



Florida Department of Environmental Protection

Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

E-CORRESPONDENCE

desrosiers_leo@interstatebrands.com

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Renewal by:

Leo Desrosiers, Plant Manager
Interstate Brands Corporation
2200 South Division Avenue
Orlando, Florida 32805

FINAL Permit Project No.: 0950364-006-AV
Merita Bakery-Orlando Facility

Dear Mr. Desrosiers:

Enclosed is FINAL Permit, No. 0950364-006-AV. The purpose is for the renewal of the Title V Air Operation Permit. The facility is located in Orange County. This permit renewal is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

JNB/jar

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent by certified mail or electronically (with Received Receipt) before the close of business on August 29, 2007 to the person(s) listed or as otherwise noted:

Leo Desrosiers, Plant Manager, Interstate Brands Corporation, (**desrosiers_leo@interstatebrands.com**)

The undersigned duly designated deputy agency clerk hereby certifies that a copy of this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT was sent by certified mail or electronically (with Received Receipt) before the close of business on August 29, 2007 to the person(s) listed or as otherwise noted:

Hamp Pridgen, Air Section Manager, OCEPD, (**Hamp.Pridgen@ocfl.net**)

Scott Johnson, Field Env. Coordinator, Interstate Brands, (**johnson_scott@interstatebrands.com**)

Douglas W. Bauman, P.E., General Environmental Engineering, (**doug4ucf@earthlink.net**)

Barbara Friday, BAR [**Barbara.Friday@dep.state.fl.us**] (for posting with Region 4, U.S. EPA)

Clerk Stamp

Filed, on this date, pursuant to Section 120.52, F.S.,
with the designated Department Clerk, receipt is hereby
acknowledged.

W L Aguer
(Clerk)

8/29/07
(Date)

FINAL DETERMINATION

Title V Air Operation Permit Renewal
FINAL Permit No.: 0950364-006-AV
Interstate Brands Corporation
Merita Bakery-Orlando Facility
Page 1 of 1

I. Comment(s).

No comments were received from the USEPA during their 45-day review period of the PROPOSED Permit.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

Interstate Brands Corporation
Merita Bakery-Orlando Facility
Facility ID No.: 0950364
Orange County

Title V Air Operation Permit Renewal

FINAL Permit Project No.: 0950364-006-AV

Permitting and Compliance Authority
Orange County Environmental Protection Division
Air Program
800 Mercy Drive
Suite 4
Orlando, Florida 32808

Telephone: 407/836-1447
Fax: 407/836-1499

Title V Air Operation Permit Renewal

FINAL Permit No.: 0950364-005-AV

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Florida Department of Environmental Protection

Central District Office
3319 Maguire Boulevard, Suite 232
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Secretary

Permittee:

Interstate Brands Corporation
Merita Bakery-Orlando Facility
2200 South Division Avenue
Orlando, Florida 32805

FINAL Permit No.: 0950364-006-AV

Facility ID No.: 0950364

SIC Nos.: 20, 2051

Project: Title V Air Operation Permit Renewal

Attention: Leo Desrosiers, Plant Manager

This purpose of this permit is to renew the Title V Air Operation Permit. This existing facility is located at 2200 South Division Avenue, Orlando, Orange County, UTM Coordinates: Zone 17, 384.85 km East and 3227.24 km North; Latitude: 28° 31' 07" North and Longitude: 81° 23' 06" 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, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or 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 EMISSION UNITS and/or ACTIVITIES

APPENDIX TV-6, TITLE V CONDITIONS (version dated 6/23/06)

Effective Date:

August 27, 2007

Renewal Application Due Date:

February 28, 2012

Expiration Date:

August 30, 2012

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.

Program Administrator

Air Resources Management

JNB/jar

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of the following emission unit:

Bread Lines #1 and #2 and Roll Line #1 The permittee may operate Bread Line #1. The bread production consists of mixing, fermenting, mixing, dividing, proofing, baking fired by natural gas, cooling, and packaging. The permittee may operate Bread Line #2. The bread production consists of mixing, fermenting, mixing, dividing, proofing; baking fired by natural gas, cooling, and packaging. The permittee may operate Roll Line #1. The roll production consists of mixing, dividing, proofing; baking fired by natural gas, cooling, and packaging. Emission Unit #001, which includes all 3 production lines, operates without air pollution control equipment.

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

Based on the Title V Air Operation Permit Renewal Application received February 27, 2007, 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 Bread Line #1, Bread Line #2, and Roll Line #1

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, 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/ID Number Changes

These documents are on file with permitting authority:

Title V Air Operation Permit Revision issued August 10, 2006

Revision Title V Permit Application received November 15, 2005

Revision Title V Permit Application received October 17, 2003

Renewal Title V Permit Application received December 3, 2001

Subsection D. Miscellaneous.

The use of "Permitting Notes" throughout this permit are for information purposes only and are not permit conditions.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06), 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.
[Rule 62-296.320(2), F.A.C.]
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 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018
 - 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 Emission Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.4430(6) and 62-4.040(1)(b), F.A.C.]
6. When appropriate, any recordings, 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.]

7. The permittee shall submit all compliance-related notifications and reports required of this permit to the following office:

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

Telephone: 407/836-1447
Fax: 407/836-1499

8. 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

9. 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.]

Annual Statements

10. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year **on or before March 1** of the following year and submitted to Orange County Environmental Protection Division.

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

{Permitting Note: This condition implements the requirements of Rules 62-210.370(3) F.A.C. (see Condition 24. of APPENDIX TV-6, TITLE V CONDITIONS.)}

11. 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 Orange County Environmental Protection Division 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.)}

12. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to the Orange County Environmental Protection Division four copies of the air permit application, DEP Form No. 62-210.900(1).
[Rule 62-4.090, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.420(1)(a)3., 62-213.420(1)(b)1., 2., 3. & 4., 62-213.430(3), F.A.C. and 40 CFR 70.7(f) (see Conditions 35. and 38. of APPENDIX TV-6, TITLE V CONDITIONS.)}

13. The Merita Bakery-Orlando Facility is subject to 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.

[40 CFR Part 82, Subpart F – Recycling and Emissions Reduction]

{Permitting Note: Facility not subject to the requirement if an acceptable replacement for the refrigerant is used.}

Section III. Emissions Unit(s) and Conditions.

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

E.U. ID No./ Brief Description

001 - Bread Line #1, Bread Line #2 and Roll Line #1 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. The roll production for Roll Line #1 consists of mixing, dividing, proofing, baking fired by natural gas, cooling, and packaging.

Emission Unit #001, which includes all 3 production lines, operates without air pollution control equipment.

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

Essential Potential to Emit (PTE) Parameters

A1. Capacity. The maximum permitted utilization rates are: 65.28 million pounds of breads for Bread Line #1, 88.12 million pounds of breads for Bread Line #2, and 23.74 million pounds of rolls for Roll Line #1, per twelve consecutive months, updated monthly.

[Construction Permit 0950364-003-AC, and Rule 62-210.200, (Potential to Emit), F.A.C.]

A2. The maximum permitted utilization rate is 9.75 million cubic feet of natural gas for Bread Line #1, 18.75 million cubic feet of natural gas for Bread Line #2, and 8.75 million cubic feet of natural gas for Roll Line #1 per consecutive twelve months, updated monthly.

[Construction Permit 0950364-003-AC, and Rule 62-210.200, (Potential to Emit), F.A.C.]

A3. Hours of Operation. The emission unit is permitted to operate continuously per consecutive twelve months.

[Construction Permit 0950364-003-AC, and Rule 62-210.200, (Potential to Emit), F.A.C.]

Emission Limitations and Standards

A4. The emissions of volatile organic compounds/organic solvents (VOC/OS) as defined in Chapter 62-213, F.A.C., from the sources at the facility shall not be equal or exceed 249.0 tons per twelve consecutive months, updated monthly. The VOC emissions (pounds) from bread production shall be calculated by multiplying the amount of baked bread (tons) by the VOC Emission Factor (pounds VOC per ton of baked bread) generated from the following equation listed in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I under 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:

$$\text{VOC E.F.} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

Where:

VOC E.F. = pounds VOC per ton of baked bread
 Y_i = initial baker's percent of yeast
 T_i = total yeast action time in hours
 S = final (spike) baker's percent of yeast
 t_s = spiking time in hours

Where no final (spike) yeast is added, the equation condenses to:

$$\text{VOC E.F.} = 0.95 Y_i + 0.195t_i + 1.90$$

Merita may use the following nomenclature:

Y_i = initial baker's percent of yeast (Sponge % Yeast)
 T_i = total yeast action time in hours (Ferment + Proof + Floor Time)
 S = final (spike) baker's percent of yeast (Dough % Yeast)
 t_s = spiking time in hours (Proof + Floor Time)

The VOC emissions (pounds) from natural gas combustion shall be calculated by multiplying the amount of natural gas utilized/burned (million cubic feet) by the VOC emission factor (pound/million cubic feet) found in Table 1.4-2. Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion listed in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I. This VOC emission factor is 5.5 (pound/million cubic feet). The VOC emissions for bread production and natural gas combustion may be shown in units of tons after being converted from pounds.

[Construction Permit 0950364-003-AC, and Rule 62-210.200, (Potential to Emit), F.A.C.]

A5. The visible emission limitation for the other emission units is set forth in Rule 62-296.320(4)(b)1., F.A.C. (limited to less than 20% opacity). See facility-wide condition number 3.

Recordkeeping and Reporting Requirements

A6. In order to demonstrate compliance with condition **A1, A2, and A4**, the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the following:

Monthly

- a) month
- b) consecutive 12 month total of bread product (pounds) and natural gas utilized (cubic feet)

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

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.

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

A7. Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept which includes sufficient information to determine compliance. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least 5 years and made available to the Department. The monthly logs 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.]

STATEMENT OF BASIS

Interstate Brands Corporation
Merita Bakery-Orlando Facility
Facility ID No.: 0950364
Orange County

Title V Air Operation Permit Renewal
FINAL Permit Project No.: 0950364-006-AV

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 perform the work or 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.

The subject of this permit is for the renewal of Title V Air Operation Permit. This facility is a commercial bakery. CAM does not apply. This facility consists of the following emission unit:

001 - Bread Line #1, Bread Line #2, and Roll Line #1 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. The roll production for Roll Line #1 consists of mixing, dividing, proofing, baking fired by natural gas, cooling, and packaging. The baking occurs in ovens. The three production lines operate without air pollution control equipment. No NSPS and no MACT standard exist for the baking industry. The facility's potential to emit is less than 249.0 tons per year, thereby remaining a minor source for PSD purposes. The current VOC limit of 249.0 tons allows the facility sufficient operational flexibility. VOC emissions are produced from the actual baking process of the bread or rolls and from the natural gas combustion process. VOC emissions from the combustion process are negligible compared to VOC emissions from the baking process. The VOC emissions from the baking process are calculated by using an equation given in "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992). Bread Line #1 and Roll Line #1 initial start up date was January 1, 1962. Bread Line #2 initial start up date was January 1, 1984.

Facility Wide Emission Limit - 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.] Facility is subject to 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. Currently the facility uses an acceptable HCFC substitute within the bakery industrial process appliances; therefore, requirements are not applicable; however, records showing use of acceptable HCFC substitute should be maintained. Facility Wide Objectionable Odor Prohibited per Rule 62-296.320(2), F.A.C.

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

Based on the Title V Air Operation Permit application received February 27, 2007, this facility is not a major source of hazardous air pollutants (HAPs).