Southern Bakeries, Inc.
d/b/a ButterKrust Bakeries
Facility ID No.: 1050325
Polk County

Title V Air Operation Permit Renewal

FINAL Permit Project No.: 1050325-008-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

Title V Air Operation Permit Renewal

FINAL Permit No.: 1050325-008-AV

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- Statement of Basis

Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

Permittee:
Southern Bakeries, Inc.
d/b/a ButterKrust Bakeries
3355 West Memorial Boulevard
Lakeland, Florida 33815-1084

FINAL Permit No.: 1050325-008-AV
Facility ID No.: 1050325
SIC No(s).: 20, 2051
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit. This existing facility is located at 3355 West Memorial Boulevard, Lakeland, Polk County; UTM Coordinates: Zone 17, 403.9 km East and 3102.9 km North; and, Latitude: 28° 03' 14" North and Longitude: 82° 00' 30" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix TV-6, Title V Conditions (version dated 11/10/08)

Effective Date: January 26, 2011
Renewal Application Due Date: June 15, 2015
Expiration Date: January 26, 2016

_____
Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/ds/pp

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of four baking lines for yeast-based products, four natural gas-fired ovens and eight flour storage silos.

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

Based on the Title V Air Operation Permit Renewal application received September 24, 2010, this facility is a Title V source and a synthetic non-PSD source for volatile organic compounds (VOCs).

Based on the Title V Air Operation Permit Renewal application received September 24, 2010, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
-001	Oven No. 1 - Line 1 Continuous Bread Baking Oven
-002	Oven No. 2 - Line 2 Continuous Bread Baking Oven
-003	Oven No. 3 - Line 3 Continuous Bun Baking Oven
-004	Oven No. 4 - Line 4 Continuous Bun Baking Oven
-005	Eight (8) Flour Storage Silos

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

These documents are on file with the permitting authority:
Application for a Title V Air Operation Permit Renewal received September 24, 2010

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. 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 is 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 62-210.200 (Definition "Objectionable Odor") and 62-296.320(2), F.A.C.; 1050325-007-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. 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

and,

b. The permittee shall 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]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

a. Maintain tightly fitting covers, lids, etc, on all containers of OS/VOCs when they are not being handled, tapped, etc.;

b. Prevent excessive air turbulence across exposed OS/VOCs;

c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of OS/VOCs so that it can be covered when not in use;

d. All fittings, valve lines, etc., shall be properly maintained; and

e. All OS/VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1050325-007-AC]

7. General Pollutant Emission Limiting Standards - Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined (fugitive) emissions of PM at this facility. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing, and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include the following (See also Condition 57. of Appendix TV-6, Title V Conditions):

a. Normal "good housekeeping procedures" shall be used as needed;

b. Facility roadways and parking areas are paved;

c. Flour storage silos with filter bags on exhausts;

d. Flour is unloaded from transport trucks to silos by pneumatic conveyance; and

e. The flour and sugar storage and handling equipment are enclosed.

[Rule 62-296.320(4)(c)2., F.A.C.; Construction Permit No. 1050325-007-AC]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (See Condition 51. of Appendix TV-6, Title V Conditions)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the to the Air Compliance Section of the Department's Southwest District Office at the addresses shown below:

Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency, Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

13. 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.]

{Permitting Note: See Condition 24(3). Of Appendix TV-6, Title V Conditions}

14. Change in Operation. Any proposed change to this source that will cause the limitations of this permit to be exceeded, such as design-parameter changes or an increase in emissions may be considered a modification and must be reported. The permittee shall notify the Air Permitting Section of the Department's Southwest District Office of any changes that may reasonably be expected to increase actual emissions and receive written approval from the Permitting Section of the Department's Southwest District Office of the changes prior to implementing the changes.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.; Construction Permit No. 1050325-007-AC]

15. Excess Emissions. 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.]

16. Department Required Tests. If the Department has reason to believe that any applicable emission standard is being violated, then the Department may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

17. Record Retention. All of the records required by this facility shall be kept for the most recent five-year period and made available to the Department upon request. Monthly records/logs required by this permit shall be completed by the end of the following month.
[Rules 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C.; Construction Permit 1050325-007-AC]

{Permitting Note: See Condition No. 12.(14)(b) and (c) and 43. of Appendix TV-6, Title V Conditions for additional recordkeeping requirements.}

18. Permit Renewal. An application for renewal of this permit shall be submitted no later than 225 days before the expiration date of this permit.
[Rule 62-213.420(1)(a)2., F.A.C.]

{Permitting Note: See Condition No. 5. of Appendix TV-6, Title V Conditions}

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-001	Oven No. 1 - Line 1 Continuous Bread Baking Oven
-002	Oven No. 2 - Line 2 Continuous Bread Baking Oven
-003	Oven No. 3 - Line 3 Continuous Bun Baking Oven
-004	Oven No. 4 - Line 4 Continuous Bun Baking Oven

Baking Lines Nos. 1, 2, 3, and 4 consist of natural gas direct-fired ovens with design heat input rates of 13.17 MMBtu per hour, 6.0 MMBtu/hr, 5.64 MMBtu/hr, and 6.0 MMBtu/hr, respectively, which bake bread and rolls/buns (by sponge-dough process (Oven Nos. 1 and 2) or liquid fermentation (Oven Nos. 3 and 4)). Each of the baking lines is associated with a production line that consists of mixing, proofing, baking, cooling and packaging. The ovens will produce a variety of bread products utilizing several different formulas. These include leavened products in which cream yeast, water and minor ingredients are added to flour in a fermentation process.

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Methods of Operation. The direct gas-fired baking ovens shall be fired with natural gas only.
[Rule 62-213.410, F.A.C.; Construction Permit 1050325-007-AC]

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1050325-007-AC]

Emission Limitations and Standards

A.3. Emission Limits**.** HAP and VOC emissions from current Baking Lines Nos. 1, 2, 3, and Line 4 combined (including gas-fired ovens) shall not exceed the following limitations:

Pollutant	Facility-Wide Emission Limits (tons per any consecutive 12 month period)
Total Volatile Organic Compounds (VOC)	200.0
Individual Hazardous Air Pollutants (HAP)	9.9

{Permitting Note: The Individual HAP limit listed in the table above is intended for the individual HAP, acetaldehyde. Acetaldehyde is the primary HAP emitted from the ovens and is the only HAP emitted from the oven that will potentially exceed the minimum permitting threshold.}

[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Construction Permit No. 1050325-007-AC]

{Production Capacity Note: There is no specific limitation on the maximum permitted process/operation rate for any of the Ovens/Lines. This gives the permittee flexibility to vary production rates of various lines and various products within the constraint of maintaining compliance with the VOC and HAP limits. Compliance with the VOC/HAP limitations is based upon emissions calculations using the production rates of various products and their associated AP-42 based VOC emission factors.}

Recordkeeping and Reporting Requirements

A.4. Hazardous Air Pollutant and Volatile Organic Compound Records**.** The permittee shall keep logs for the facility to document compliance with the HAP and VOC limitations of Specific Condition No. A.3. The logs shall at a minimum contain the following:

a. Facility Name, Emission Unit ID No. and Description;

b. Month, year, and method used for records (e.g. production volume);

c. The formula type and pounds of each bread product produced for each baking line;

d. For each month, the cumulative production rate (in tons) of each bread product;

e. The VOC Emission Factor parameters for each formula, including:

   1) Initial baker's percent of yeast, to the nearest tenth of a percent;

   2) Total yeast action time in hours, to the nearest tenth of an hour;

   3) Final (spike) baker's percent of yeast, to the nearest tenth of a percent; and

   4) Spiking time, in hours, to the nearest tenth of an hour;

f. The monthly total quantity, in tons, for total VOC emissions* and individual HAP emissions** from each baking line (including the gas-fired ovens); and

g. The most recent consecutive 12-month total quantity, in tons, for individual HAP and total VOC emissions from Baking Line Nos. 1, 2, 3, and 4.

Supporting documentation (e.g. Material Safety Data Sheets (MSDS), purchase orders, emission factors, etc.) shall be kept to provide sufficient information to determine emissions. These records shall be made available to the Department upon request.

* VOC Emissions from the baking process shall be determined using the equation below (reference: EPA AP-42 Chapter 9.9.6 Bread Baking) or other factors agreed to in writing by the Air Permitting Section of the Department's Southwest District Office.

$$\text{VOC Emission Factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

Where:

VOC E.F.	= pounds VOC per ton of baked bread
Y_i	= initial baker's percent of yeast, to the nearest tenth of a percent
t_i	= total yeast action time, in hours, to the nearest tenth of an hour
S	= final (spike) baker's percent of yeast, to the nearest tenth of a percent
t_s	= spiking time in hours, to the nearest tenth of an hour

VOC Emissions (in pounds), for each individual bread type, are equal to the calculated VOC Emission Factor for that bread type multiplied by the amount (in tons) of that individual

bread type produced. Total VOC emissions shall be the sum of VOC emissions from the baking process and VOC emissions from the gas-fired ovens.

** Acetaldehyde (the primary HAP emitted from the ovens) emissions (in tons) = Total VOC (in tons) x 0.03474 (*unless otherwise notified of another emission factor by the Department*).

[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.; Construction Permit No. 1050325-007-AC]

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-005	Eight (8) Flour Storage Silos

Eight (8) storage silos are used for containing flour. Silo Nos. 1-6 are each equipped with a separate baghouse to control particulate matter (PM) emissions. These baghouses consist of Parker Sales silo bag no. 156C x 77 with strap-top (Part No. NGDTR1). Silo Nos. 7 and 8 are each equipped with a separate Schiek canister-type Tubeveyor Filter (Part No. 15307).

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C. Construction Permit 1050325-007-AC]

B.2. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable control device operating properly.
[Rule 62-210.650, F.A.C.]

Emission Limitations and Standards

B.3. Silo Loading Limitation. The sum total loading rate for all eight (8) flour loading silos combined shall not exceed 80,000 tons per any consecutive 12-month period.
[Rules 62-4.070(3) and 62-210.200 (Definition "Potential to Emit"), F.A.C.; Construction Permit No. 1050325-007-AC]

Recordkeeping and Reporting Requirements

B.4. Silo Loading Records**.** The permittee shall keep logs for the facility to document compliance with the silo loading limitation of Specific Condition No. B.3. The logs shall at a minimum contain the following:

a. Facility Name, Emission Unit ID No. and Description;

b. Month, year, and method used for records;

c. The total quantity of the material (in tons) loaded into the eight (8) flour storage silos combined for the month; and

d. The total quantity of the material (in tons) loaded into the eight (8) flour storage silos combined for the most recent consecutive 12-month period.

[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.; Construction Permit No. 1050325-007-AC]