FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

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

Authorized Representative:
Mr. Sam Morrone, Plant Manager

Air Permit No. 1050174-011-AC
Permit Expires: 12/31/2015
Pepperidge Farm Lakeland Facility
Minor Air Construction/Operation Permit
Construct a new silo and reactivate an existing silo

This is the final air construction permit to construct a new flour silo, reactivate an existing silo and eliminate operation time limits and associated recordkeeping requirements on each silo. The proposed work will be conducted at the Pepperidge Farm, Inc., Lakeland Facility (Standard Classification Nos. 2051 & 2052). The facility is located in Polk County at 2222 Interstate Drive, Lakeland, Florida. The UTM coordinates are Zone 17, 403.64.67 km East, and 3105.80 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

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

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

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

Executed in Hillsborough County, Florida

Kelley M. Boatwright — 04/21/2014

Kelley M. Boatwright — Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

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

Sam Morrone, Pepperidge Farm, Inc. (sam_morrone@pepperidgefarm.com)
Iman Jones, Pepperidge Farm, Inc. (iman_jones@pepperidgefarm.com)
William Straub, P.E., all4inc.com (wstraub@all4inc.com)
Erin DiBacco FDEP Southwest District (erin.dibacco@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.

Alexa Brantley — 04/21/2014
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

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

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

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

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

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

The existing facility consists of the following emissions units (EUs).

Facility ID No. 1050174

EU ID No.	Emissions Unit 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
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

Project Description and Affected/Proposed Emission Units

This project will add a new flour silo which will be used to feed the baking lines to produce bread and cracker products. The new silo will be equipped with a baghouse collector mounted on the top of the silo to control particulate matter emissions during the loading of the flour pneumatically from the delivery trucks. The project will also make the following changes to the existing emissions units:

- The 416 hours per year loading restrictions on Silo Nos. S-2, S-3, S-4, S-5, S-51, S-52 and S-53 (EU Nos. 001 - 007) will be removed.
- The Sugar Silo No. S-54 (EU No. 008) will be reactivated, re-named as Flour Silo No. S-54 (EU No. 008) and will be refitted with a new fabric filter bin vent.
- The new Flour Silo No. S-55 (EU No. 018) will be constructed and operated along with all the other flour silos.
- New emissions factors based on the silo air displacement rate and the bin vent manufacturer maximum grain loading guarantee for each silo with a 50% safety factor will be used to calculate particulate matter (PM) emissions from each silo.

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

EU ID No.	Emissions Unit 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
008	Flour Silo S-54 (Modified)
018	Flour Silo S-55 (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 8.77 MMBtu/hour boilers [Rule 210.300(3)(a)34., F.A.C.];
- one natural gas fired 0.199 MMBtu/hour hot water heater [Rule 210.300(3)(a)34., F.A.C.];
- one small natural gas fired industrial clothes dryer [Rule 210.300(3)(b)1., F.A.C.].

FACILITY REGULATORY CLASSIFICATION

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

PERMIT HISTORY/AFFECTED PERMITS

References current Title V Air Operation Permit 1050174-009-AV. Replaces construction permit AC53-243938.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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

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

b. a copy of the initial compliance test report(s) required by Specific Condition No. A.12, if not previously submitted.

The application shall be submitted to the Permitting Authority.
[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

A. EU Nos. 001–008 and 018

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

EU ID No.	Emissions Unit Description
001 - 007	Flour Silos S-2, S-3, S-4, S-5, S-51, S-52 and S-53 – Each of these silos is used to store any of the following types of flour: short patent flour, high gluten flour, whole-wheat flour, all-purpose flour, and cracker flour. Each of these silos is loaded pneumatically from delivery trucks at a maximum loading rate of 60, 000 pounds per hour. Particulate matter emissions from the silo loading operation are controlled by a Reimelt Jet Filter Model JF 1268-52 baghouse which is rated at 682 acfm. The baghouse vents within a secondary structure that encloses the silo which then exhausts to the atmosphere through twe (2) vents in the side-wall of the secondary structure. This is an older silo and is subject to PM RACT rule (Rule 62-296.700, F.A.C.).
008	Flour Silo S-54 – This silo is used to store any of the following types of flour: short patent flour, high gluten flour, whole wheat flour, all-purpose flour, and cracker flour. This silo is loaded pneumatically from delivery trucks at a maximum loading rate of 60, 000 pounds per hour. Particulate matter emissions from the silo loading operation are controlled by a Jet Filter Model 1273-40P-21.4-5 baghouse collector mounted on the top of the silo and which is rated at 682 acfm. The baghouse collector is vented to an enclosure on top of the silo which then exhausts to the atmosphere through 2 (two) vents in the side-wall of the secondary structure. This is an older silo, used to be a sugar silo and was inactive for a long time. It is refitted with a new fabric filter vent and reactivated as a flour silo. It is considered to be a new silo based on its new control device and is not subject to PM RACT rule (Rule 62-296.700, F.A.C.).
018	Flour Silo S-55 - This silo is used to store any of the following types of flour: short patent flour, high gluten flour, whole wheat flour, all-purpose flour, rye flour and cracker flour. This silo is loaded pneumatically from delivery trucks at a maximum loading rate of 60, 000 pounds per hour. Particulate matter emissions from the silo loading operation are controlled by a WAMAIR Model No. FPXITM22V baghouse collector mounted on the top of the silo. The baghouse is rated at 1,243 acfm which exhausts to the atmosphere. This is a new silo and is not subject to PM RACT rule (Rule 62-296.700, F.A.C.).

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity – The maximum silo loading rate for each silo shall not exceed 60,000 pounds per hour of flour.

(Permitting Note - See Appendix D, Condition 1, for operation rate during testing requirements.)

[Rule 62-210.200 (definition of Potential to Emit), F.A.C. and Construction Permit Application dated 02/17/2014]

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.; Construction Permit Application dated 02/17/2014]

EMISSIONS STANDARDS

A.3. Particulate Matter (PM) Emissions Limit – The following silos are limited to the maximum particulate matter emissions standards specified in the table below:

EU ID No.	Maximum Particulate Matter Emissions (lb/hr)	Maximum Particulate Matter Emissions (Tons per any consecutive 12 month period)
001	0.22	0.99
002	0.22	0.99
003	0.22	0.99
004	0.22	0.99
005	0.22	0.99
006	0.22	0.99
007	0.22	0.99

{Permitting Note: Each silo (EU 001-007) 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 for each emissions unit. Silo (EU 008) is considered a new one due to refitting with a new fabric filter vent. Silo (EU 018) is a brand new silo. So, the EU Nos. 008 & 018 are not subject to PM RACT}
[Construction Permit Application dated 02/17/2014; Rule 62-296.700(2)(c), F.A.C.]

A.4. Visible Emissions (VE) Limit – The silos 008 and 018 visible emissions (VE) are limited to 5% opacity.
[Construction Permit Application dated 02/17/2014]

COMPLIANCE TESTING REQUIREMENTS

A.5. Initial Compliance Tests - The emissions unit Nos. 008 and 018 baghouse exhaust shall be tested to demonstrate initial compliance with the emissions standards for VE. The initial tests shall be conducted no later than 90 days after initial operation of the units.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

A.6. Compliance Tests After Initial Testing – At least 270 days prior to and no more than 365 days prior to the expiration date of the Title V permit, each of the emissions units (E.U. Nos. 001-007) shall be tested to demonstrate compliance with the emissions standards for PM and the emissions units (E.U. Nos. 008 & 018) for VE. The permittee shall visually inspect each baghouse collector on a quarterly basis to ensure that the collectors are in proper working condition.
[Rule 62-297.310, F.A.C.]

A.7. Alternative Testing for E.U. Nos 001 - 007 - 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 matter stack.
[Rule 62-297.620(4), F.A.C.]

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

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

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

The above method is described in Appendix A of 40 CFR 60 and is 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 62-204.800, F.A.C.; Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.10. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.11. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU Nos. 008 and 018 after completing the construction/modification 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.12. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.13. 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 period 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.]

A.14. Silo Recordkeeping - In order to document compliance with the silo filling rate of Condition No. A.1, the permittee shall maintain a record of the silo filling operations. The records of silo filling shall be maintained for the period of compliance testing only and shall show the following:

a. the date;
b. the silo being filled (silo ID number);
c. start and end time of silo filling operation, and resulting silo filling (operating) time (hours);
d. quantity of material loaded (pounds);
e. material loading rate (pounds per hour).

{Permitting note: Silo recordkeeping is required for compliance testing only.}

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

A.15. Maintenance of Records - The permittee shall maintain a record of the date of inspection (ref. condition A.6), signature of the person performing the inspection, and any corrective action taken. The record shall include a list of spare parts available on site.
[Rule 62-4.070(3), F.A.C.]