



Florida Department of Environmental Protection

Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
June 29, 2007

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

E-CORRESPONDENCE

desrosiers_leo@interstatebrands.com

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

Re: Title V Air Operation Permit Renewal
PROPOSED Permit Project No.: 0950364-006-AV
Merita Bakery-Orlando Facility

Dear Mr. Desrosiers:

One copy of the "PROPOSED Determination" for the renewal of a Title V Air Operation Permit for the Merita Bakery-Orlando Facility located at 2200 South Division Avenue, Orlando, Orange County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Alan Zahm, P.E. at 407/893-3335.

Sincerely,

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

JNB/jar

Enclosures

Copy furnished to:

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)

PROPOSED Determination

Title V Air Operation Permit Renewal
PROPOSED Permit Project No.: 0950364-006-AV
Page 1 of 1

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to Interstate Brands Corporation for the Merita Bakery-Orlando Facility located at 2200 South Division Avenue, Orlando, Orange County was clerked on May 14, 2007. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Orlando Sentinel on May 21, 2007. The DRAFT Permit was available for public inspection at the permitting authority's office in Orlando. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on June 4, 2007.

II. Public Comment(s).

No comments were received during the 30 (thirty) day public comment period. Since no comments were received, the DRAFT Permit becomes the PROPOSED Permit.

III. Conclusion.

Since there were no comments received during the Public Notice period, no changes were made to the DRAFT Permit and the permitting authority hereby issues the PROPOSED Permit, No. 0950364-006-AV.

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

Title V Air Operation Permit Renewal

PROPOSED Permit Project No.: 0950364-006-AV

Permitting Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Telephone: 407/893-3334
Fax: 407/897-5963

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

PROPOSED Permit No.: 0950364-005-AV

Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information	2
Subsection A. Facility Description.	
Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
Subsection C. Relevant Documents.	
Subsection D: Miscellaneous	
II. Facility-wide Conditions.....	3
Annual Statements.....	4
Permit Renewal.....	5
III. Emissions Unit(s) and Conditions	
Subsection A. 001 Bread Line #1, Bread Line #2, and Roll Line #1.....	6
Essential Potential to Emit (PTE) Parameters.....	6
Emission Limitations and Standards.....	7
Recordkeeping and Reporting Requirements.....	8
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers	
Appendix H-1, Permit History/ID Number Changes	
Appendix I-1, List of Insignificant Emission Units and/or Activities	
Appendix TV-6, Title V Conditions (6/23/06)	



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

Permittee:

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

PROPOSED 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:

TBD

Renewal Application Due Date:

February 28, 2012

Expiration Date:

August 30, 2012

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

JNB/jar

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

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.]

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Abbreviations and Acronyms:

°F:	Degrees Fahrenheit
BACT:	Best Available Control Technology
CFR:	Code of Federal Regulations
DEP:	State of Florida, Department of Environmental Protection
DARM:	Division of Air Resource Management
EPA:	United States Environmental Protection Agency
F.A.C.:	Florida Administrative Code
F.S.:	Florida Statute
ISO:	International Standards Organization
LAT:	Latitude
LONG:	Longitude
MMBtu:	million British thermal units
MW:	Megawatt
ORIS:	Office of Regulatory Information Systems
SOA:	Specific Operating Agreement
UTM:	Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix H-1, Permit History

Interstate Brands Corporation
Merita Bakery-Orlando Facility

PROPOSED Permit No.: 0950364-006-AV
Facility ID No.: 0950364

Permit History (for tracking purposes):

<u>E.U.</u> <u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Project Type</u>
-001	Bread Line #1, Bread Line #2, Roll Line #1	0950364-001-AV Change of Conditions	08/28/1997 05/01/2001	05/30/2001 05/30/2002	Initial
-001	Bread Line #1, Bread Line #2, Roll Line #1	0950364-002-AV	12/04/2002	08/30/2007	Renewal
-001	same as above	0950364-003-AV	04/07/2004	08/30/2007	Revision
-001	same as above	0950364-004-AC	01/22/2004	02/28/2005	Construction (replacement)
-001	same as above	0950364-005-AV	08/10/2006	02/28/2006 * 08/30/2007	Revision

* Extended expiration date one year

Appendix I-1: List of Insignificant Emissions Units and/or Activities.

Interstate Corporation
Merita Bakery-Orlando Facility

PROPOSED Permit No.: 0950364-006-AV
Facility ID No.: 0950364

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Space Heaters
2. Ink Jet Printers - Ink
3. Ink Jet Printers - Makeup
4. Equipment Chain Lubrication
5. Four Flour Silos with bin-vent filters (within building) and flour management system (within building)
6. Three natural gas fired boilers: two 2.5 MMBtu/hr and one 8.34 MMBtu/hr
7. Non-halogenated parts washers
8. Fire fighting equipment
9. Ground maintenance equipment and general purpose internal combustion engines
10. Welding, brazing, and soldering equipment and operations
11. Asbestos renovation and demolition activities
12. Steam cleaner
13. Gas combustion side (burners) of Bread Line Ovens #1 and #2, and gas combustion side (burners) of Roll Line #1 Oven
14. Refrigeration Equipment
15. Oil and fuel storage tanks
16. Fueling
17. Storage of waste chemicals and solvents
18. Air compressor system
19. HVAC systems
20. Maintenance shop activities
21. Painting (non-spray booth)
22. Applicable items on the EPA list of trivial and insignificant activities

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

Chapter 62-4, F.A.C.

1. **Not federally enforceable.** General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); and, Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable.** Procedures to Obtain Permits and Other Authorizations; Applications.

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require. (2) All applications and supporting documents shall be filed in quadruplicate with the Department. (3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except, when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them. (4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C. (5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section. (b) When an application is received without the required fee, the Department shall acknowledge receipt of the application and shall immediately notify the applicant by certified mail that the required fee was not received and advise the applicant of the correct fee. The Department shall take no further action until the correct fee is received. If a fee was received by the Department which is less than the amount required, the Department shall return the fee along with the written notification. (c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin. (d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application. (e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee. (6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review. (7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application for the same time duration except for modification under Chapter 62-45, F.A.C. [Rule 62-4.050, F.A.C.]

3. Standards for Issuing or Denying Permits. Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules. [Rule 62-4.070(7), F.A.C.]

4. Modification of Permit Conditions.

(1) For good cause and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee the Department may grant additional time. For the purpose of this section, good cause shall include, but not be limited to, any of the following: **(also, see Condition No. 38.)** (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship. (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S. (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards. (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance. (2) A permittee may request a modification of a permit by applying to the Department. (3) A permittee may request that

STATEMENT OF BASIS

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

Title V Air Operation Permit Renewal
PROPOSED 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).