*** DRAFT PERMIT ***

PERMITTEE

Interstate Brands Corporation
2200 South Division Avenue
Orlando, FL 32805

Responsible Official:
Mr. William MacKenzie
Plant Manager

Air Permit Number: 0950364-008-AC
Permit Expires: June 30, 2013

Merita Bakery - Orlando Facility
Air Construction Permit
Title V Major Source
Project Name: Facility-wide construction permit

This is the final air construction permit, which: changes the natural gas consumption limits; reduces the facility VOC emission limit; clarifies language to make combustion equipment emissions insignificant; adds a new emission unit for Ink-Jet Printers (EU 004); and adds a new emission unit for Bread Baking Processes (EU 003) that replaces EU 001. The proposed work will be conducted at the Merita Bakery - Orlando Facility, which is a bakery facility (Standard Industrial Classification Number 2051). The facility is located in Orange County at 2200 South Division Avenue, Orlando, Florida. The Latitude / Longitude coordinates are: 28°31'07" N Latitude / 81°23'06" W Longitude. As noted in the Final Determination provided with this final permit, 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: (The following appendices are enforceable parts of this permit):
Appendix A. Citation Formats and Glossary of Common Terms
Appendix B. General Conditions
Appendix C. Common Conditions

Because of 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 construction 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, 62-213, 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 Orange County, Florida

(DRAFT)

_____ _____

Jodi D. Dittell (Date)
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) 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 _____ to the persons listed below.

William MacKenzie, Plant Manager, Interstate Brands Corp. (william.mackenzie@hostessbrands.com)
Douglas Bauman, P.E., General Civil & Environmental Engineering LLC (doug4ucf@earthlink.net)
Scott Johnson, Field Environmental Coordinator, Interstate Brands Corp. (scott.johnson@ hostessbrands.com)
Caroline Shine, Florida DEP (caroline.shine@dep.state.fl.us)
Jodi Dittell, OCEPD (jodi.dittell@ocfl.net)

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 bakery facility makes bread and rolls and packages the product for shipment to retailers. There are three production lines, each with a conveyor oven. Bread Line 1 and Bread Line 2 each consist of a production line for mixing dough, forming and baking products, cooling baked products and packaging for bread loaves. Roll Line 1 consists of a production line for mixing dough, forming and baking products, cooling baked products and packaging for hot dog rolls and similar products.

Emissions from this facility consist of VOC from the bread baking process (specifically ethanol from yeast fermentation) and VOC from combustion of natural gas in the ovens. All three production lines operate without air pollution control equipment. Bread product production and VOC emissions are limited to avoid exceeding the PSD major source threshold for VOC.

The existing regulated facility consists of one active emission unit (EU).

Facility ID Number 0950006

EU ID	Emissions Unit Description
001	Bread Lines #1 and #2 and Roll Line #1 EU 001 includes three production lines, each with a conveyor oven. The bread production for Bread Line #1 and Bread Line #2 consists of mixing, fermenting, mixing, dividing, proofing, baking fired by natural gas, cooling, and packaging in each line. The roll production for Roll Line #1 consists of mixing, dividing, proofing, baking fired by natural gas, cooling, and packaging. There is no air pollution control equipment.

Insignificant Emission Units and Activities

Insignificant emission units and activities listed in permit 0950364-006-AV include:

1. Three natural gas-fired boilers: two 2.5 MMBTU/hr and one 8.34 MMBTU/hr,
2. Space heaters,
3. Ink-jet printers – ink,
4. Ink-jet printers – makeup,
5. Gas combustion side (burners) of Bread Line Ovens #1 and #2, and gas combustion side (burners) of Roll Line #1 Oven,
6. Four Flour Silos with bin-vent filters (within building) and flour management system (within building).

No Wheat Flour Silo with Bin-Vent Filter is listed in the 0950364-006-AV permit, but this equipment has been operational at the facility since 2006 or earlier.

Project Description

This facility-wide construction permit supersedes all previous permits.

This construction permit was processed concurrently with the renewed and revised Title V operation permit 0950364-007-AV.

This construction permit authorizes no new construction.

This project is an air construction permit that authorizes the following facility modifications.

1. Remove the limitations on natural gas consumption of Bread Line 1, Bread Line 2 and Roll Line 1 in permit 0950364-006-AV condition A2 and replace with a facility-wide natural gas consumption limit of 85 million cubic feet per consecutive 12 months. This modification allows natural gas-fired equipment to meet the insignificant source requirements of Rule 62-213.430(6), F.A.C. Compliance is demonstrated using the facility's only gas meter.

2. Create a new emission unit, "EU 003 – Bread Baking Processes" for VOC emissions from the baking process. The ovens and other combustion equipment are insignificant sources. The old EU 001, Bread Lines #1 and #2 and Roll Line #1, is reclassified as inactive.
3. Remove the existing Ink jet printers - ink and Ink-jet printers – makeup from the insignificant sources list and place them in a regulated emission unit, "EU 004 – Ink Jet Printers". Add recordkeeping for the printer ink and makeup usages so VOC emissions can be determined and added to the VOC from the baking process to determine facility-wide VOC emissions.
4. Add "Wheat Flour Silo with Bin-Vent Filter" to the list of Insignificant Sources. Add a specific condition requiring the facility to maintain the bin-vent filter atop the wheat flour silo in good working order.
5. Remove specific condition A5 in permit 0950364-006-AV, regarding visible emissions limits. There are no visible emission limits or compliance test requirements for insignificant emission units or activities.
6. Reduce the facility-wide VOC emission limit from 249 tons per consecutive 12 months to 230 tons per consecutive 12 months.

The modified facility consists of two regulated emission units, with insignificant emission units or activities that meet the requirements of Rule 62-213.430(6), F.A.C., listed in the Title V operation permit 0950364-007-AV, Appendix I.

Facility ID Number 0950364

EU ID	Emission Unit Description
003	<u>Bread Baking Processes</u> Bread Baking Processes emit VOC produced by yeast fermentation. This emission unit consists of the bread baking processes in Bread Line 1, Bread Line 2 and Roll Line 1. Bread Line 1 and Bread Line 2 each consist of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for bread loaves. Roll Line 1 consists of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for hot dog rolls and similar products.
004	<u>Ink-Jet Printers</u> The facility uses ink-jet printers for printing dates and other product information on individual packages. All production lines use the printers, and there is a total of seventeen ink-jet printers at the facility. This emission unit includes printer inks and all related products containing VOC and HAP.

FACILITY REGULATORY CLASSIFICATION

- The facility is a Title V source of VOC.
- The facility is not a major source of hazardous air pollutants (HAP).
- 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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

1. Permitting & Compliance Authority: The permitting authority for this project is the Orange County Environmental Protection Division (EPD). All documents related to applications for permits to operate emission units and compliance activities such as reports, tests, and notifications shall be submitted to EPD. The mailing address and phone number of the EPD is 800 Mercy Drive, Orlando, FL 328088 and 407-836-1400.

2. 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.

3. 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.; Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.; and Orange County Ordinances Chapter 15 Article III. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

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

5. Modifications: The permittee shall notify the EPD upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from EPD. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

6. Source Obligation:
   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

7. Application for Operation Permit: This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with EPD rules. A Title V operation permit is required for regular operation of the permitted emissions units. The construction permit application and the Title V operation permit application were processed concurrently, so no other permit application for the proposed modifications is required. [Rules 62-4.030, 62-4.050, 62-4.220, 62-213.420, F.A.C.]

This section of the permit addresses the following emission units and the facility.

Facility ID Number 0950364	
EU ID	**Emission Unit Description**
003	Bread Baking Processes Bread Baking Processes emit VOC produced by yeast fermentation. This emission unit consists of the bread baking processes in Bread Line 1, Bread Line 2 and Roll Line 1. Bread Line 1 and Bread Line 2 each consist of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for bread loaves. Roll Line 1 consists of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for hot dog rolls and similar products.
004	Ink-Jet Printers The facility uses ink-jet printers for printing dates and other product information on individual packages. All production lines use the printers, and there is a total of seventeen ink-jet printers at the facility. This emission unit includes printer inks and all related products containing VOC and HAP.

OPERATING RESTRICTIONS

1. Hours of Operation: The facility is permitted to operate continuously. [Rule 62-210.200, (Potential to Emit), F.A.C., Construction permit application received June 14, 2012]

2. Permitted Capacity. The maximum permitted production rates are:
   a. 65.28 million pounds of breads per consecutive twelve months for Bread Line 1;
   b. 88.12 million pounds of breads per consecutive twelve months for Bread Line 2;
   c. 23.74 million pounds of rolls per consecutive twelve months for Roll Line 1..
   [Rule 62-210.200, (Potential to Emit), F.A.C., and Construction permit application received June 14, 2012]

3. VOC and Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPD. To comply, procedures to minimize pollutant emissions shall include the following:
   a. Tightly cover or close all VOC containers when they are not in use;
   b. Maintain all piping, valves, fittings, etc. in good operating condition;
   c. Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.
   [Rule 62-296.320(1)(a), F.A.C.; Construction permit application received June 14, 2012]

4. 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. Paving and maintenance of roads, parking areas and yards.
   b. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   c. Use of filters, enclosures and similar equipment to contain, capture and/or vent particulate matter.
   d. Enclosure or covering of conveyor systems and loading and offloading areas.
   [Rule 62-296.320(4)(c), F.A.C.; Construction permit application received June 14, 2012]

5. Natural Gas Consumption. The facility-wide natural gas consumption is limited to no more than 85 million cubic feet per consecutive twelve months. [Construction permit application received June 14, 2012]

6. Bin Vent Filter. The facility shall maintain the bin-vent filter atop the wheat flour silo in good working order. [Construction permit application received June 14, 2012]

EMISSIONS STANDARDS

7. VOC Emissions. The emissions of volatile organic compounds and organic solvents, as defined in Chapter 62-213, F.A.C., from the sources at the facility shall not exceed 230.0 tons per consecutive twelve months. [Rule 62-210.200, (Potential to Emit), F.A.C., Construction permit application received June 14, 2012]

RECORDS AND REPORTS

8. Emissions Calculations: The VOC emissions (pounds) from bread production shall be calculated by multiplying the amount of bread produced (in tons) by the VOC Emission Factor (pounds VOC per ton of bread produced) calculated from the following equation listed in Compilation of Air Pollutant Emission Factors, AP-42 Section 9.9.6 Bread Baking. The equation can also be found in "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992). The equation is:

   VOC E.F. = 0.95Yi+0.195ti-0.51S-0.86ts+1.90

   Where:
   VOC E.F. = pounds VOC per ton of baked bread
   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

   Where no final (spike) yeast is added, the equation condenses to:
   VOC E.F. = 0.95 Yi+0.195ti+1.90

   Merita may use the following nomenclature:
   Yi = initial baker's percent of yeast (Sponge % Yeast)
   Ti = total yeast action time in hours (Ferment + Proof + Floor Time)
   S = final (spike) baker's percent of yeast (Dough % Yeast)
   ts = spiking time in hours (Proof + Floor Time)

   [Rule 62-210.200, (Potential to Emit), F.A.C., and Construction permit application received June 14, 2012]

9. Recordkeeping Log. A log shall be kept for this facility to document compliance with conditions 2, 5 and 7 of this permit. All records shall be maintained onsite in either paper copy or computer-readable format. The log shall be kept on file at the facility for at least five years. The monthly logs shall be completed by the end of the following month. The log shall contain the following:
   a. Calendar date for which records are being tabulated;
   b. Monthly and consecutive twelve month totals of bread production for each of the three production lines;
   c. Monthly and consecutive twelve month totals of VOC emissions from bread production;
   d. Monthly and consecutive twelve month totals of ink-jet printer ink and ink-related products used, and ink and ink-related products VOC emissions;
   e. Monthly and consecutive twelve month totals of facility-wide VOC emissions;

f. Monthly and consecutive twelve month totals of facility-wide natural gas consumption.
[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C., Construction permit application received June 14, 2012]

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-297.310(8), F.A.C.]

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located

"2222" represents the specific facility ID number for that county

"001" identifies the specific permit project number

"AC" identifies the permit as an air construction permit

"AF" identifies the permit as a minor source federally enforceable state operation permit

"AO" identifies the permit as a minor source air operation permit

"AV" identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality

"FL" means that the permit was issued by the State of Florida

"317" identifies the specific permit project number

Florida Administrative Code (F.A.C.)

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

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

Citation Formats and Glossary of Common Terms

CFR: Code of Federal Regulations

CAA: Clean Air Act

CMS: continuous monitoring system

CO: carbon monoxide

CO_2: carbon dioxide

COMS: continuous opacity monitoring system

DARM: Division of Air Resource Management

DEP: Department of Environmental Protection

Department: Department of Environmental Protection

dscf: dry standard cubic feet

dscfm: dry standard cubic feet per minute

EPA: Environmental Protection Agency

EPD: Orange County Environmental Protection Division

ESP: electrostatic precipitator (control system for reducing particulate matter)

EU: emissions unit

F.A.C.: Florida Administrative Code

F.A.W.: Florida Administrative Weekly

F.D.: forced draft

F.S.: Florida Statutes

FGD: flue gas desulfurization

FGR: flue gas recirculation

Fl: fluoride

ft^2: square feet

ft^3: cubic feet

gpm: gallons per minute

gr: grains

HAP: hazardous air pollutant

Hg: mercury

I.D.: induced draft

ID: identification

kPa: kilopascals

lb: pound

MACT: maximum achievable technology

MMBtu: million British thermal units

MSDS: material safety data sheets

MW: megawatt

NESHAP: National Emissions Standards for Hazardous Air Pollutants

NO_X: nitrogen oxides

NSPS: New Source Performance Standards

O&M: operation and maintenance

O_2: oxygen

Pb: lead

PM: particulate matter

PM_{10}: particulate matter with a mean aerodynamic diameter of 10 microns or less

ppm: parts per million

ppmv: parts per million by volume

ppmvd: parts per million by volume, dry basis

QA: quality assurance

QC: quality control

PSD: prevention of significant deterioration

psi: pounds per square inch

PTE: potential to emit

RACT: reasonably available control technology

RATA: relative accuracy test audit

RBLC: EPA's RACT/BACT/LAER Clearinghouse

RICE: reciprocating internal combustion engine

SAM: sulfuric acid mist

scf: standard cubic feet

scfm: standard cubic feet per minute

SIC: standard industrial classification code

SIP: State Implementation Plan

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

SO_2: sulfur dioxide

TPD: tons/day

TPH: tons per hour

TPY: tons per year

TRS: total reduced sulfur

UTM: Universal Transverse Mercator coordinate system

VE: visible emissions

VOC: volatile organic compounds

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. 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 EPD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. 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 EPD.
3. 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 EPD permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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.
5. 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 Florida Statutes and EPD rules, unless specifically authorized by an order from FDEP and EPD.
6. 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 EPD 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 EPD rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized EPD 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:
   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or EPD rules. Reasonable time may depend on the nature of the concern being investigated.
8. 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 EPD with the following information:
   a. A description of and cause of noncompliance; and
   b. 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 EPD for penalties or for revocation of this permit.

9. 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 EPD may be used by EPD as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or EPD 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.

10. The permittee agrees to comply with changes in EPD 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 EPD rules.

11. This permit is transferable only upon EPD approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by EPD.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:
    a. Determination of Best Available Control Technology (not applicable);
    b. Determination of Prevention of Significant Deterioration (not applicable); and
    c. Compliance with New Source Performance Standards (not applicable).

14. The permittee shall comply with the following:
    a. Upon request, the permittee shall furnish all records and plans required under EPD rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by EPD.
    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 three years from the date of the sample, measurement, report, or application unless otherwise specified by EPD rule.
    c. Records of monitoring information shall include:
        (a) The date, exact place, and time of sampling or measurements;
        (b) The person responsible for performing the sampling or measurements;
        (c) The dates analyses were performed;
        (d) The person responsible for performing the analyses;
        (e) The analytical techniques or methods used;
        (f) The results of such analyses.

15. When requested by EPD, 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 EPD, such facts or information shall be corrected promptly.

16. All air pollution sources located in Orange County are subject to the Orange County Code of Ordinances, including Chapter 15, Article III, Air Quality Control.

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify EPD as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future 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 the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]

2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]

3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by EPD for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]

4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by EPD. [Rule 62-210.700(6), F.A.C.]

6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by EPD. [Rule 62-296.320(1), F.A.C.]

7. 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. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

8. 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. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to EPD upon request. [Rule 62-213.440(1)(b)2, F.A.C.]

11. Supporting Documentation: Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products, which includes sufficient information to determine usage rates and emissions. These records shall be made available to EPD upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage and emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years. Daily logs shall be completed within 7 business days. [Rule 62-4.070(3), F.A.C.]

12. Emissions Computation and Reporting:

    a. *Applicability*. This rule sets forth required methodologies 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 this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

    b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

        (1) 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.

            (a) 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 EPD that an alternative approach is more accurate because the CEMS represents still-emerging technology.

            (b) 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 EPD that an alternative approach is more accurate.

            (c) 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 EPD that an alternative approach is more accurate.

(2) Mass Balance Calculations.

(a) 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:

1) 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

2) 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.

(b) 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.

(c) 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.

(3) Emission Factors.

a. 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 EPD 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.

1) 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.

2) 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.

3) 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.

b. 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.

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

(5) 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.

(6) 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.

(7) 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 EPD for any regulatory purpose.

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

c. *Annual Operating Report for Air Pollutant Emitting Facility*

(1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:

a. All synthetic non-Title V sources.

b. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.

(2) The annual operating report shall be submitted to EPD by April 1 of the following year. If the report is submitted using the FDEP electronic annual operating report software, there is no requirement to submit a copy to EPD.

(3) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.

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

d. *Facility Relocation.* Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to EPD at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(4), F.A.C.]

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

APPLICANT

Interstate Brands Corporation
2200 South Division Avenue
Orlando, FL 32805

Facility ID Number 0950364

PROJECT

Application for Title V Source Air Construction Permit
Project Number: 0950364-008
Project Name: Facility-Wide Construction Permit

PERMITTING AUTHORITY

Orange County Environmental Protection Division
Air Quality Management
800 Mercy Drive
Suite 4
Orlando, Florida 32808

September 4, 2012

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

In accordance with the terms of its Specific Operating Agreement, the Orange County Environmental Protection Division (EPD) has been delegated the authority to process this application on behalf of the Department.

Glossary of Common Terms

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

Facility Description and Location

The Merita Bakery - Orlando Facility is an existing Title V source, which is categorized under Standard Industrial Classification Code Number 2051 for Bread and Other Bakery Products, Except Cookies and Crackers. The facility is located in Orange County at 2200 South Division Avenue in Orlando, Florida. The latitude and longitude of the site are 28°31’07” N Latitude, 81°23’06” W Longitude, respectively. This site is in an area that is in attainment (Orange County is an attainment maintenance area) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a Title V source of VOC.
- The facility is not a major source HAP.
- The facility has no emission units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

This facility-wide construction permit supersedes all previous permits.

This construction permit was processed concurrently with the renewed and revised Title V operation permit 0950364-007-AV.

This construction permit authorizes no new construction.

This project is an air construction permit that authorizes the following facility modifications.

1. Remove the limitations on natural gas consumption of Bread Line 1, Bread Line 2 and Roll Line 1 in permit 0950364-006-AV condition A2 and replace with a facility-wide natural gas consumption limit of 85 million cubic feet per consecutive 12 months. This modification allows natural gas-fired equipment to meet the insignificant source requirements of Rule 62-213.430(6), F.A.C. Compliance is demonstrated using the facility's only gas meter.
2. Create a new emission unit, "EU 003 – Bread Baking Processes" for VOC emissions from the baking process. The ovens and other combustion equipment are insignificant sources. The old EU 001, Bread Lines #1 and #2 and Roll Line #1, is reclassified as inactive.
3. Remove the existing Ink jet printers - ink and Ink-jet printers – makeup from the insignificant sources list and place them in a regulated emission unit, "EU 004 – Ink Jet Printers". Add recordkeeping for the printer ink and makeup usages so VOC emissions can be determined and added to the VOC from the baking process to determine facility-wide VOC emissions.
4. Add "Wheat Flour Silo with Bin-Vent Filter" to the list of Insignificant Sources. Add a specific condition requiring the facility to maintain the bin-vent filter atop the wheat flour silo in good working order.
5. Remove specific condition A5 in permit 0950364-006-AV, regarding visible emissions limits. There are no visible emission limits or compliance test requirements for insignificant emission units or activities.
6. Reduce the facility-wide VOC emission limit from 249 tons per consecutive 12 months to 230 tons per consecutive 12 months.

The modified facility consists of two regulated emission units, with insignificant emission units or activities that meet the requirements of Rule 62-213.430(6), F.A.C., listed in the Title V operation permit 0950364-007-AV, Appendix I.

Facility ID Number 0950364

EU ID	Emission Unit Description
003	<u>Bread Baking Processes</u> Bread Baking Processes emit VOC produced by yeast fermentation. This emission unit consists of the bread baking processes in Bread Line 1, Bread Line 2 and Roll Line 1. Bread Line 1 and Bread Line 2 each consist of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for bread loaves. Roll Line 1 consists of a conveyor oven production line for mixing, fermenting, dividing, proofing, baking, cooling and packaging for hot dog rolls and similar products.
004	<u>Ink-Jet Printers</u> The facility uses ink-jet printers for printing dates and other product information on individual packages. All production lines use the printers, and there is a total of seventeen ink-jet printers at the facility. This emission unit includes printer inks and all related products containing VOC and HAP.

Processing Schedule

06/14/12	Received the application for a Title V source air construction permit, starting the permit clock
07/13/12	Application review results: application complete.
09/04/12	Mail Written Notice of Intent to Issue Air Permit, Public Notice of Intent to Issue Air Permit, and Draft Construction Permit

2. PSD APPLICABILITY

This is a Title V source construction permit project that reduces existing permit limits on emissions. PSD does not apply to this minor source.

3. APPLICATION REVIEW

Discussion of Emissions

This facility-wide construction permit authorizes no new construction but addresses changes to emission units to clarify permit requirements and emission sources.

Natural Gas Consumption

Permit 0960364-006-AV contained limits on the natural gas burned in each of the three conveyor ovens, but the oven burners were listed as insignificant sources. Each of the ovens individually meet the requirements for insignificant sources in Rule 62-213.430(6), F.A.C., but combined (as in EU 001) they do not when operated continuously at rated capacity. Natural gas-fired boilers and space heaters were also listed as insignificant sources, and individually they meet the requirements for insignificant sources in Rule 62-213.430(6), F.A.C. Thus, in the 0950364-006-AV permit there were regulated and insignificant natural gas-fired sources. However, the facility only has one gas meter. This situation made recordkeeping difficult. Recordkeeping was simplified by removing the limitations on natural gas consumption of ovens for Bread Line 1, Bread Line 2 and Roll Line 1, and replacing it with a facility-wide natural gas consumption limit of 85 million cubic feet per consecutive 12 months. This modification allows all natural gas-fired equipment to meet the insignificant source requirements of Rule 62-213.430(6), F.A.C., as shown in the table below comparing potential emissions using AP-42 emission factors and insignificant source potential emission limits.

Table 1. Potential Emissions for All Natural Gas-Fired Combustion Sources.

Pollutant	Emission Factor, lb/MMCF	Natural Gas Limit, MMCF/yr	Potential Emissions, TPY	Potential Emission Limits for Insignificant Sources, TPY
NOx	100	85	4.3	5.0
CO	84	85	3.6	5.0
VOC	5.5	85	0.2	5.0
PM/PM10	7.6	85	0.3	5.0
SO2	0.6	85	0.0	5.0

New EU 003 – Bread Baking Processes

Emissions from the bread baking process are primarily VOC (ethanol) from the fermentation of yeast (SIC Code 30203201). These bread baking emissions are separated from the insignificant source oven

burner combustion emissions (SIC Code 10200603) and placed in a new emission unit, EU 003. Emissions from EU 003 are calculated using the bread and roll production limits (unchanged from the 0950364-006-AV permit) and the bread baking VOC emission factor from AP-42 section 9.9.6. The old EU 001, Bread Lines #1 and #2 and Roll Line #1, is reclassified as inactive in the ARMS database.

EU 004 – Ink Jet Printers

The facility uses ink-jet printers for printing dates and other product information on individual packages. All production lines use the printers, and there is a total of seventeen ink-jet printers at the facility. The permittee requested that EPD remove the existing ink jet printers from the insignificant sources list and place this VOC emission source in a separate regulated emission unit. The EPD removed both the Ink jet printers - ink and Ink-jet printers – makeup activities from the insignificant sources list and placed them in a new regulated emission unit, "EU 004 – Ink Jet Printers". This emission unit contains all sources related to the ink jet printers, including printer inks and all related products containing VOC and HAP. The EPD also added recordkeeping for the printer ink and related product usages so VOC and HAP emissions can be determined. The printer-related emissions will be added to the VOC from the baking process to determine facility-wide VOC emissions.

Wheat Flour Silo with Bin-Vent Filter

The facility has four bread flour silos with bin-vent filters, connected to a flour management system and located inside the building. These silos were installed many years ago and are listed as insignificant sources. The facility added a wheat flour silo with a bin-vent filter before 2006, but was not listed in the 0950364-006-AV permit. This silo is located outside the building. The silo and bin-vent filter are listed as an insignificant source. However, the EPD added a specific condition requiring the facility to maintain the bin-vent filter atop the wheat flour silo in good working order.

Specific Condition A5 in Permit 0950364-006-AV

Specific condition A5 in permit 0960364-006-AV refers to "The visible emission limitation for the other emission units …", but it is not clear what those emission units are. There is only one emission unit in that permit. The rest of the facility sources were insignificant, except possibly the oven burners. It is not clear that the oven burners were intended to be regulated in that permit because they were listed as insignificant. The oven burners have been classified as insignificant in this permit to clarify that issue. There is no compliance test requirement for insignificant sources. The only regulated emission units in this permit are EU 003, Bread Baking Processes, and EU 004, Ink-Jet Printers. There is no compliance test requirement for EU 003 because these VOC emissions are invisible. There is no compliance test requirement for EU 004 because the printers operate inside the building and these VOC emissions are also invisible. In summary, there is no visible emission limitation or compliance test requirement in this permit. The EPD therefore removes specific condition A5 in permit 0950364-006-AV from later permits.

Reduce the Facility-Wide VOC Emission Limit

Permit 0950364-006-AV limited emissions of VOC and organic solvents (OS) to 249.0 tons per consecutive 12 months. The PSD threshold is 250 tons per consecutive 12 months, leaving only 1.0 ton per consecutive 12 months for VOC and OS emissions from insignificant sources. The EPD and the applicant judged this margin to be insufficient to avoid possible emissions exceeding the PSD threshold. Consequently, the applicant requested the facility-wide VOC (including OS) emission limit be reduced from 249 tons per consecutive 12 months to 230 tons per consecutive 12 months.

The facility remains a Title V source not subject to PSD, as shown in Table 2.

Table 2. Emissions Summary Merita Bakery - Orlando.

Pollutant	Potential to Emit, EU 003 and EU 004, TPY	Potential to Emit, Insignificant Combustion Equipment, TPY	PSD Thresholds, TPY
VOC	230	0.2	250
NOx	0	4.3	250
CO	0	3.6	250
PM/PM10	0	0.3	250
SO2	0	0.0	250

State Requirements

62-4.070(3) Permit standards
62-210.200 Definitions
62-210.370 Emissions computation and reporting
62-210.370(3) AOR requirements
62-296.320(1) VOC handling requirements
62-296.320(2) Objectionable odor prohibition
62-296.320(4) Unconfined particulate matter
62-213.440(1) (b) Monitoring and related recordkeeping and reporting requirements

Federal NSPS Provisions

None.

Federal NESHAP Provisions

None.

Other Federal Provisions

40 CFR Part 82, Subpart F – Recycling and Emissions Reduction. This regulation requires facilities which have bakery industrial process appliances containing 50 pounds or more of Ozone-Depleting Substance (ODS) refrigerants to maintain records of leaks and proof that the leak was repaired within the time limits specified in the regulation. Leaking appliances that cannot be fixed must be replaced or shut down. The facility is not subject to the requirement if an acceptable replacement for the refrigerant is used.

Other Draft Permit Requirements

Orange County Ordinance Chapter 15 Article III

4. PRELIMINARY DETERMINATION

The EPD makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. John Kasper is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Orange County Environmental Protection Division, 800 Mercy Drive, Suite 4, Orlando, Florida 32808, 407-836-1400.