FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

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SECRETARY

DRAFT PERMIT

PERMITTEE

Publix Super Markets, Inc.
3300 Publix Corporate Parkway
Lakeland, Florida 33811

Authorized Representative:
Mr. Jeff Stephens, Vice President, Manufacturing

Air Permit No. 1050177-007-AC
Permit Expires: 11/30/2014
Publix Lakeland Danish Bakery
Minor Air Construction Permit
Add New Sugar Silo (EU No. 010)

This is the final air construction permit to add a new sugar silo (EU ID No. 010) which will be used to feed a new sugar grinding process. The proposed work will be conducted at the Publix Lakeland Danish Bakery (Standard Industrial Classification No. 2051). The facility is located in Polk County at 3620 New Tampa Highway in Lakeland, Florida. The UTM coordinates are Zone 17, 400.8 km East, and 3101.5 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

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

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

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

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

Mr. Jeff Stephens, Publix Super Markets, Inc. (jeff.stephens@publix.com)

Ms. Brenda Williams, Publix Super Markets, Inc. (brenda.williams@publix.com)

Mr. Michael W. Hewitt, P.E., Publix Super Markets, Inc. (michael.hewett@publix.com)

Ms. Susan Pelz, SWD Compliance Assurance Program Team Leader Manager (susan.pelz@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.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility includes six permitted raw material storage silos (Silo Nos. 1, 2, 3, 4, 5 and 6) used to store Rye, Winona, Cake, Pastry and other types of flours and granulated sugar. The silos are loaded pneumatically from trucks and monitored during loading by a computer based recording system that captures system loading pressures and material loading time. Each silo is equipped with an independent baghouse to control particulate matter emissions.

This facility also includes two large natural gas fired pastry ovens (Winkler-Chubco (W-B) Oven No. 3 and Food Handling Systems (FHS) Oven No. 6.) each with a design heat input rate of 2.5 MMBtu/hour.

Facility ID No. 1050177

EU ID No.	Emissions Unit Description
001	Flour Silo No. 1 (Winona)
002	Flour Silo No. 2 (Rye)
003	Flour Silo No. 3 (Winona)
004	Sugar Silo No. 4 (Granulated Sugar)
005	Flour Silo No. 5 (Cake)
006	Flour Silo No. 6 (Pastry)
008	Winkler-Chubco (W-B) Oven No. 3
009	Food Handling Systems (FHS) Oven No. 6

NOTE: *The facility previously included EU ID No. 007 (Flour Silo No. 7) which was permanently shutdown in 2010.*

Project Description and Proposed Emission Units

This project will add a new sugar silo which will be used to feed an indoor sugar grinding process. The new silo will be equipped with a dust collector to control particulate matter emissions during the loading of granular sugar. This project will also make the following changes to existing emissions units:

- The 2,500 hours per year loading restrictions on Silo No. 6 (EU No. 006) will be removed.
- The loading restriction that limit the facility to load a maximum of three (3) silos at any one time and only one of Silo Nos. 1 through 5 at any one time will be removed.
- The silo loading procedures associated with the computer based pressure recording system will be removed.
- The visible emissions limits and testing requirements for EU Nos. 001 through 006 will be removed.
- Annual silo loading limits and monthly recordkeeping requirements for Silo Nos. 1 through 5 (EU ID Nos. 001 through 005) will be added.

This project will create and modify the following emissions units (EUs).

EU ID No.	Emissions Unit Description
001	Flour Silo No. 1 (Winona)
002	Flour Silo No. 2 (Rye)
003	Flour Silo No. 3 (Winona)
004	Sugar Silo No. 4 (Granulated Sugar)
005	Flour Silo No. 5 (Cake)
006	Flour Silo No. 6 (Pastry)
010	Sugar Silo No. 10 (Granulated Sugar) (New)

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

Exempt Emission Sources/Activities

- two natural gas fired Cleaver-Brooks 4.2 MMBtu/hour boilers [Rule 210.300(3)(a)34., F.A.C.];
- one natural gas fired Cleaver-Brooks 8.4 MMBtu/hour boiler [Rule 210.300(3)(a)34., F.A.C.];
- six small natural gas fired bakery ovens (i.e., Oven Nos. 1 - 6) used to bake non-yeast containing products [Rule 210.300(3)(b)1., F.A.C.];
- one natural gas fired Food Lab Oven, and two rack/pan washers [Rule 210.300(3)(b)1., F.A.C.].

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants particulate matter less than 10 microns (PM_{10}) and volatile organic compounds (VOC). The emission limitations and restriction on the type or amount of material processed in this permit will ensure that the facility's PM_{10} and VOC emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit Nos. AC53-235043 and 1050177-003-AC, and modifies Operation Permit No. 1050177-006-AF.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

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

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

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

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

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical

change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

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

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

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

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition Nos. A.6. and B.5.

The application shall be submitted to the Permitting Authority.

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

A. EU Nos. 001, 002, 003, 004, 005, 006 and 010 – Raw Material Storage Silos

This section of the permit addresses the following emissions units (EUs).

EU ID No.	Emissions Unit Description
001	Flour Silo No. 1 (Winona) - This silo is used to store winona flour and has a maximum annual loading rate of approximately 123,400 tons per year. It is equipped with a Reinmelt Corporation Model BF-600-1800-2 baghouse which is rated at 525 ACFM. The baghouse vents inside an enclosure on top of the silo (separate enclosure for each baghouse) and then from the enclosure, exhausts through two vents shared by silos 1 through 5. This silo is an older silo and is subject to the PM RACT rule (Rule 62-296.700, F.A.C.)
002	Flour Silo No. 2 (Rye) - This silo is used to store rye flour and has a maximum annual loading rate of approximately 131,000 tons per year. It is equipped with a Reinmelt Corporation Model BF-600-1800-2 baghouse which is rated at 525 ACFM. The baghouse vents inside an enclosure on top of the silo (separate enclosure for each baghouse) and then from the enclosure, exhausts through two vents shared by silos 1 through 5. This silo is subject to the PM RACT rule (Rule 62-296.700, F.A.C.)
003	Flour Silo No. 3 (Winona) - This silo is used to store winona flour and has a maximum annual loading rate of approximately 127,100 tons per year. It is equipped with a Reinmelt Corporation Model BF-600-1800-2 baghouse which is rated at 525 ACFM. The baghouse vents inside an enclosure on top of the silo (separate enclosure for each baghouse) and then from the enclosure, exhausts through two vents shared by silos 1 through 5. This silo subject to the PM RACT rule (Rule 62-296.700, F.A.C.)
004	Sugar Silo No. 4 (Granulated Sugar) -This silo is used to store granulated sugar and has a maximum annual loading rate of approximately 101,800 tons per year. It is equipped with a Reinmelt Corporation Model BF-600-1800-2 baghouse which is rated at 525 ACFM. The baghouse vents inside an enclosure on top of the silo (separate enclosure for each baghouse) and then from the enclosure, exhausts through two vents shared by silos 1 through 5. This silo is subject to the PM RACT rule (Rule 62-296.700, F.A.C.)
005	Flour Silo No. 5 (Cake) -This silo is used to store cake flour and has a maximum annual loading rate of approximately 104,700 tons per year. It is equipped with a Reinmelt Corporation Model BF-600-1800-2 baghouse which is rated at 525 ACFM. The baghouse vents inside an enclosure on top of the silo (separate enclosure for each baghouse) and then from the enclosure, exhausts through two vents shared by silos 1 through 5. This silo is subject to the PM RACT rule (Rule 62-296.700, F.A.C.)
006	Flour Silo No. 6 (Pastry) - This silo is used to store pastry flour and has a maximum annual loading rate of approximately 92,200 tons per year. It is equipped with a Pfenning Company Model No. A20063 baghouse. This silo is not subject to the PM RACT rule.
010	Flour Silo No. 10 (Granulated Sugar) - This silo is used to store granulated sugar and has a maximum annual loading rate of approximately 30,660 tons per year. It is equipped with a MAC Process Model 55AVRC80 Style III baghouse. This silo is not subject to the PM RACT rule.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity for EU Nos. 001 through 005 - The following silos are limited to the maximum throughput limits specified in the table below:

EU ID No.	**Maximum Silo Throughput** (Tons per any consecutive 12 month period)
001	123,400
002	131,000
003	127,100
004	101,800
005	104,700

{Permitting Note: Compliance with the silo throughput limits listed in the table above also demonstrates compliance with the particulate matter standard listed in Specific Condition No A.3. This is based on the fact that each silo has dust factor of 0.01 (i.e., 1% emissions, uncontrolled) and a dust collector PM control efficiency of 99.985%.}

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

A.2. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

EMISSIONS STANDARDS

A.3. Particulate Matter Emissions Standard for EU Nos. 001 through 005 - The following silos are limited to the maximum particulate matter emissions standards specified in the table below:

EU ID No.	**Maximum Particulate Matter Emissions** (Tons per any consecutive 12 month period)
001	0.99
002	0.99
003	0.99
004	0.99
005	0.99

{Permitting Note: Each silo listed in the table above is subject to Rule 62-296.700, F.A.C. (PM RACT). To qualify for the exemption from the requirements of PM RACT, the PM allowable has been limited below 1 ton per year. Compliance with the silo throughput limits of Specific Condition No. A.1. will be considered a demonstration of compliance with the particulate matter emissions standard of this condition.}

[Rules 62-4.070(3) and 62-296.700(2)(c), F.A.C.]

EMISSIONS AND CONTROLS

A.4. Circumvention - The permittee shall not circumvent the air pollution control equipment (i.e. the baghouse control devices used on EU ID Nos. 001, 002, 003, 004, 005, 006 & 010) or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, F.A.C.]

NOTIFICATION REQUIREMENTS

A.5. Notification of Operation Commencement for EU ID No. 010 - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 010 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose. [Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.6. Silo Loading for EU ID Nos. 001 through 005 – To document compliance with the silo throughput limits of Specific Condition No. A.1., the permittee shall maintain the following daily and monthly records.

a. Daily Records – Daily records shall show each time a silo is loaded and shall include at a minimum the following:
   (1) facility name, facility number (1050177), and the date,
   (2) the type material being loaded into the silo (i.e., type of flour, or sugar), and
   (3) the quantity of material loaded, in tons.

b. Monthly Records – Monthly records shall include the following:
   (1) facility name, facility number (1050177), month, year;.
   (2) the total quantity of material loaded (in tons) for the month.
   (3) the total quantity of material loaded (in tons) for the most recent consecutive 12-month period.

Daily records shall be completed within three (3) business days. Monthly records shall be completed no later than three (3) weeks after the end of each month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.

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

B. EU Nos. 008 and 009 – Bakery Ovens

This section of the permit addresses the following emissions units (EUs).

EU ID No.	Emissions Unit Description
008	Winkler-Chubco (W-B) Oven No. 3 - This emissions unit consists of a natural gas fired pastry oven which has a maximum design heat input rate of 2.5 MMBtu/hour. This oven is a source of VOC emissions.
009	Food Handling Systems (FHS) Oven No. 6 - This emissions unit consists of a natural gas fired pastry oven which has a maximum design heat input rate of 2.5 MMBtu/hour. This oven is a source of VOC emissions.

PERFORMANCE RESTRICTIONS

B.1. Authorized Fuel - The bakery ovens shall be fired with natural gas or propane only
[Permit No. 1050177-006-AF and Rule 62-210.200(definition of Potential to Emit), F.A.C.]

B.2. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

EMISSIONS STANDARDS

B.3. VOC Emissions Standard – VOC emissions from the bakery ovens shall be limited as follows:

a. E.U. ID No. 008 - VOC emissions from Winkler-Chubco Oven No. 3 shall not exceed 25 tons per any 12 consecutive month period;

b. E.U. ID No. 009 - VOC emissions from the Food Handling System Oven No. 6 shall not exceed 74 tons per any 12 consecutive month period;

c. The two permitted ovens (E.U. ID No. 008 and 009) shall be the primary ovens used to process yeast containing (i.e. VOC producing) products. Minor amounts of yeast containing products may be baked in other ovens with the limitation that total VOC emissions from all ovens shall not exceed 99 tons per any 12 consecutive month period.

[Rule 62-4.070(3), F.A.C.; Operation Permit No. 1050177-006-AF]

{Title V Applicability Note: The VOC potential to emit from natural gas combustion at this facility (including exempt emission sources and assuming 8,760 hours/year operation) is 0.60 TPY. The VOC potential to emit at the facility (including the permitted bakery oven limit and exempt emissions sources) is 99.6 TPY. This is less than the Title V major source level of 100 TPY, and therefore this facility considered a synthetic Non-Title V source for the pollutant VOC.}

RECORDKEEPING AND REPORTING REQUIREMENTS

B.4. VOC Emission Calculations - Compliance with the VOC limitations of Specific Condition No. B.3. shall be based upon calculation of VOC emission rates from actual product line production rate and the VOC emission factors for each product line based on the equation contained in Section 9.9.6-1 of U.S. EPA AP-42 -Compilation of Air Pollutant Emission Factors as follows:

VOC Ef = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90

where:

VOC Ef	= pounds VOC/ton of baked product
Yi	= initial baker's percent of yeast
Ti	= total yeast action time in hours
S	= final (spike) baker's percent of yeast *
Ts	= spiking time in hours *

(* Note: Spiking is not currently a part of the baking process at this facility.)

[Rule 62-4.070(3), F.A.C.; Operation Permit No. 1050177-006-AF]

B.5. Monthly Oven Production and VOC Records - To document compliance with VOC emission limitations of Specific Condition No. B.3., the permittee shall maintain monthly product line records for each of the two main baking ovens (i.e., W-C Oven No. 3 and FHS No. 6), and for all yeast containing products baked in any other ovens at this facility (excluding the laboratory ovens used for product testing only.) These records shall include at a minimum the following:

a. facility name, facility number (1050177), month, year;

b. pounds of product produced by product line designation (i.e., by bread type) by that oven;

c. initial yeast content, total yeast action time, final (spike) % of yeast (if any), and spiking time (if any) for each product line;

d. calculated VOC emission factor for each product line based upon Specific Condition No. B.4. above;

e. calculated VOC emissions for that oven for each product line based upon b. and d. above for the month (pounds or tons VOC per month);

f. total VOC emissions for that oven for the month, and for the most recent 12 consecutive month period (tons VOC per 12 consecutive month period);

g. total facility VOC emissions for all ovens combined for the most recent 12 consecutive month period (facility total tons VOC per 12 consecutive month period).

Monthly records shall be completed no later than three (3) weeks after the end of each month. Supporting documentation which includes sufficient information to verify the data above (i.e., basis for yeast content, yeast action time, spike information (if any)) shall also be kept. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Operation Permit No. 1050177-006-AF]