Title V Air Operation Permit Renewal
FINAL Permit No. 1050325-008-AV

APPLICANT

The applicant for this project is Southern Bakeries, Inc. The applicant's responsible official and mailing address are: Mr. Douglas Wimberly, President, Southern Bakeries, Inc., 3355 West Memorial Boulevard, Lakeland, Florida 33815-1084.

FACILITY DESCRIPTION

The applicant operates the ButterKrust Bakeries facility, which is located at 3355 West Memorial Boulevard in Lakeland, Florida.

This facility consists of four baking lines for yeast-based products, four natural gas-fired ovens and eight flour storage silos. The baking lines are a source of fugitive volatile organic compounds (VOC) and hazardous air pollutants (HAP). Each flour silo is equipped with either a baghouse or a canister type filter to control particulate matter (PM) emissions.

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

PROJECT DESCRIPTION

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

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued May 22, 2006
Title V Air Operation Permit Revision issued June 20, 2008
Application for a Title V Air Operation Permit Renewal received September 24, 2010

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 Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C. The facility is a synthetic PSD-minor source for volatile organic compounds (VOC) as requested through Air Construction Permit 1050325-007-AC.

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 to any of the units at the facility.

{Note: Emissions Unit Nos. 001, 002, 003 and 004 each includes a baking oven and shares a multi emissions unit combined VOC emissions limit; however, these units do not use control devices to achieve compliance with the VOC emissions limit and therefore are not subject to CAM. Emissions Unit No. 005 consists of eight flour storage silos controlled by a bag house. Emissions Unit No. 005 is not subject to CAM because the silo baghouses are considered process equipment.}

PROJECT REVIEW

This renewal project included the following listed changes:

1. A newer version of Appendix TV-6 dated 11/10/2008 replaced the older version dated 6/23/06.
2. Table 1-1, "Summary of Air Pollutant Standards and Terms" and Table 2-1, "Summary of Compliance Requirements" was not included in the renewal permit. These tables were included in previous Title V permits but only contained two items. These tables are optional and are only useful for large facilities with numerous emissions unit, pollutants and compliance requirements.
3. A permitting note was added below the Emission Limits (Specific Condition A.3.) of the renewal permit. The purpose of the note was to make it clear that the ovens emit only one Individual HAP (acetaldehyde) that exceeds the minimum permitting thresholds. This should make it clear that multiple Individual HAPs are not emitted and therefore the facility is not a major source of Total HAPs.

The List of Insignificant Emissions Units and/or Activities (Appendix I-1) was revised to include a new 10,000 gallon diesel fuel storage tank used for fleet fueling. This tank was added in September of 2010.

CONCLUSION

This project renews Title V air operation permit No. 1050325-006-AV, which was issued on August 18, 2008. 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, 62-213, F.A.C.