Flowers Baking Company of Bradenton, LLC

Facility ID No. 0810164
Manatee Name County

Title V Air Operation Permit Renewal

Permit No. 0810164-006-AV
(Renewal of Title V Air Operation Permit No. 0810164-004-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, 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
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Flowers Baking Company of Bradenton, LLC
6490 Parkland Drive
Sarasota, FL 34243

Permit No. 0810164-006-AV
Facility ID No. 0810164
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing facility is located in Manatee County at 6490 Parkland Drive, Sarasota, Florida. UTM Coordinates are: Zone 17, 348.63 East and 3034.79 North. Latitude is: 27°25'41" North; and, Longitude is: 82°31'53" 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: Date, 200x
Renewal Application Due Date: Exp. Date -225, 20xx
Expiration Date: Eff. Date + 5 years, 20xx

(Draft/Proposed)

_____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

KMB/ds/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility is a commercial bakery that consists of one bread line (bread oven) and one bun line (bun oven).

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Bread Line (Bread Oven 001)
002	Bun Line (Bun Oven 002)

Note: The facility also includes four (4) flour storage silos which were previously classified as regulated emissions units (EU Nos. 003, 004, 005 and 010) but have been reclassified as insignificant emissions units.

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received on August 23, 2013, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is not 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).
State Regulations 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. 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.; Construction Permit No. 0810164-002-AC]

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.

(Permitting Note - Nothing is deemed necessary and ordered at this time)

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. Facility roadways and parking areas are paved.

b. Flour storage and handling equipment is enclosed.

c. Operation of filtration devices on each of the four silos in order to minimize flour loss as it is being pneumatically conveyed to the silos.

d. Immediate removal and disposal of any flour that may be spilled onto the concrete outside the facility during the unloading process.

(Permitting Note: The requirements listed above are "not federally enforceable")

[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees
See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report - The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. *(See also Appendix RR, Condition No. RR5.)*

[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee - The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download 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. *(See also Appendix RR, Condition No. RR6.)*
[Rule 62-213.205, F.A.C.]

FW8. 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. *(See also Appendix RR, Condition No. RR7.)*
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA) - If and when the facility becomes subject to 112(r), the permittee shall:

a. 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 to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. 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]

***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.

Subsection A. Emissions Unit Nos. 001 and 002 – Bread Line and Bun Line

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

EU ID No.	Brief Description
-001	Bread Line (Bread Oven 001): The Bread Line consists of a natural gas fired oven with a design heat input rate of 7.0 MMBTU/hr., which utilizes numerous formulas in the production of bread. The formulas in the production of bread fall into three categories; straight dough, liquid brew, and sponge dough. The total capacity of the bread oven is 55,188 tons of bread per any consecutive 12 month period. Also included are pre-baked and post-baked operations, such as mixing, dividing, proofing, depanning, cooling, slicing, and packaging.
-002	Bun Line (Bun Oven 002): The Bun Line consists of a natural gas fired oven with a design heat input rate of 6.0 MMBTU/hr., which utilizes liquid brew formulas in the production of buns. The total capacity of the bun oven is 29,534 tons of buns per any consecutive 12 month period. Also included are pre-bake and post-bake operations such as mixing, dividing, proofing, depanning, cooling, slicing, and packaging.

{Note: These emissions units (EU Nos. 001 and 002) are regulated under Rule 62-296.320, F.A.C. Compliance Assurance Monitoring (CAM), adopted and incorporated by reference in Rule 62-204.800, F.A.C., is not applicable, since there are no emission control devices.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacities.

a. The maximum allowable bread and straight dough production is limited as follows:

EU ID No.	Total Bread Production (tons per any 12-month consecutive period)	Straight Dough Bread Production (tons per any 12-month consecutive period)
001	55,188	10,000
002	29,534	n/a

b. The maximum allowable fuel usage rates are as follows:

EU ID No.	Fuel Type	Fuel Usage per any consecutive 12-month period (Million cubic ft.)
001	Natural gas	57.6
002	Natural gas	48.3

[Rules 62-4.160(2), 62-204.800, 62-210.200 (Potential to Emit)]

A.2. Methods of Operation (i.e.,Fuels) - The direct gas fired ovens used in these emissions units shall only be fired with natural gas.
[Rule 62-213.410, F.A.C.]

A.3. Hours of Operation - These emissions units may operate continuously (8,760 hours/year). **[**Rule 62-210.200 (Potential to Emit), 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.)

A.4. VOC Emissions Limitation – Volatile Organic Compound (VOC) emissions shall not exceed the following limits.

EU ID No.	VOC Emissions Limit (tons per any 12-month consecutive period)
001	152.6
002	51.1

[Rule 62-210.200 (Potential to Emit), F.A.C.; TV Renewal Permit Application dated 8/23/2013]

Recordkeeping and Reporting Requirements

A.5. **Monthly Recordkeeping Requirements** - The permittee shall keep logs for the facility to document compliance with the limitations of Conditions A.1. and A.4. The logs shall at a minimum contain the monthly and the 12 month rolling totals (12 consecutive month totals) of the following:

a. Date/Month.

b. Emission Unit No. ID.

c. Operating hours.

d. Pounds of bread products by formula (straight dough, liquid brew, and sponge dough).

e. Total pounds of all bread products.

f. Quantity of natural gas burned.

g. VOCs emitted (including emission factors used).

{Permitting note: See "AP-42, Section 9.9.6 Bread Baking" for VOC emissions factor calculation equations.}

The monthly logs shall be completed by the end of the following month. Supporting documentation (MSD sheets, purchase order, emission factors, etc.) shall be kept to provide sufficient information to determine compliance with Conditions A.1. and A.3. These records shall be kept at the facility for at least 5 years and made available to the Department upon request.

[Rule 62-213.440(1)(b)2.b. and 62-4.070(3), F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

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

Appendix RR, Facility-wide Reporting 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, Summary of Air Pollutant Standards and Terms

Table 2, Compliance Requirements