project. This additional equipment shall not result in increase in production or significant increase in potential to emit air pollutants from the facility.

This project will modify the following emissions unit:

Facility ID No. 1050174

EU ID No.	Emission Unit Description
016	Baking Line No. 5 Cracker Oven No. 2

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

FACILITY REGULATORY CLASSIFICATION

- The facility is 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 a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

References with Title V Permit No. 1050174-009-AV

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Resource Management Section. The Southwest District Office's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Permitting Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance and Enforcement Section - Attention: AIR. The mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Compliance Assurance Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

3. 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 D. Common Testing Requirements.

4. 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.

5. 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.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emissions unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Source Obligation (PSD Major Facilities only):

   a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

8. Actual Emissions Reporting (PSD Major Facilities only) - This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      1) The name, address and telephone number of the owner or operator of the major stationary source;

      2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

      3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and,

      4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

   For this project, the Department requires the annual reporting of actual VOC emissions for the emissions unit EU No. 016.

   [Permit Application dated 04/22/2013; Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

9. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
   [Rule 62-210.370(3), F.A.C.]

10. Application for Title V Air Operation Permit - This permit authorizes construction of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Title V air operation permit, the applicant shall submit the following:

    a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

    b. a copy of the most recent compliance test reports required by Specific Condition No. A.14.

    [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

A. EU No. 016

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emission Unit Description
016	Baking Line No. 5 Cracker Oven No. 2 consists of a natural gas-fired oven with a design heat input rate of 8.3 MMBtu/hour, which bakes crackers through direct and indirect heating. The maximum fuel usage for the oven is 72.3 million cubic feet of natural gas in any consecutive 12-month period. The cracker processing line No. 2 (Baking Line No. 5) includes a dough fermentation step. The dough is placed in steel troughs and allowed to rise in a warm, moist enclosure (referred to as proofing) for approximately 4 hours. After fermentation, the dough is processed (rolled and cut int shapes) just prior to baking in a natural gas fired oven. The VOC emitted from the baking line during the baking is routed to the atmosphere through a regenerative thermal oxidizer (RTO). The thermal oxidizer is a natural gas fired unit with a maximum heat input of 1.286 MMBtu per hour and a minimum control efficiency of 95%. The thermal oxidizer has a volatile organic compounds (VOC) emissions limit of 12.9 TPY for the purpose of avoiding Prevention of Significant Deterioration permitting requirements (The combined potential VOC emissions from baking line No. 5 are 258 tons per year (TPY) before the thermal oxidizer). The facility is required to maintain a minimum residence time, a minimum operating temperature and a minimum destruction and removal efficiency (DRE) for the RTO (See Specific Conditions below) to ensure compliance. The thermal oxidizer's operating temperature is continuously monitored and recorded The thermal oxidizer is subject to the Compliance Assurance Monitoring requirements of 40 CFR 64 and 62-213.440(4)(b)4., F.A.C.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity - The maximum process/operation rate for Baking Line No. 5 (Cracker Oven No. 2) is 5,000 lbs/hour (monthly average basis) of product and 21,900 tons of product in any consecutive 12-month period.
[Rules 62-4.160(2), 62-210.200, F.A.C., Definition – (PTE); Construction Permit No. 1050174-006-AC]

A.2. Restricted Operation - The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(1) & (3) and 62-210.200 (Definitions – Potential to Emit (PTE)), F.A.C.]

EMISSIONS LIMITATIONS AND STANDARDS

A.3. Total Volatile Organic Compound (VOC) - Total VOC emissions from the stack of the regenerative thermal oxidizer (RTO) of this emission unit shall not exceed 12.9 (expressed in ethanol) tons in any consecutive 12-month period.
[Rule 62-210.200, F.A.C. – Definitions (PTE); Construction Permit No. 1050174-006-AC]

A4. 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, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity).

[Rule 62-296.320(4)(b)1., F.A.C.]
{Permitting Note: During normal operation of the regenerative thermal oxidizer, the exhaust is expected to have no visible emissions (i.e., 5% opacity or less)}

OPERATION AND MONITORING STANDARDS

A.5. The Regenerative Thermal Oxidizer (RTO) is limited as follows:

A. The RTO control shall be in operation during the leavened product baking.

B. The minimum residence time is 0.33 second.

C. When producing leavened product, the minimum operating temperature must not drop below 1,600°F as measured by the higher of one of the following sensor outputs:

1. The average of two thermocouples located in the RTO burner combustion chamber
2. The Media A thermocouple reading
3. The Media B thermocouple reading

D. The minimum destruction and removal efficiency (DRE) is 95% when a leavened product is in the oven.

[Rule 62-210.200, F.A.C. – Definitions (PTE); Construction Permit No. 1050174-006-AC]

COMPLIANCE TESTING REQUIREMENTS

A.6. Initial Compliance Tests - The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for VOC and VE. The initial tests shall be conducted no later than 60 days after initial operation of the emissions unit after the completion of the modifications.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

A.7. Compliance Tests after Initial Testing - This emission unit shall be tested for the VOC destruction efficiency, residence time, and visible emissions at least 270 days prior to and no more than 365 days prior to the expiration date of the facility's Title V Operation Permit. The test reports shall be submitted to the Compliance Authority of the Department's Southwest District Office within 45 days of testing.
[Rules 62-297.310(7), 62-297.310(8)(b), and 62-4.070(3), F.A.C.; Construction Permit No. 1050174-006-AC]

A.8. Compliance Test Requirements – Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.9. Compliance Test Method(s) - Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
1-4	Traverse points, velocity and flow rate, gas analysis, and moisture content
9	Visual Determination of the Opacity of Emissions from Stationary Sources

25A	Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer

The above methods are described in 40 CFR 60, Appendix A, and 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]

MONITORING REQUIREMENTS

A.10. Temperature Measurement – When baking a leavened product, the permittee shall operate and maintain a monitor to measure the combustion chamber temperature of the Regenerative Thermal Oxidizer. The temperature measurements are recorded using a data acquisition and handling system (DAHS). A strip chart recorder is used simultaneously as a back-up recording device. In the event that the primary and back-up methods of temperature recording are not available and the oven is being used to produce leavened product, the facility shall notify the Department within 24 hours and shall manually record the temperature of the RTO using the temperature display located at the oven exit operator control screen once every 30 minutes using the temperature display located at the oven exit operator control screen.
[Rules 62-296.320(1)(a) and 62-4.070(3), F. A. C.; Construction Permit 1050174-006-AC]

NOTIFICATION REQUIREMENTS

A.11. Test Notification - The permittee shall notify the Compliance Authority in writing at least 30 days prior to the date on which each formal compliance test is to begin. 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 the telephone number of the person conducting the test.
{*Permitting Note: The notification should also include the relevant emissions unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}
[40 CFR 60.8(d)]

A.12. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 016 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

A13. Operation and Maintenance Plan (O&M Plan) – A detailed revised site-specific Operation and Maintenance plan for Baking Line No. 5's RTO shall be submitted to the Air Compliance Section of the Department's Southwest District Office within 45 days of the RTO's initial compliance testing (see Specific Condition Nos. A.5. & A6).
[Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

A.14. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

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

{Permitting Note - EU No. 016 remains subject to all valid conditions contained in the current Title V Air Operation permit.}