



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT GOVERNOR

CARLOS LOPEZ-CANTERA LT. GOVERNOR

HERSCHEL T. VINYARD JR. SECRETARY

NOTICE OF CHANGE OF THE TITLE V AIR OPERATION PERMIT'S EXPIRATION DATE AND FINAL TITLE V AIR OPERATION PERMIT RENEWAL

In the Matter of an Application for Permit by:

Pepperidge Farm, Inc.
2222 Interstate Drive
Lakeland, Florida 33805

Responsible Official:

Mr. Sam Morrone, Plant Manager

Permit Nos. 1050174-009-AV (current permit)
1050174-012-AV (renewal permit)
Lakeland Facility
Title V Air Operation Permit Revision/Renewal
Polk County

This is a notification that the Florida Department of Environmental Protection Southwest District (permitting authority) is changing the expiration date of the current Title V Air Operation Permit, No. 1050174-009-AV, while simultaneously issuing the FINAL Title V Air Operation Permit Renewal, No. 1050174-012-AV. The date and time that both permitting actions are effective are September 24, 2014, at 12:00 a.m. These changes in the current Title V Air Operation Permit's expiration date and the renewal of the Title V Air Operation Permit are based on your request (application) received on May 09, 2014.

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.

Handwritten signature of Kelley M. Boatwright in blue ink.

Kelley M. Boatwright
Permitting & Waste Cleanup Program Administrator
Southwest District

KMB/qn/admin

CERTIFICATE OF SERVICE

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

Mr. Sam Morrone, Pepperidge Farm, Inc.: sam_morrone@pepperidgefarm.com

Mr. Iman Jones, Pepperidge Farm, Inc.: iman_jones@pepperidgefarm.com

Mr. William Straub, P.E., all4inc. (wstraub@all4inc.com)

Mr. Neal Lebo, all4inc. (nlebo@all4inc.com)

Ms. Daniel D. Henry (daniel.d.henry@dep.state.fl.us)

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)

9/24/2014
(Date)

In addition, this NOTICE OF CHANGE OF THE TITLE V AIR OPERATION PERMIT'S EXPIRATION DATE AND FINAL TITLE V AIR OPERATION PERMIT RENEWAL (including the FINAL Title V Air Operation Permit package) was posted electronically on DEP Darm_Common drive and an email notification was sent to Barbara Friday [Barbara.Friday@dep.state.fl.us] for posting with the U.S. EPA Region 4 Office.

FINAL DETERMINATION

PERMITTEE

Pepperidge Farm, Inc.
2222 Interstate Drive
Lakeland, FL 33805

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Air and Solid Waste Permitting
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-7600

PROJECT

Title V Air Operation Permit Revision/Renewal No. 1050174-012-AV
Lakeland Facility

The main purpose of this project is to incorporate the conditions of the construction permit No. 1050174-010-AC and to renew the current Title V Air Operation Permit No. 1050174-009-AV.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Title V Air Operation Permit package on 7/22/2014. The applicant published the Public Notice of Intent to Issue Air Permit in the Lakeland Ledger on 8/9/2014. The Department received the proof of publication on 8/13/2014. A proposed permit was issued for EPA review on 8/9/2014.

COMMENTS

No comments were received from the applicant, the public, or the EPA Region 4 Office.

CONCLUSION

No changes were made to the draft/proposed permit. The permitting authority hereby issues the FINAL Permit, with no changes.

Pepperidge Farm, Inc.
Lakeland Facility
Facility ID No. 1050174
Polk County

Title V Air Operation Permit Revision & Renewal

Permit No. 1050174-012-AV
(Revision & Renewal of Title V Air Operation Permit No. 1050174-009-AV)



Permitting Authority:

State of Florida
Department of Environmental Protection
Air and Solid Waste Permitting, Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: (813) 470-5700
Fax: (813) 470-5996

Compliance Authority:

State of Florida
Department of Environmental Protection
Compliance Assurance Program, Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: (813) 470-5700
Fax: (813) 470-5995

Title V Air Operation Permit Revision & Renewal

Permit No. 1050174-012-AV

Table of Contents

<u>Section</u>	<u>Page Number</u>
I. Facility Information.	
A. Facility Description.	2
B. Summary of Emissions Units.	2
C. Applicable Regulations.	3
II. Facility-wide Conditions.	4
III. Emissions Units and Conditions.	
A. EU No. 001 - Flour Silo S-2	6
EU No. 002 - Flour Silo S-3	
EU No. 003 - Flour Silo S-4	
EU No. 004 - Flour Silo S-5	
EU No. 005 - Flour Silo S-51	
EU No. 006 - Flour Silo S-52	
EU No. 007 - Flour Silo S-53	
B. EU No. 008 – Biscuit Sugar Silo S-54	9
C. EU No. 009 – Baking Line No. 1 – Cracker Oven No. 1	12
EU No. 010 – Baking Line No. 2 – Bread Oven No. 1	
EU No. 011 – Baking Line No. 3 – Roll Oven	
D. EU No. 016 – Baking Line No. 5 – Cracker Oven No. 2	14
E. EU No. 017 – Baking Line No. 6 – Bread Oven No. 2	19
IV. Appendices.	24
Appendix A, Glossary.	
Appendix CAM, Compliance Assurance Monitoring Plan	
Appendix I, List of Insignificant Emissions Units and/or Activities	
Appendix RR, Facility-wide Reporting Requirements	
Appendix TR, Facility-wide Testing Requirements	
Appendix TV, Title V General Conditions	
Referenced Attachments.	At End
Statement of Basis	
Table H, Permit History	
Tables 1 & 2, Summary of Air Pollutant Standards and Terms & Compliance Requirements	

FINAL PERMIT

PERMITTEE:

Pepperidge Farm, Inc.
2222 Interstate Drive
Lakeland, Florida 33805

Permit No. 1050174-012-AV
Lakeland Facility
Facility ID No. 1050174
Title V Air Operation Permit
Revision & Renewal

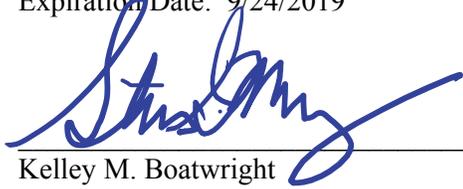
The purpose of this permit is to revise & renew the Title V air operation permit No. 1050174-009-AV for the above referenced facility. The Title V air operation revision is to incorporate the provisions of Air construction permit No. 1050174-010-AC. Revisions to the permit 1050174-009-AV are listed as below:

1. Add a new microwave heating unit to the existing Baking Line No. 5, Cracker Oven No. 2, EU No. 016.
2. Add a new chiller for the new microwave heating unit in EU No. 016.
3. Add a new product conveyor to EU No. 016.
4. Add a new seasoning system to EU No. 016

The existing Pepperidge Farm, Inc. is located in Polk County at 2222 Interstate Drive, Lakeland, Florida. UTM Coordinates are: Zone 17, 403.64 East and 3105.80 North. Latitude is: 28°04'26.8" North; and, Longitude is: 81°58'50.2" West.

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

Effective Date: 9/24/2014
Renewal Application Due Date: 2/11/2019
Expiration Date: 9/24/2019

for 

Kelley M. Boatwright
Permitting & Waste Cleanup Program Administrator
Southwest District

KMB/qn/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

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-4.

Based on the Title V Air Operation Renewal application received May 09, 2014, this facility is a major source of hazardous air pollutants (HAPs). This facility is classified as a PSD major facility.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Flour Silo S-2
002	Flour Silo S-3
003	Flour Silo S-4
004	Flour Silo S-5
005	Flour Silo S-51
006	Flour Silo S-52
007	Flour Silo S-53
008	Biscuit Sugar Silo S-54
009	Baking Line No. 1 – Cracker Oven No. 1
010	Baking Line No. 2 – Bread Oven No. 1
011	Baking Line No. 3 – Roll Oven
016	Baking Line No. 5 – Cracker Oven No. 2
017	Baking Line No. 6 – Bread Oven No. 2

SECTION I. FACILITY INFORMATION.

Subsection C. Applicable Regulations.

Based on the Title V air operation permit revision and renewal application received May 9, 2014, this facility is a major source of hazardous air pollutants (HAP). The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<i>Federal Regulations</i>	
40 CFR 64, Compliance Assurance Monitoring	016 & 017
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

SECTION II. FACILITY-WIDE CONDITIONS.

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

FW1. Appendices - The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable - Objectionable Odor Prohibited**. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

FW4. General Visible Emissions - No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Portable “shop-vac” vacuum collectors and normal “good housekeeping procedures” shall be used as needed.
- b. Facility roadways and parking areas are paved.
- c. Flour and sugar storage and handling equipment are enclosed.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1050174-008-AC.]

Annual Reports and Fees

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

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection’s Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP’s Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of

SECTION II. FACILITY-WIDE CONDITIONS.

using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.}

- FW7.** Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]
- FW8.** Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:
- Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: <https://cdx.epa.gov>. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: <http://www.epa.gov/osweroel/content/rmp/index.htm>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
 - Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

Recordkeeping and Reporting Requirements

- FW9.** Records Update. At a minimum, all records and logs required by this permit shall be updated monthly, by the end of the following month.
[Rule 62-4.070(3), F.A.C.]

IMPORTANT NOTES TO PERMITTEE:

Permit Renewal - see Appendix TV, Condition No. TV18.

(Note - Renewal application is due 225 days prior to expiration date of this permit.)

Title V Semi-Annual Monitoring Reports - see Appendix RR, Condition No. RR4.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001 - 007 – Flour Silos

The specific conditions in this section apply to the following emissions units (EUs):

EU ID No.	Brief Description
-001	Flour Silo S-2
-002	Flour Silo S-3
-003	Flour Silo S-4
-004	Flour Silo S-5
-005	Flour Silo S-51
-006	Flour Silo S-52
-007	Flour Silo S-53

Each of the flour silos can be used to store any one of the following types of flour: short patent flour, high gluten flour, whole-wheat flour, all-purpose flour, and cracker flour. Silos are loaded pneumatically from delivery trucks at a maximum silo-loading rate of 60,000 pounds per hour. Particulate emissions from silo loading operations are each controlled by identical Reimelt Jet Filter Model JF 1268-52 baghouse collectors mounted on the top of each silo. The baghouse collectors have a rated airflow rate of 682 acfm and are each vented to an enclosure on top of the silo which then exhausts to the atmosphere through two vents.

The above paragraph is descriptive only, and does not represent enforceable conditions.

{Permitting note(s): These emissions units are regulated under Rule 62-296.700, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable silo loading rate is as follows:

EU ID Nos.	Silo Loading Rate (lbs/hour)
001-007	60,000

[Rules 62-4.160(2), 62-204.800, 62-210.200 (Potential to Emit); and, Construction Permit Nos. AC-243938 and 1050174-008-AC.]

A.2. Hours of Operation - The hours of operation for each of these emissions units shall not exceed 416 hours per calendar year. Silo operation is defined as any period that flour is being loaded into the silo. [Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 1050174-008-AC]

A.3. Emissions Unit Operating Rate Limitation After Testing - See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001 - 007 – Flour Silos

Emission Limitations and Standards

(Permitting Note - The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

- A.4. Particulate Matter (PM/PM₁₀) Emissions Limitation** - Particulate matter emissions from each of the flour silos shall not exceed 0.63 pounds per hour, 0.13 tons per year.
[Rule 62-296.700(2)(a) and (c), F.A.C.; Construction Permit Nos. AC53-243938 and 1050174-008-AC]

- A.5. Alternate to PM/PM₁₀ Emissions Limitation** - Due to the expense and complexity of conducting a stack test on a minor source of particulate matter, and because each of these storage silos is equipped with a baghouse emission control device, the Department, pursuant to the authority granted under Rule 62-297.620(4), F.A.C., hereby establishes a visible emission limitation not to exceed an opacity of 5% from each silo’s baghouse exhaust in lieu of a particulate stack test and a 20% opacity standard.
[Rule 62-297.620(4), F.A.C.]

Test Methods and Procedures

(Permitting Note - The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

- A.6. Compliance Test Methods** - Required compliance tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is 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.
[Rule 62-297.401, F.A.C.]

- A.7. Common Testing Requirements** - Unless otherwise specified, compliance tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.
[Rule 62-297.310, F.A.C.]

- A.8. Compliance Tests Prior To Renewal** - Compliance tests for each of the silo baghouse shall be performed for VE once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions A.4. The permittee shall visually inspect each baghouse collector on a quarterly basis to ensure that the collectors are in proper working condition.
[Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001 - 007 – Flour Silos

Recordkeeping and Reporting Requirements

- A.9.** Compliance Testing Recordkeeping - The permittee shall submit a statement of the silo being loaded, type of material being loaded and the silo filling rate (pounds per hour) as a part of the compliance test report. In addition, a copy of the silo filling records for the day of the test shall be submitted with each compliance test report. Failure to submit the process (filling) rate, or operating at conditions which do not reflect the normal operating conditions, may invalidate the test and fail to provide reasonable assurance of compliance.
[Rule 62-4.070(3), F.A.C.; Construction Permit Nos. AC53-243938 and 1050174-008-AC]
- A.10.** Silo Recordkeeping - In order to document compliance with the silo filling rate and hours of operation limitations of Conditions A.1 and A.2, the permittee shall maintain a record of the silo filling operations. The records of silo filling shall be maintained for all periods of silo filling and shall show the following:
- the date;
 - the silo being filled (silo ID number);
 - material being loaded to the silo (type of flour);
 - start and end time of silo filling operation, and resulting silo filling (operating) time (hours);
 - quantity of material loaded (pounds);
 - material loading rate (pounds per hour);
 - on a monthly basis, the cumulative calendar year operating hours for each silo.
- [Rule 62-4.070(3), F.A.C.; Construction Permit Nos. AC53-243938 and 1050174-008-AC]
- A.11.** Maintenance of Records - The permittee shall maintain a record of the date of inspection (ref. condition A.8.), signature of the person performing the inspection, and any corrective action taken. The record shall include a list of spare parts available on site.
- A.12.** Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]
- A.13.** Records Update. At a minimum, all records and logs required by this section shall be updated monthly, by the end of the following month.
[Rule 62-4.070(3), F.A.C.]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection B. Emissions Unit No. 008 – Biscuit Sugar Silo S-54

The specific conditions in this section apply to the following emissions unit (EU):

EU ID No.	Brief Description
-008	Biscuit Sugar Silo S-54

The biscuit sugar silo is loaded pneumatically from delivery trucks at a maximum silo loading rate of 50,000 pounds per hour. Particulate emissions from silo loading operations are controlled by a Reimelt Jet Filter Model JF 1268-52 baghouse collector mounted on the top of the silo. The baghouse collector has a rated air flow rate of 682 acfm and is vented to an enclosure on top of the silo which then exhausts to the atmosphere through two vents.

The above paragraph is descriptive only, and does not represent enforceable conditions.

{Permitting note(s): These emissions units are regulated under Rule 62-296.700, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter.}

Essential Potential to Emit (PTE) Parameters

- B.1.** Capacity - The maximum silo loading rate for the biscuit sugar silo shall not exceed 50,000 pounds per hour of flour.
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE); Construction Permit No. AC53-243938]
- B.2.** Hours of Operation - The hours of operation for this emissions unit shall not exceed 260 hours per calendar year. Silo operation is defined as any period that sugar is being loaded into the silo.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. AC53-243938]
- B.3.** Emissions Unit Operating Rate Limitation After Testing - See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

(Permitting Note - The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

- B.4.** Particulate Matter (PM/PM₁₀) Emissions Limitation - Particulate matter emissions from each of the flour silos shall not exceed 0.62 pounds per hour, 0.08 tons per year.
[Rule 62-296.700(2)(a) and (c), F.A.C.; Construction Permit No. AC53-243938]
- B.5.** Alternate to PM/PM₁₀ Emissions Limitation - Due to the expense and complexity of conducting a stack test on a minor source of particulate matter, and because each of these storage silos is equipped with a baghouse emission control device, the Department, pursuant to the authority granted under Rule 62-297.620(4), F.A.C., hereby establishes a visible emission limitation not to exceed an opacity of 5% from each silo’s baghouse exhaust in lieu of a particulate stack test and a 20% opacity standard.
[Rule 62-297.620(4), F.A.C.]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection B. Emissions Unit No. 008 – Biscuit Sugar Silo S-54

Test Methods and Procedures

(Permitting Note - The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

- B.6. Compliance Test Methods** - Required compliance tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is 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. [Rule 62-297.401, F.A.C.]

- B.7. Common Testing Requirements** - Unless otherwise specified, compliance tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

- B.8. Compliance Tests Prior To Renewal** - Compliance tests for each of the silo baghouse shall be performed for VE once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions B.4. The permittee shall visually inspect each baghouse collector on a quarterly basis to ensure that the collectors are in proper working condition. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

- B.9. Compliance Testing Recordkeeping** - The permittee shall submit a statement of the silo being loaded, type of material being loaded and the silo filling rate (pounds per hour) as a part of the compliance test report. In addition, a copy of the silo filling records for the day of the test shall be submitted with each compliance test report. Failure to submit the process (filling) rate, or operating at conditions which do not reflect the normal operating conditions, may invalidate the test and fail to provide reasonable assurance of compliance. [Rule 62-4.070(3), F.A.C.; Construction Permit No. AC53-243938]

- B.10. Silo Recordkeeping** - In order to document compliance with the silo filling rate and hours of operation limitations of Conditions B.1 and B.2, the permittee shall maintain a record of the silo filling operations. The records of silo filling shall be maintained for all periods of silo filling and shall show the following:
- a. the date;
 - b. the silo being filled (silo ID number);
 - c. material being loaded to the silo (type of flour);
 - d. start and end time of silo filling operation, and resulting silo filling (operating) time (hours);
 - e. quantity of material loaded (pounds);
 - f. material loading rate (pounds per hour);
 - g. on a monthly basis, the cumulative calendar year operating hours for each silo.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. AC53-243938]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection B. Emissions Unit No. 008 – Biscuit Sugar Silo S-54

- B.11.** Maintenance of Records - The permittee shall maintain a record of the date of inspection (ref. condition B.8.), signature of the person performing the inspection, and any corrective action taken. The record shall include a list of spare parts available on site.
- B.12.** Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]
- B.13.** Records Update. At a minimum, all records and logs required by this section shall be updated monthly, by the end of the following month.
[Rule 62-4.070(3), F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection C. Emission Unit Nos. 009, 010 and 011

The specific conditions in this section apply to the following emissions units (EUs):

EU No.	Brief Description
-009	Baking Line No. 1 – Cracker Oven No. 1
-010	Baking Line No. 2 – Bread Oven No. 1
011	Baking Line No. 3 – Roll Oven

Baking Line Nos. 1, 2, and 3 consist of natural gas-fired ovens each with a design heat input rate of 12.37 MMBtu per hour, which bake bread, rolls, and crackers through direct and indirect heating. Also included are pre-bake and post-bake operations, such as mixing, dividing, proofing, de-panning, cooling, slicing and packaging.

The cracker processing line No. 1 (Baking Line No. 1) includes a dough fermentation step. The mixed dough is placed in a stainless steel trough and allowed to rise in a warm, moist enclosure for one to four hours. The dough is then processed (rolled and cut into shape) just prior to baking in a natural gas fired oven.

The mixed dough for the bread and roll lines (Baking Line Nos. 2 and 3) is delivered to forms and set in baking pans. The dough rises in proofing boxes for up to an hour before baking. The bread and roll baking ovens are natural gas direct-fired ovens.

The above paragraphs are descriptive only, and do not represent enforceable conditions.

{Permitting note: This emissions unit is regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

Essential Potential to Emit (PTE) Parameters

- C.1. Capacity** - The following capacities are listed as representing maximum capacities for the purpose of evaluating PTE (Potential to Emit).
- a. The maximum process/operation rate for Baking Line No. 1 - Cracker Oven No. 1 is 11,515 tons of cracker product in any consecutive 12 month period.
 - b. The maximum process/operation rate for Baking Line No. 2 - Bread Oven No. 1 is 35,040 tons of bread product in any consecutive 12 month period.
 - c. The maximum process/operation rate for Baking Line No. 3 - Roll Oven is 18,396 tons of roll product in any consecutive 12 month period.
 - d. The maximum fuel usage for each of the 3 direct natural gas-fired ovens is 108.3 million cubic feet of natural gas in any consecutive 12-month period.
- [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)]

- C.2. Methods of Operation - (i.e., Fuels)**
The direct gas-fired baking line ovens shall be fired with natural gas only.
[Rule 62-4.160(2), F.A.C., and Rule 62-213.410, F.A.C.]

- C.3. Hours of Operation** – The emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection C. Emission Unit Nos. 009, 010 and 011

Recordkeeping and Reporting Requirements

- C.4.** The permittee shall keep monthly logs of the following parameters to document compliance with the requirement of the permit (ref. Appendix TV, item TV30).
- a. Emission Unit ID and each baking line ID Number
 - b. Operating hours for each baking line;
 - c. Pounds of products for each baking line;
 - d. Quantity of natural gas burned for each baking line;
 - e. VOCs and Hazardous Air Pollutants (HAPs) emitted from each baking line (tons);
 - f. Total VOCs and Hazardous Air Pollutants (HAPs) emitting from all three (3) baking lines (tons);
- [Rule 62-213.440(1)(b)2.b., F.A.C.]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection D. Emission Unit No. 016

The specific conditions in this section apply to the following emissions unit (EU):

EU No.	Brief Description
-016	Baking Line No. 5 – Cracker Oven No. 2

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 into 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.

A new microwave heating unit, a new chiller for the new microwave heating unit, a new product conveyor and a new seasoning system is added to this emissions unit. The microwave is located in the product line after the vent lines’ routing to the RTO.

Essential Potential to Emit (PTE) Parameters

D.1. 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 Nos. 1050174-006-AC and 1050174-010-AC]

D.2. Methods of Operation -

Fuels – Natural gas is allowed to be burned in this unit.

[Rule 62-213.410, F.A.C.; Applicant’s request in Title V permit application received May 9, 2014; and, Construction Permit Nos. 1050174-006-AC and 1050174-010-AC]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection D. Emission Unit No. 016

- D.3.** Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit Nos. 1050174-006-AC and 1050174-010-AC]
- D.4.** Emissions Unit Operating Rate Limitation After Testing - See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Control Technology

- D.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, and
 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 Nos. 1050174-006-AC and 1050174-010-AC]

Emission Limitations and Standards

(Permitting Note - The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

Unless otherwise specified, the averaging times for Specific Condition No(s). **D.6.-D.7.** are based on the specified averaging time of the applicable test method.

- D.6.** Visible Emissions (VE) Limitation - Visible emissions shall not be equal to or exceed 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 not expected to have visible emissions (i.e., 5% opacity)}
- D.7.** 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 Nos. 1050174-006-AC and 1050174-010-AC]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection D. Emission Unit No. 016

Monitoring of Operations

D.8. CAM Plan - This emissions unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Continuous Monitoring Requirements

D.9. 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 Nos. 1050174-006-AC and 1050174-010-AC]

Test Methods and Procedures

(Permitting Note - The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

D.10. Compliance Test Methods - Required compliance tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-2	Traverse Points, Velocity and Flow Rate
9	Visual Determination of the Opacity of Emissions from Stationary Sources
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

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.

[Rule 62-297.401, F.A.C., Construction Permit Nos. 1050174-006-AC and 1050174-010-AC]

D.11. Common Testing Requirements - Unless otherwise specified, compliance tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. Additionally, the thermal oxidizer shall be tested within 90-100% of the maximum allowable production rate of Cracker Oven No. 2, which is 5,000 lbs/hr. Note, the permittee shall initiate the compliance test on reaching the normal and steady state operation. The permittee shall

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection D. Emission Unit No. 016

record the VOC concentration at inlet and outlet of the regenerative thermal oxidizer (RTO) and air flow-rate (cfm) from the stack of the RTO along with a record of the production rate of Cracker Oven No. 2 for the test period.

[Rule 62-297.310, F.A.C.; Construction Permit No. 1050174-006-AC]

- D.12. Compliance Tests Prior To Renewal** - Compliance tests shall be performed for VE, VOC destruction efficiency and residence time once every 5 years at least 270 days prior to and no more than 365 days prior to the expiration date of this permit. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions D.6. and D.7.
[Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.; Construction Permit Nos. 1050174-006-AC and 1050174-010-AC]

Recordkeeping and Reporting Requirements

- D.13. Compliance Test Records** - Failure to submit the following with any compliance test may invalidate the test and fail to provide reasonable assurance of compliance:
- A copy of the records documenting the average production rate of the cracker oven (lbs/hr) and average air flow rate (cfm) to the thermal oxidizer along with a copy of the record showing VOC destruction rate of the flue gas during the test period.
 - A copy of the thermal oxidizer's temperature records (e.g. continuous temperature strip chart) during the test period.
 - A copy of the logs/records as required by the Specific Condition D.14 for the month the test was conducted.
 - Information required to be provided in the Test Reports as part of the General Compliance Test Requirements as required by Rule 62-297.310(8)(c), F.A.C.
- [Rules 62-4.070(3) and 62-297.310, F.A.C.; Construction Permit No. 1050174-006-AC]

- D.14. Daily and Monthly Logs** - The permittee shall keep a monthly log for the facility to document compliance with the limitations of Specific Condition Nos. D.1. and D.7. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. If any month results in total VOCs emissions being within 10% of its associated allowable emission limit as shown in Specific Condition No. D.7., the monthly log required below shall be then kept daily.

The daily log shall include a cumulative total to demonstrate compliance with the Specific Condition No. D.7. The log shall be retained on file at the facility and shall, at a minimum record the following:

- Facility Name, Facility ID, Emission Unit ID No. (1050174, EU 016) and Description (Cracker Oven No. 2, Baking Line No. 5).
- Month, year, and method used for records (use or purchase).
- Record the monthly quantity, in tons, of product that emits VOC. Calculate and record production rate, lbs/hr.
- Calculate and record the most recent consecutive 12-month period cumulative production rate (in tons per consecutive 12-month period).
- Record the monthly and the most recent consecutive 12-month total quantity, in tons, of total VOC emissions from this emission unit. VOC emission factor before the control device (i.e., RTO) and the RTO destruction efficiency used to calculate emissions shall be those obtained from the most recent stack test unless otherwise required or approved by the Department in writing.
- Record the total operating hours of the Cracker Oven No. 2.
- Record the total operating hours of the RTO.
- Quantity of natural gas burned by this emission unit.

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection D. Emission Unit No. 016

- i. The monthly logs shall be completed by the end of the following month. Daily logs (if required) shall be completed within 7 calendar days. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each material, which includes sufficient information to determine VOC emissions. These records shall be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050174-006-AC]

- D.15.** Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

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

Other Requirements

- D.16.** Operation and Maintenance Plan (O&M Plan) – Baking Line No. 5’s RTO shall be operated and maintained in accordance with the O&M Plan submitted to the Department in September 2008 or subsequent revisions accepted by the Department.

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

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection E. Emission Unit No. 017

The specific conditions in this section apply to the following emissions unit (EU):

EU No.	Brief Description
-017	Baking Line No. 6 – Bread Oven No. 2

Baking Line No. 6 consists of mixing, dough proofing, baking oven, oven emissions control device (a regenerative thermal oxidizer (RTO)) and packaging equipment. The line produces breads which may be either a leavened or unleavened product. Unleavened product does not have any fermentation step and has minimal emissions. The leavened product utilizes active yeast to initiate fermentation, therefore is a source of volatile organic compound (VOC) emissions.

After a leavened product recipe is mixed, the resultant dough is cut into pieces and loaded into baking pans. The dough is then allowed to rise in a warm, moist enclosure (referenced as proofing) for approximately one hour. After fermentation, the baking pans are placed onto a conveyor belt for transporting to the oven. The bread dough then passes through the baking oven on a conveyor in order to bake the bread products. The Bread Oven No. 2 is a Turkington USA oven (Model Number 960). It is a conveyORIZED oven rated at 13,900 pounds of product per hour. The oven is direct-fired by 81 natural gas fired burners. Each burner is rated at 85,000 Btu/hr. The oven is rated at a maximum heat input of 6.89 MMBtu/hr. The oven is operated at a negative pressure with respect to the baking room.

The oven gases, which consist of moisture, fermentation gases and products of combustion from the oven burners, are vented through six oven exhaust stacks. The oven exhaust stacks are combined into a common manifold which is ducted to a RTO to control VOC emissions. The RTO is equipped with a single 38-foot high stack. The RTO is a Megtec System, Model Number MIL040-95 control unit. The RTO is designed to achieve a minimum volatile organic compound (VOC) destruction and removal efficiency (DRE) of 95% when operated at normal and steady-state operation. The RTO is fired with natural gas at a maximum heat input rate of 0.96 MMBtu/hr. Air and flue gas in the RTO's combustion chamber has an approximate flowrate of 3,500 acfm (the RTO design flowrate is 4,000 dscfm), a minimum residence time of 0.33 second and the combustion chamber of the RTO is maintained at a minimum operating temperature of 1,600 degrees Fahrenheit (°F) during production of leavened product.

The oven is equipped with a safety system to vent the oven prior to starting the oven burners. The purge system includes dampers and a separate oven exhaust "bypass" stack. Oven purging is a safety requirement to avoid the buildup of natural gas or other combustible gases in the ovens and the ducts in the event of an oven shutdown, process interruption, or burner malfunction.

When making an unleavened product, the oven exhaust may also be ducted to the RTO or alternatively the RTO may be bypassed using the separate by-pass stack. During prolonged periods of unleavened production or oven down time, the RTO may be operated in idle mode or turned off.

Essential Potential to Emit (PTE) Parameters

- E.1.** Capacity – The maximum process/operation rate for Bread Oven No. 2 (Baking Line No. 6) is 13,900 lbs/hour of product (monthly average basis) and 60,882 tons of product in any consecutive 12-month period.
[Rules 62-4.160(2) and 62-210.200 – Definition (PTE), F.A.C.; Construction Permit 1050174-008-AC]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection E. Emission Unit No. 017

E.2. Methods of Operation -

Fuels – Natural gas is allowed to be burned in this unit.

[Rule 62-213.410, F.A.C.; and Applicant's request in Title V permit application received May 9, 2014]

E.3. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).

[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 1050174-008-AC]

E.4. Emissions Unit Operating Rate Limitation After Testing - See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.

[Rule 62-297.310(2), F.A.C.]

Control Technology

E.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 (Level 3, 2 or 1) thermocouple reading, and
 3. The Media B (Level 3, 2, or 1) 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. 1050174-008-AC]

Emission Limitations and Standards

(Permitting Note - The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

Unless otherwise specified, the averaging times for Specific Condition No(s). **E.6.-E.7.** are based on the specified averaging time of the applicable test method.

E.6. Visible Emissions (VE) Limitation - Visible emissions shall not be equal to or exceed 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 not expected to have visible emissions (i.e., 5% opacity)}

E.7. Total Volatile Organic Compound (VOC) - Total VOC emissions from the stack of the regenerative thermal oxidizer (RTO) of this emission unit shall not exceed 5.82 (expressed in ethanol) tons in any consecutive 12-month period.

(Permitting Note: Fugitive VOC emissions from Baking Line No. 6 is estimated at one (1) ton per year)

[Rule 62-210.200, F.A.C. – Definitions (PTE); Construction Permit No. 1050174-008-AC]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection E. Emission Unit No. 017

Monitoring of Operations

E.8. CAM Plan - This emissions unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Continuous Monitoring Requirements

E.9. 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 1050174-008-AC]

Test Methods and Procedures

(Permitting Note - The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

E.10. Compliance Test Methods - Required compliance tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-2	Traverse Points, Velocity and Flow Rate
9	Visual Determination of the Opacity of Emissions from Stationary Sources
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

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.

[Rule 62-297.401, F.A.C., Construction Permit No. 1050174-008-AC.]

E.11. Common Testing Requirements - Unless otherwise specified, compliance tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. Additionally, the thermal oxidizer shall be tested within 90-100% of the maximum allowable production rate of Bread Oven No. 2, which is 13,900 lbs/hr. Note, the permittee shall initiate the compliance test when a leavened product is placed in the oven. The permittee shall record the production rate of Bread Oven No. 2 for the test period. [Rule 62-297.310, F.A.C.; Construction Permit 1050174-008-AC]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection E. Emission Unit No. 017

- E.12. Compliance Tests Prior To Renewal** - Compliance tests shall be performed for VE, VOC destruction efficiency and residence time once every 5 years at least 270 days prior to and no more than 365 days prior to the expiration date of this permit. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions E.6. and E.7. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.; Construction Permit No. 1050174-008-AC]

Recordkeeping and Reporting Requirements

- E.13. Compliance Test Records** - Failure to submit the following with any compliance test may invalidate the test and fail to provide reasonable assurance of compliance:
- A copy of the records documenting the average production rate of the bread oven (lbs/hr) and average air flow rate (cfm) to the thermal oxidizer along with a copy of the record showing VOC destruction rate of the flue gas during the test period.
 - A copy of the thermal oxidizer's temperature records (e.g. continuous temperature strip chart) during the test period.
 - A copy of the logs/records as required by the Specific Condition E.14 for the month the test was conducted.
 - Information required to be provided in the Test Reports as part of the General Compliance Test Requirements as required by Rule 62-297.310(8)(c), F.A.C.
- [Rules 62-4.070(3) and 62-297.310, F.A.C.; Construction Permit No. 1050174-008-AC]

- E.14. Daily and Monthly Logs** - The permittee shall keep a monthly log for the facility to document compliance with the limitations of Specific Condition Nos. E.1. and E.7. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. If any month results in total VOCs emissions being within 10% of its associated allowable emission limit as shown in Specific Condition No. E.7., the monthly log required below shall be then kept daily.

The daily log shall include a cumulative total to demonstrate compliance with the Specific Condition No. E.7. The log shall be retained on file at the facility and shall, at a minimum record the following:

- Facility Name, Facility ID, Emission Unit ID No. (1050174, EU 017) and Description (Bread Oven No. 2, Baking Line No. 6).
- Month, year, and method used for records (use or purchase).
- Record the monthly quantity, in tons, of product that emits VOC. Calculate and record production rate, lbs/hr.
- Calculate and record the most recent consecutive 12-month period cumulative production rate (in tons per consecutive 12-month period).
- Record the monthly and the most recent consecutive 12-month total quantity, in tons, of total VOC emissions from this emission unit. VOC emission factor before the control device (i.e., RTO) and the RTO destruction efficiency used to calculate emissions shall be those obtained from the most recent stack test unless otherwise required or approved by the Department in writing.
- Record the total operating hours of the Bread Oven No. 2.
- Record the total operating hours of the RTO.
- Quantity of natural gas burned by this emission unit.
- The monthly logs shall be completed by the end of the following month. Daily logs (if required) shall be completed within 7 calendar days. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each material, which includes sufficient information to determine VOC emissions. These records shall be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050174-008-AC]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS.

Subsection E. Emission Unit No. 017

- E.15.** Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

Other Requirements

- E.16.** Operation and Maintenance Plan (O&M Plan) – Baking Line No. 5’s RTO shall be operated and maintained in accordance with the O&M Plan submitted to the Department in August 2007 or subsequent revisions accepted by the Department.
[Rule 62-4.070(3), F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

Appendix CAM, Compliance Assurance Monitoring Plan

Appendix I, List of Insignificant Emissions Units and/or Activities

Appendix RR, Facility-wide Reporting Requirements

Appendix TR, Facility-wide Testing Requirements

Appendix TV, Title V General Conditions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis

Table H, Permit History

Table 1 & 2, Summary of Air Pollutant Standards and Terms & Compliance Requirements

APPENDIX A

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

Abbreviations and Acronyms:

° F: degrees Fahrenheit	ID: identification
acfm: actual cubic feet per minute	ISO: International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals pressure.)
AOR: Annual Operating Report	kPa: kilopascals
ARMS: Air Resource Management System (Department's database)	LAT: Latitude
BACT: best available control technology	lb: pound
Btu: British thermal units	lbs/hr: pounds per hour
CAA: Clean Air Act	LONG: Longitude
CAAA: Clean Air Act Amendments of 1990	MACT: maximum achievable technology
CAM: compliance assurance monitoring	mm: millimeter
CEMS: continuous emissions monitoring system	MMBtu: million British thermal units
cfm: cubic feet per minute	MSDS: material safety data sheets
CFR: Code of Federal Regulations	MW: megawatt
CO: carbon monoxide	NESHAP: National Emissions Standards for Hazardous Air Pollutants
COMS: continuous opacity monitoring system	NO_x: nitrogen oxides
DARM: Division of Air Resources Management	NSPS: New Source Performance Standards
DCA: Department of Community Affairs	O&M: operation and maintenance
DEP: Department of Environmental Protection	O₂: oxygen
Department: Department of Environmental Protection	ORIS: Office of Regulatory Information Systems
dscfm: dry standard cubic feet per minute	OS: Organic Solvent
EPA: Environmental Protection Agency	Pb: lead
ESP: electrostatic precipitator (control system for reducing particulate matter)	PM: particulate matter
EU: emissions unit	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
F.A.C.: Florida Administrative Code	PSD: prevention of significant deterioration
F.D.: forced draft	psi: pounds per square inch
F.S.: Florida Statutes	PTE: potential to emit
FGR: flue gas recirculation	RACT: reasonably available control technology
Fl: fluoride	RATA: relative accuracy test audit
ft²: square feet	RMP: Risk Management Plan
ft³: cubic feet	RO: Responsible Official
gpm: gallons per minute	SAM: sulfuric acid mist
gr: grains	scf: standard cubic feet
HAP: hazardous air pollutant	scfm: standard cubic feet per minute
Hg: mercury	SIC: standard industrial classification code
I.D.: induced draft	

APPENDIX A

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

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

SOA: Specific Operating Agreement

SO₂: sulfur dioxide

TPH: tons per hour

TPY: tons per year

UTM: Universal Transverse Mercator coordinate system

VE: visible emissions

VOC: volatile organic compounds

x: By or times

Citations:

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

Code of Federal Regulations:

Example: [40 CFR 60.334]

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

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

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

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

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

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

Permit Numbers:

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

APPENDIX A

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

Where:

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

Example: PSD-FL-185

PA95-01

AC53-208321

Where:

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

Pepperidge Farms, Inc. – Lakeland Facility
Facility ID #: 1050174

APPENDIX CAM

Compliance Assurance Monitoring Requirements

Compliance Assurance Monitoring Requirements

Pursuant to Rule 62-213.440(1)(b)1.a., F.A.C., the CAM plan that is included in this appendix contains the monitoring requirements necessary to satisfy 40 CFR 64. Conditions 1. – 17. are generic conditions applicable to all emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the attached tables, as submitted by the applicant and approved by the Department.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan, as submitted by the applicant, is approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]
2. The attached CAM plan include the following information:
 - (i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
 - (ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
 - (iii) The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.[40 CFR 64.6(c)(1)]
3. The attached CAM plan describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 9.**) and reporting exceedances or excursions (see **CAM Conditions 10. – 14.**).
[40 CFR 64.6(c)(2)]
4. The permittee is required to conduct the monitoring specified in the attached CAM plan and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5. - 17.**).
[40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of operation. The owner or operator shall conduct the monitoring required under this appendix upon the effective date of this Title V permit.
[40 CFR 64.7(a)]
6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR 64.7(b)]
7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is

operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

8. Response to excursions or exceedances.

- a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions, if allowed by this permit). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of need for improved monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Based on the results of a determination made under **CAM Condition 8.a.**, above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

[40 CFR 64.8(a)]

11. Elements of a QIP:

- a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
- b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
 - (i) Improved preventive maintenance practices.
 - (ii) Process operation changes.
 - (iii) Appropriate improvements to control methods.
 - (iv) Other steps appropriate to correct control performance.
 - (v) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(i)** through **(iv)**, above).

[40 CFR 64.8(b)]

- 12.** If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

[40 CFR 64.8(c)]

- 13.** Following implementation of a QIP, upon any subsequent determination pursuant to **CAM Condition 8.b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

- a. Failed to address the cause of the control device performance problems; or
- b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[40 CFR 64.8(d)]

- 14.** Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[40 CFR 64.8(e)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General reporting requirements.

- a. On and after the date specified in **CAM Condition 5.** by which the owner or operator must use monitoring that meets the requirements of this appendix, the owner or operator shall submit monitoring reports semi-annually to the permitting authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C.
- b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-213.440(1)(b)3.a., F.A.C., and the following information, as applicable:
 - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

- (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (iii) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10. through 14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR 64.9(a)]

16. General recordkeeping requirements.

- a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62-213.440(1)(b)2., F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10. through 14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

40 CFR 64.10 Savings Provisions.

17. It should be noted that nothing in this appendix shall:

- a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.
- b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.
- c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[40 CFR 64.10]

Pepperidge Farms, Inc. – Lakeland Facility

Emissions Unit 016

**Baking Line No. 5 (Cracker Oven No. 2)
VOC Emissions Controlled By a Thermal Oxidizer**

Monitoring Approach

TABLE 1: MONITORING APPROACH

EMISSION UNIT 016 – REGENERATIVE THERMAL OXIDIZER (RTO)	
<p>I. Indicator</p> <p>Measurement Approach Analytical Devices</p> <p>Monitoring Locations</p>	<p>Regenerative Thermal Oxidizer (RTO) Chamber Temperature. The RTO is operated at no less than 1600⁰F as determined by the higher of the following temperature readings:</p> <ul style="list-style-type: none"> – Average of two (2) combustion chamber thermocouples – Media A Thermocouple reading (One (1) Thermocouple) – Media B Thermocouple reading(One (1) Thermocouple) <hr/> <p>Thermocouple or other pressure/temperature measuring device as appropriate.</p> <hr/> <p>Temperature at the RTO combustion chamber exit.</p>
<p>II. Indicator Range</p>	<p>The RTO combustion chamber temperature for normal operation is 1635⁰F. An excursion is defined as a temperature below 1605⁰F. An excursion will trigger an investigation to determine the reason for the occurrence, corrective actions, and a reporting/documentation requirement. When the RTO faults, the Cracker Line PLC program raises the cutting web to immediately stop sending cracker dough to the oven.</p> <p>The crackers already on the infeed belt and in the oven will continue to be processed until the oven is empty. This will require four (4) minutes to complete with the RTO in shutdown mode. Cracker production will be restarted immediately after the RTO is restarted and the minimum temperature is 1605⁰F.</p> <p>The excess VOC emissions during the excursion period will be recorded in the monthly VOC emissions worksheet using an uncontrolled emission factor in units of pounds of VOC per ton of leavened product as ethanol developed from the most recent compliance test results.</p>
<p>III. Performance Criteria</p>	<p>The sensors (thermocouple inputs) are in the RTO chamber and in the “A” and “B” ceramic-media beds as an integrated part of the oxidizer design. The sensors measure temperatures from 0⁰F to 2000⁰F. The standard tolerance is ± 4⁰F.</p>
<p>A. Data Representativeness</p>	
<p>B. Verification of Operational Status</p>	
<p>C. QA/QC Practices and Criteria</p>	
<p>D. Monitoring Frequency</p>	
<p>E. Data Collection Procedures</p>	<p>RTO chamber temperature is recorded continuously using a data acquisition and handling system (DAHS) and two (2) strip chart recorders will be available for use as backup recording devices. The temperature comes from an output of the distributed control system (DCS).</p>

	<p>If the DAHS and the backup systems are unavailable and leavened product is being produced in the oven, the Department must be notified within 24 hours and the RTO combustion chamber temperature will be manually recorded every thirty (30) minutes using the temperature display located at the oven exit operator control screen.</p>
<p>F. Reporting Units</p>	<p>Temperature – degrees Fahrenheit (°F)</p>

Pepperidge Farms, Inc. – Lakeland Facility

Emissions Unit 017

**Baking Line No. 6 (Bread Oven No. 2)
VOC Emissions Controlled By a Thermal Oxidizer**

Monitoring Approach

TABLE 2: MONITORING APPROACH

EMISSION UNIT 017 – REGENERATIVE THERMAL OXIDIZER (RTO)	
I. Indicator	<p>Regenerative Thermal Oxidizer (RTO) Chamber Temperature. The RTO is operated at no less than 1600⁰F as determined by the higher of the following temperature readings:</p> <ul style="list-style-type: none"> – Average of two (2) combustion chamber thermocouples – Media A Level 3 Thermocouple reading (One (1) Thermocouple- Highest in bed) – Media A Level 2 Thermocouple reading (One (1) Thermocouple) – Media A Level 1 Thermocouple reading (One (1) Thermocouple- Lowest in bed)) – Media B Level 3 Thermocouple reading(One (1) Thermocouple- Highest in bed) – Media B Level 2 Thermocouple reading(One (1) Thermocouple) – Media B Level 1 Thermocouple reading(One (1) Thermocouple- Lowest in bed) <p>The RTO records the higher of the above listed temperature readings.</p>
<p>Measurement Approach Analytical Devices</p>	<p>Thermocouple or other pressure/temperature measuring device as appropriate.</p>
<p>Monitoring Locations</p>	<p>Temperature at the RTO combustion chamber exit.</p>
II. Indicator Range	<p>The RTO combustion chamber temperature for normal operation is 1635⁰F. An excursion is defined as a temperature below 1605⁰F. An excursion will trigger an investigation to determine the reason for the occurrence, corrective actions, and a reporting/documentation requirement. If the temperature drops below 1605⁰F, the dough dividers will be shut down immediately. The dough already in the process system between the intermediate proofer and the oven will be processed and depanned using the standard automated procedures. This will require two (2) hours to complete with the RTO in shutdown mode. Bread production can be restarted immediately after the RTO is restarted and the minimum temperature is 1605⁰F.</p> <p>The excess VOC emissions during the excursion period will be recorded in the monthly VOC emissions worksheet using an uncontrolled emission factor in units of pounds of VOC per ton of</p>

	leavened product as ethanol developed from the most recent compliance test results.
III. Performance Criteria	The sensors (thermocouple inputs) are in the RTO chamber and in the “A” and “B” ceramic-media beds as an integrated part of the oxidizer design. The sensors measure temperatures from 0 ⁰ F to 2000 ⁰ F. The standard tolerance is ± 4 ⁰ F.
A. Data Representativeness	
B. Verification of Operational Status	Not Applicable
C. QA/QC Practices and Criteria	Calibrate, maintain and operate instrumentation in accordance with the manufacturer’s specifications. The thermocouples will be calibrated annually and upon replacement.
D. Monitoring Frequency	RTO combustion chamber temperature is measured and recorded continuously.
E. Data Collection Procedures	RTO chamber temperature is recorded continuously using a data acquisition and handling system (DAHS) and two (2) strip chart recorders will be available for use as backup recording devices. The temperature comes from an output of the distributed control system (DCS). If the DAHS and the backup systems are unavailable and leavened product is being produced in the oven, the Department must be notified within 24 hours and the RTO combustion chamber temperature will be manually recorded every thirty (30) minutes using the temperature display located at the oven exit operator control screen.
F. Reporting Units	Temperature – degrees Fahrenheit (⁰ F)

APPENDIX I

LIST OF INSIGNIFICANT EMISSIONS UNITS AND/OR ACTIVITIES

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

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

Brief Description of Emissions Units and/or Activities

Brief Description of Emissions Units and/or Activities

1. Central Vacuum Systems
2. Routine maintenance and repair activities, except painting
3. Painting
4. Degreasers
5. L1 and L2 Ovens (Non-yeast based product)
6. QC Laboratory
7. Emergency Generators (2)
8. Welding
9. Line 4 Oiler
10. Indoor Silos (11)
11. Bag Dump Stations (3)
12. Receiving Hoppers (5)
13. Hot Melt Systems (6)
14. 6.77 MMBTU/hour natural gas fired boilers (2) (exempt per Rule 62-210.300(3)(a), F.A.C., Categorical and Conditional Exemptions)
15. Ink Jet Printers (3)
16. 0.199 MMBtu/hour natural gas-fired Hot Water Heater

APPENDIX RR

FACILITY-WIDE REPORTING REQUIREMENTS

(Version Dated 1/10/2014)

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

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

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

RR2. Reports of Problems.

- a. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.
- b. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - (1) A description of and cause of noncompliance; and
 - (2) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- c. When requested by the Department, 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

APPENDIX RR

FACILITY-WIDE REPORTING REQUIREMENTS

(Version Dated 1/10/2014)

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

- d. "Immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays; and, for purposes of Rule 62-4.160(15) and 40 CFR 70.6(a)(3)(iii)(B), "promptly" or "prompt" shall have the same meaning as "immediately". [Rule 62-4.130, Rule 62-4.160(8), Rule 62-4.160(15), and Rule 62-213.440(1)(b), F.A.C.; 40 CFR 70.6(a)(3)(iii)(B)]

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

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

RR5. Annual Operating Report. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rules 62-210.370(2) & (3), 62-210.900 and 62-213.440(3)(a)2., F.A.C.]

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

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

APPENDIX RR

FACILITY-WIDE REPORTING REQUIREMENTS

(Version Dated 1/10/2014)

- c. A copy of the EAOR Title V Annual Emissions Fee Invoice generated by the electronic annual operating report (EAOR) application, must be submitted along with the annual emissions fee payment.
[Rules 62-210.370(3), 62-210.900 and 62-213.205, F.A.C.]

RR7. Annual Statement of Compliance.

- a. The permittee shall submit a Statement of Compliance with all terms and conditions of the permit that includes all the provisions of 40 CFR 70.6(c)(5)(iii), incorporated by reference at Rule 62-204.800, F.A.C., using DEP Form No. 62-213.900(7). Such statement shall be accompanied by a certification in accordance with Rule 62-213.420(4), F.A.C., for Title V requirements and with Rule 62-214.350, F.A.C., for Acid Rain requirements. Such statements shall be submitted (postmarked) to the Department and EPA:
- (1) Annually, within 60 days after the end of each calendar year during which the Title V permit was effective, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement; and
 - (2) Within 60 days after submittal of a written agreement for transfer of responsibility as required pursuant to 40 CFR 70.7(d)(1)(iv), adopted and incorporated by reference at Rule 62-204.800, F.A.C., or within 60 days after permanent shutdown of a facility permitted under Chapter 62-213, F.A.C.; provided that, in either such case, the reporting period shall be the portion of the calendar year the permit was effective up to the date of transfer of responsibility or permanent facility shutdown, as applicable.
- b. In lieu of individually identifying all applicable requirements and specifying times of compliance with, non-compliance with, and deviation from each, the responsible official may use DEP Form No. 62-213.900(7) as such statement of compliance so long as the responsible official identifies all reportable deviations from and all instances of non-compliance with any applicable requirements and includes all information required by the federal regulation relating to each reportable deviation and instance of non-compliance.
- c. The responsible official may treat compliance with all other applicable requirements as a surrogate for compliance with Rule 62-296.320(2), Objectionable Odor Prohibited.
[Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

RR8. Notification of Administrative Permit Corrections.

A facility owner shall notify the Department by letter of minor corrections to information contained in a permit. Such notifications shall include:

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

APPENDIX RR

FACILITY-WIDE REPORTING REQUIREMENTS

(Version Dated 1/10/2014)

- RR9. Notification of Startup.** The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.
- a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
 - b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.
- [Rule 62-210.300(5), F.A.C.]
- RR10. Report Submission.** The permittee shall submit all compliance related notifications and reports required of this permit to the Compliance Authority. {See front of permit for address and phone number.}
- RR11. EPA Report Submission.** Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to: Air, Pesticides & Toxics Management Division, United States Environmental Protection Agency, Region 4, Sam Nunn Atlanta Federal Center, 61 Forsyth Street SW, Atlanta, GA 30303-8960. Phone: 404/562-9077.
- RR12. Acid Rain Report Submission.** Acid Rain Program Information shall be submitted, as necessary, to: Department of Environmental Protection, 2600 Blair Stone Road, Mail Station #5510, Tallahassee, Florida 32399-2400. Phone: 850/488-6140. Fax: 850/922-6979.
- RR13. Report Certification.** All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C. [Rule 62-213.440(1)(b)3.c, F.A.C.]
- RR14. Certification by Responsible Official (RO).** In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]
- RR15. Confidential Information.** Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA. Any permittee may claim confidentiality of any data or other information by complying with this procedure. [Rules 62-213.420(2), and 62-213.440(1)(d)6., F.A.C.]
- RR16. Forms and Instructions.** The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The forms are listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resource Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, by contacting the appropriate permitting authority or by accessing the Department's web site at: <http://www.dep.state.fl.us/air/rules/forms.htm>.
- a. Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) (Effective 12/31/2013)
 - b. Statement of Compliance Form (Effective 06/02/2002).
 - c. Responsible Official Notification Form (Effective 06/02/2002).
- [Rule 62-213.900, F.A.C.: Forms (1), (7) and (8)]

APPENDIX TR
FACILITY-WIDE TESTING REQUIREMENTS
(Version Dated 9/12/2008)

Unless otherwise specified in the permit, the following testing requirements apply to each emissions unit for which testing is required. The terms “stack” and “duct” are used interchangeably in this appendix.

TR1. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

TR2. 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.]

TR3. Calculation of Emission Rate. For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

TR4. Applicable Test Procedures.

a. *Required Sampling Time.*

- (1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
- (2) **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 the Department to verify the day-to-day continuing compliance of a unit or activity with an

APPENDIX TR

FACILITY-WIDE TESTING REQUIREMENTS

(Version Dated 9/12/2008)

- applicable opacity standard shall be twelve minutes.
- b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. *Required Flow Rate Range.* For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
 - d. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

TABLE 297.310-1 CALIBRATION SCHEDULE			
ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass	5° F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5° F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/- 0.001" mean of at least three readings; Max. deviation between readings, 0.004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, when 5% change observed, annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

- e. *Allowed Modification to EPA Method 5.* When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

APPENDIX TR
FACILITY-WIDE TESTING REQUIREMENTS
(Version Dated 9/12/2008)

TR5. 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.]

TR6. Sampling Facilities. Permittees that are required to sample mass emissions from point sources shall install stack sampling ports and provide sampling facilities that meet the requirements of this condition. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must also comply with all applicable Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

- a. *Permanent Test Facilities.* The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.
- b. *Temporary Test Facilities.* The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.
- c. *Sampling Ports.*
 - (1) All sampling ports shall have a minimum inside diameter of 3 inches.
 - (2) The ports shall be capable of being sealed when not in use.
 - (3) The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
 - (4) For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
 - (5) On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.
- d. *Work Platforms.*
 - (1) Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
 - (2) On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
 - (3) On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees

APPENDIX TR

FACILITY-WIDE TESTING REQUIREMENTS

(Version Dated 9/12/2008)

- around the stack.
- (4) All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toe board, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.
- e. *Access to Work Platform.*
- (1) Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.
- (2) Walkways over free-fall areas shall be equipped with safety rails and toe boards.
- f. *Electrical Power.*
- (1) A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.
- (2) If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.
- g. *Sampling Equipment Support.*
- (1) A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.
- (a) The bracket shall be a standard 3 inch × 3 inch × one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.
- (b) A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.
- (c) The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.
- (2) A complete monorail or dual rail arrangement may be substituted for the eyebolt and bracket.
- (3) When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

TR7. 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.
- (2) For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
- (3) 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. Emissions units that are required to conduct

APPENDIX TR

FACILITY-WIDE TESTING REQUIREMENTS

(Version Dated 9/12/2008)

an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- (a) Did not operate; or
 - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.
- (4) During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
- (a) Visible emissions, if there is an applicable standard;
 - (b) Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - (c) Each NESHAP pollutant, if there is an applicable emission standard.
- (5) An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
- (6) For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup.
- (7) For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to paragraph 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup.
- (8) Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
- (9) The owner or operator shall notify the Department, 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.
- (10) An annual compliance test conducted for visible emissions shall not be required for units exempted from air permitting pursuant to subsection 62-210.300(3), F.A.C.; units determined to be insignificant pursuant to subparagraph 62-213.300(2)(a)1., A.C., or paragraph 62-213.430(6)(b), F.A.C.; or units permitted under the General Permit provisions in paragraph 62-210.300(4)(a) or Rule 62-213.300, F.A.C., unless the general permit specifically requires such testing.
- b. *Special Compliance Tests.* When the Department, 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 Department 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 the Department.
- c. *Waiver of Compliance Test Requirements.* If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a

APPENDIX TR
FACILITY-WIDE TESTING REQUIREMENTS
(Version Dated 9/12/2008)

bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of paragraph 62-297.310(7)(b), F.A.C., shall apply.

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

TR8. Test Reports.

- a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information.
 - (1) The type, location, and designation of the emissions unit tested.
 - (2) The facility at which the emissions unit is located.
 - (3) The owner or operator of the emissions unit.
 - (4) 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.
 - (5) 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.
 - (6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - (7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 - (8) The date, starting time and duration of each sampling run.
 - (9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 - (10) The number of points sampled and configuration and location of the sampling plane.
 - (11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 - (12) The type, manufacturer and configuration of the sampling equipment used.
 - (13) Data related to the required calibration of the test equipment.
 - (14) Data on the identification, processing and weights of all filters used.
 - (15) Data on the types and amounts of any chemical solutions used.
 - (16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 - (17) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 - (18) All measured and calculated data required to be determined by each applicable test procedure for each run.
 - (19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
 - (20) 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.
 - (21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who

APPENDIX TR

FACILITY-WIDE TESTING REQUIREMENTS

(Version Dated 9/12/2008)

conducts the test shall provide the certification with respect to the test procedures used. 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.]

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

Operation

- TV1. General Prohibition.** A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit. [Rule 62-4.030, Florida Administrative Code (F.A.C.)]
- TV2. Validity.** This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department. [Rule 62-4.160(2), F.A.C.]
- TV3. Proper Operation and Maintenance.** The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department 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 Department rules. [Rule 62-4.160(6), F.A.C.]
- TV4. Not Federally Enforceable. Health, Safety and Welfare.** To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. [Rule 62-4.050(3), F.A.C.]
- TV5. Continued Operation.** An applicant making timely and complete application for permit, or for permit renewal, shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, and in accordance with applicable requirements of the Acid Rain Program and applicable requirements of the CAIR Program, until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., F.A.C. [Rules 62-213.420(1)(b)2., F.A.C.]
- TV6. Changes Without Permit Revision.** Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation:
- a. Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;
 - b. A permitted source may implement operating changes, as defined in Rule 62-210.200, F.A.C., after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;
 - (1) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;
 - (2) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;
 - c. Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.
[Rule 62-213.410, F.A.C.]
- TV7. Circumvention.** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Compliance

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

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

- TV9.** Compliance with Federal, State and Local Rules. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of a facility or an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
- TV10.** Binding and enforceable. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions. [Rule 62-4.160(1), F.A.C.]
- TV11.** Timely information. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly. [Rule 62-4.160(15), F.A.C.]
- TV12.** Halting or reduction of source activity. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity. [Rule 62-213.440(1)(d)3., F.A.C.]
- TV13.** Final permit action. Any Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C. [Rule 62-213.440(1)(d)4., F.A.C.]
- TV14.** Sudden and unforeseeable events beyond the control of the source. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference. [Rule 62-213.440(1)(d)5., F.A.C.]
- TV15.** Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall, as of the effective date of the permit, be deemed compliance with any applicable requirements in effect, provided that the source included such applicable requirements in the permit application. Nothing in this condition or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program or the CAIR Program. [Rule 62-213.460, F.A.C.]
- TV16.** Compliance With Federal Rules. A facility or emissions unit subject to any standard or requirement of 40 CFR, Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. Nothing in this chapter shall relieve a facility or emissions unit from complying with such standard or requirement, provided, however, that where a facility or emissions unit is subject to a standard established in Rule 62-296, F.A.C., such standard shall also apply. [Rule 62-296.100(3), F.A.C.]

Permit Procedures

- TV17.** Permit Revision Procedures. The permittee shall revise its permit as required by Rules 62-213.400, 62-213.412, 62-213.420, 62-213.430 & 62-4.080, F.A.C.; and, in addition, the Department shall revise permits as provided in Rule 62-4.080, F.A.C. & 40 CFR 70.7(f).
- TV18.** Permit Renewal. The permittee shall renew its permit as required by Rules 62-4.090, 62.213.420(1) and 62-213.430(3), F.A.C. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

identified in Rules 62-210.900(1) [Application for Air Permit - Long Form], 62-213.420(3) [Required Information], 62-213.420(6) [CAIR Part Form], F.A.C. Unless a Title V source submits a timely and complete application for permit renewal in accordance with the requirements this rule, the existing permit shall expire and the source's right to operate shall terminate. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009. No Title V permit will be issued for a new term except through the renewal process. [Rules 62-213.420 & 62-213.430, F.A.C.]

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

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

TV21. Suspension and Revocation.

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

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

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

TV23. Emissions Unit Reclassification.

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

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

TV24. Transfer of Permits. Per Rule 62-4.160(11), F.A.C., this permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility. The permittee shall also comply with the

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

requirements of Rule 62-210.300(7), F.A.C., and use DEP Form No. 62-210.900(7). [Rules 62-4.160(11), 62-4.120, and 62-210.300(7), F.A.C.]

Rights, Title, Liability, and Agreements

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

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

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

TV28. Agreements.

- a. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (1) Have access to and copy any records that must be kept under conditions of the permit;
 - (2) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
 - (3) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
- b. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- c. The permittee agrees to comply with changes in Department 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 Department rules.

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

Recordkeeping and Emissions Computation

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

TV30. Recordkeeping.

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

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

- (1) The date, exact place, and time of sampling or measurements, and the operating conditions at the time of sampling or measurement;
- (2) The person responsible for performing the sampling or measurements;
- (3) The dates analyses were performed;
- (4) The person and company that performed the analyses;
- (5) The analytical techniques or methods used;
- (6) The results of such analyses.

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

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

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

- a. *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (1) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (2) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (3) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- b. *Continuous Emissions Monitoring System (CEMS).*
 - (1) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or,
 - (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (2) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - (a) A calibrated flowmeter that records data on a continuous basis, if available; or

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

- (b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (3) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- c. *Mass Balance Calculations.*
 - (1) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - (a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and,
 - (b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (2) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (3) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- d. *Emission Factors.*
 - (1) An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - (a) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - (b) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - (c) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
 - (2) If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- e. *Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

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

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

Responsible Official

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

Prohibitions and Restrictions

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

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

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

STATEMENT OF BASIS

Title V Air Operation Permit Revision & Renewal Permit No. 1050174-012-AV

APPLICANT

The applicant for this project is Pepperidge Farm, Inc. The applicant's responsible official and mailing address are: Sam Morrone, Plant Manager, Pepperidge Farm, Inc., Lakeland Facility, 2222 Interstate Drive, Lakeland, FL 33805.

FACILITY DESCRIPTION

The applicant operates the Lakeland Facility, which is located at 2222 Interstate Drive, Lakeland.

The existing facility consists of seven flour silos, one biscuit sugar silo and five baking lines (including five natural gas-fired ovens and two regenerative thermal oxidizers (RTO)). Particulate emissions from silo loading operations are each controlled by identical Reimelt Jet Filter Model JF 1268-52 baghouse dust collectors mounted on the top of each silo. Volatile Organic Compound (VOC) emissions from baking line No. 1 – 3, boilers, process heaters and dryers are uncontrolled. VOC emissions from the baking line Nos. 5 and 6 are routed through two separate RTOs, which are also fired with natural gas. A new microwave heating unit has been added to Baking Line No. 5 product line downstream of its RTO. Baking Line No. 4 has been permanently removed from the facility.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to revise & renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit No. 1050174-009-AV issued 12/19/2009
Application for a Title V Air Operation Permit Revision and Renewal received 5/9/2014
Additional Information Request dated 5/28/2014
Additional Information Response received 7/10/2014
Notice of Intent to Issue Air Permit issued 7/22/2014
Public Notice Published 8/9/2014

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

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

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

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

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

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

STATEMENT OF BASIS

Siting: The facility is not subject to the power plant siting provisions of Chapter 62-17, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Emissions Unit Nos. 016 & 017. Emissions Unit Nos. 016 & 017 are subject to CAM for the regulated pollutant volatile organic compounds (VOC), which are controlled by regenerative thermal oxidizers (RTOs).

PROJECT REVIEW

The Title V permit revision & renewal is done in the current template format, replaced TV-6 with the new appendices TV, TR and RR, streamlined all EU sections by moving common conditions to new appendices.

A new microwave heating unit has been added to Baking Line No. 5 product line downstream of its RTO by an air construction permit 1050174-010-AC.

Revisions to the permit 1050174-009-AV are listed as below:

1. Add a new microwave heating unit to the existing Baking Line No. 5, Cracker Oven No. 2, EU No. 016.
2. Add a new chiller for the new microwave heating unit in EU No. 016.
3. Add a new product conveyor to EU No. 016.
4. Add a new seasoning system to EU No. 016

CONCLUSION

This project revises & renews Title V Air Operation Permit No. 1050174-009-AV, which was issued on 12/19/2009. This Title V air operation permit revision & renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.

TABLE H
PERMIT HISTORY

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type
All	Facility	1050174-001-AV	09/08/1999	09/08/2004	Initial Title V
-016	Baking Line No. 5	1050174-002-AC	02/09/2004	12/31/2005	Construction (new.)
-016	Baking Line No. 5	1050174-005-AC	06/30/2005	12/31/2005	Construction (mod.)
All	Facility	1050174-003-AV	09/09/2005	09/09/2010	Renewal
-016	Baking Line No. 5	1050174-006-AC	07/18/2007	12/31/2007	Construction (mod.)
All	Facility	1050174-007-AV	10/07/2007	09/09/2010	Revision
017	Baking Line No. 6	1050174-008-AC	09/26/2007	10/31/2009	Construction (new.)
All	Facility	1050174-009-AV	12/19/2009	12/19/2014	Renewal
016	Baking Line No. 5	1050174-010-AC*	06/28/2013	12/31/2015	Construction (mod.)
018	Flour Silo S-55	1050174-011-AC**	04/21/2014	12/31/2015	Construction (mod.)
All	Facility	1050174-012-AV	09/24/2014	09/24/2019	Renewal

* Construction permit has been incorporated into this Title V permit.

** Construction permit has not been incorporated into this Title V permit.

TABLE 1
SUMMARY OF AIR POLLUTANT STANDARDS AND TERMS

E.U. ID No.	Brief Description	Fuel(s)	Hrs/Yr	Pollutant Name	Standard Allowable Emissions	Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
						lbs/hr Per unit	TPY		
001 - 007	Flour Silos		416	PM	0.63 lb/hr, 0.13 tpy per silo	0.63	0.13	62-296.700(a), & (c), F.A.C.	III.A.2. &.4
				VE	5% opacity	N/A	N/A	62-297.620(4), F.A.C.	III.A.5
008	Biscuit Sugar Silo		260	PM	0.62 lb/hr, 0.08 tpy	0.62	0.08	62-296.700(a), & (c), F.A.C.	III.B.2 &.4
				VE	5% opacity	N/A	N/A	62-297.620(4), F.A.C.	III.B.5
009-011	Baking Lines 1 - 3	natural gas	8760	VOC	N/A		N/A		
016	Baking Line No. 5	natural gas	8760	VOC	12.9 tpy		12.9	62-296.320(1), F.A.C.	III.D.7
017	Baking Line No. 6	natural gas	8760	VOC	5.82 tpy		5.82	62-296.320(1), F.A.C.	III.E.6

* The "Equivalent Emissions" listed are for informational purposes only.

TABLE 2
COMPLIANCE REQUIREMENTS

E.U. ID No.	Brief Description	Fuel(s)	Pollutant Name	Emission Monitoring¹	Emission Control	Compliance Method EPA Method	Testing Time Frequency	Frequency Base Date²	Min. Compliance Test Duration	See Permit Condition(s)
001 - 007	Flour Silos		VE			Method 9	Prior to renewal		30 minutes	III.A.5 & 6
001 - 007	Flour Silos		PM							Waived per III.A. 5
008	Biscuit Sugar Silo		VE			Method 9	Prior to renewal		30 minutes	III.B.5 & 6
008	Biscuit Sugar Silo		PM							Waived per III.B. 5
009-011	Baking Lines 1 - 3		VOC/HAP			Recordkeeping	Monthly			III.C.4
016	Baking Line No. 5		VOC/HAP			Recordkeeping	Monthly	N/A	N/A	III.D. 15
016	Baking Line No. 5		VOC/HAP		RTO	Method 25A for VOC destruction η	Prior to renewal			III.D. 9
016	Baking Line No. 5		VOC/HAP		RTO	Methods 1 & 2 for residence time	Prior to renewal			III.D. 9
016	Baking Line No. 5		VE			Method 9	Prior to renewal		30 minutes	III.D. 9
017	Baking Line No. 5		VOC/HAP			Recordkeeping	Monthly	N/A	N/A	III.E. 14
017	Baking Line No. 5		VOC/HAP		RTO	Method 25A for VOC destruction η	Prior to renewal			III.E. 8
017	Baking Line No. 5		VOC/HAP		RTO	Methods 1 & 2 for residence time	Prior to renewal			III.E. 8
017	Baking Line No. 5		VE			Method 9	Prior to renewal		60 minutes	III.E. 8