Title V Air Operation Permit Renewal
Permit No. 0250664-009-AV

APPLICANT

The applicant for this project is Flowers Baking Company of Miami, LLC. The applicant's responsible official and mailing address are: John Deleu, Plant President, Flowers Baking Company of Miami, LLC. facility, 17800 NW Miami Court, Miami, FL 33169.

FACILITY DESCRIPTION

The applicant operates the Flowers Baking Company of Miami, LLC facility, which is located at 17800 NW Miami Court, Miami, FL 33169.

This facility consists of the following emissions units:

EU No.	Brief Description
003	**One (1) Stewart Systems, Inc., Model Type Conveyorized Bun Oven (Bun Oven No. 2)** **Bun Oven installed 11/1996 and utilizes liquid brew formulas** ▪ Max Heat Input: 5.75MMBtu/hr ▪ Max Process Rate: 9,157 lb/hr ▪ Max Baked Bun Production Rate: 8,241 lb/hr (36,097 tons per year) Direct fired, natural gas 48 MMcf/yr, two exhaust stacks 32' high 1.1' diameter
004	**Two (2) Boilers, natural gas fired (installed 1/1/1980)** **Cleaver Brooks Model No. CB200-150, each with the following specifications**: ▪ Max Heat Input Rating: 6.27 MMBtu/hr ▪ Max Process Rate: 6,270 scf gas/hr ▪ Max Gas Usage 54.93 MMcf per year Exhaust stack, 35' high, 1.3'diameter
007	**One (1) Baker Perkins, Model No. 970 Replacement Bread Oven** **Replacement Bread Oven installed 3/98 utilizes straight and sponge dough formulas** ▪ Max Heat Input Rating: 4.98 MMBtu/hr ▪ Max Input Capacity: 11,460 lb/hr ▪ Max Baked Bread Production Rate: 10,314 lb/hr Direct fired, natural gas 43.8 MMcuft/yr, two exhaust stacks 37' high 1.3' diameter

Flowers Baking Company of Miami, LLC. is a commercial bakery. The facility produces bread and bread-type bun products for human consumption utilizing three high speed production lines. Bread production at the facility consists of mixing ingredients such as flour, water, sugar and yeast in a dough mixing process, followed by fermentation, baking, and packaging of the bread products.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V Air Operation Permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received July 11, 2013.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not 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 not a source of air pollution for Prevention of Significant Deterioration (PSD) in accordance with Rule 62-212.400, F.A.C.

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

NESHAP: The facility does not operate 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.

CAM: Compliance Assurance Monitoring (CAM) does not apply.

PROJECT REVIEW

Specific changes were made to the previous Title V Air Operation Permit No. 0250664-008-AV, and are in this DRAFT Title V Air Operation Permit Renewal. Such changes include applying FDEP reformatting of the entire permit document, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc. For example, some of the recordkeeping, and testing requirements that were previously listed under TV-6, (i.e. administrative permit corrections, deviation reports, etc.) and the Facility-Wide Conditions, and Specific Conditions under the previous Title V permit (i.e. certification by responsible official, testing, submittal of monitoring reports, statement of compliance, etc.) are now listed under the new Appendix RR – Facility-Wide Reporting Requirements, and Appendix TR – Facility-Wide Testing Requirements.

Additionally, recent organizational changes have occurred within the Miami-Dade County Government and the Department of Environmental Resources Management (DERM) was merged with other departments. The new name is now the Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. As a result, some references to DERM in the permit have been changed to RER.

Items numbered 1 – 6 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions. ~~Strikethrough indicates text removed~~.

1. Changes in Section I – Subsection B, Summary of Emissions Units. Emissions Unit 002 – Bun Oven No. 1 ceased operation in October, 2008, and at the applicant's request has been removed from the permit. The other emissions units description have been modified to keep consistency with permit description format as follows:

E.U. ID No.	Brief Description
003	One (1) Stewart Systems, Inc. Model Type Conveyorized Bun Oven (Bun Oven No. 2)
004	Two (2) Cleaver Brooks, Model No. CB200-150 Natural Gas Boilers One (1) Baker Perkins, Model No. 970 Replacement Bread Oven

007	

2. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Units 002, 003 & 007. Emissions Unit No. 2 has been removed from the permit. The other emissions units description have been modified to keep consistency with permit description format as follows:

E.U. ID No.	Brief Description
003	**One (1) Stewart Systems, Inc., Model Type Conveyorized Bun Oven (Bun Oven No. 2)** **Bun Oven installed 11/1996 and utilizes liquid brew formulas** ▪ Max Heat Input: 5.75MMBtu/hr ▪ Max Process Rate: 9,157 lb/hr ▪ Max Baked Bun Production Rate: 8,241 lb/hr (36,097 tons per year) ▪ Direct fired, natural gas 48 MMcf/yr, two exhaust stacks 32' high 1.1' diameter
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3. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Units 003 & 007. The removal of emissions unit 002 required that the following specific conditions be modified as follows:

A.1. Permitted Capacity: The maximum bread production rates, in any twelve consecutive month period, shall not exceed:

- Bread Oven (EU-007) – 45,175 tons combined sponge & straight dough bread (with a 10,000 ton limit on straight dough bread)
- Bun Oven No. 2 (EU-003) – 36,096 tons liquid-brew dough

[Rule 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0250664-007-AC]

In addition, a portion of the condition has been revised to clarify that there is a 10,000 ton limit on straight dough bread.

A.2. Methods of Operation: The natural gas utilization rate, in any twelve consecutive month period, shall not exceed:

- Bread Oven (EU-007) – 43.8 MM cu ft/yr (4.98 MM Btu/hr)
- Bun Oven No. 2 (EU-003) – 48 MM cu ft/yr (5.75 MM Btu/hr)

[Rule 62-213.410 F.A.C.; and, 0250664-007-AC]

A.4. Volatile Organic Compounds (VOC): The VOC emissions rate for the bread oven (EU -007) shall not exceed 121.9 tons in any twelve (12) consecutive month period, and, the combined total VOC emissions rate for the two (2) ovens (EU Nos. 003 & 007), shall not exceed 216.31 tons in any twelve (12) consecutive months, updated monthly.

[Rule 62-296.320(1)(a) F.A.C.; and, 0250664-007-AC]

4. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Units 003 & 007. To keep with the FDEP reformatting of the entire permit document, the following specific conditions addressing excess emissions have been added as follows:

A.5 Excess Emissions Allowed: Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C., and Permit No. 0250664-007-AC]

A.6. Excess Emissions Allowed: Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C., and Permit No. 0250664-007-AC]

A.7. Excess Emissions Prohibited: Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C., and Permit No. 0250664-007-AC]

5. Changes in Section III – Subsection B, Emissions Unit and Specific Conditions, Emissions Unit 004. To keep with the FDEP reformatting of the entire permit document, the following specific conditions addressing excess emissions have been added as follows:

A.5 Excess Emissions Allowed: Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C., and Permit No. 0250664-007-AC]

A.6. Excess Emissions Allowed: Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C., and Permit No. 0250664-007-AC]

A.7. Excess Emissions Prohibited: Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C., and Permit No. 0250664-007-AC]

6. Changes in Section III – Subsection C, Common Conditions. With the FDEP reformatting of the entire permit document, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc. Specific Conditions C.2., C.3., C.5., & C.6 were moved to Appendix TV, Appendix RR, & Facility –Wide Conditions, respectively. Specific Condition C.1. (Excess Emissions) was also removed, and placed under Emissions Units and Specific Conditions in Subsections A & B. As a result, Subsection C has been removed from the permit. In addition, Specific Condition No. C.4. has been removed since compliance tests are not required for this facility; therefore, compliance test reports are not necessary.

CONCLUSION

This project renews Title V Air Operation Permit No. 0250664-008-AV, which was issued on March 20, 2009. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.