Carlos A. Gimenez, Mayor

Department of Regulatory and Economic Resources
Environmental Resources Management
701 NW 1st Court, 2nd Floor
Miami, Florida 33136-3912
T 305-372-6925 F 305-372-6954

miamidade.gov

Inspection Report

Source: Flowers Baking Company of Miami, LLC

Location: 17800 NW Miami Court
Miami, Fl 33169

Facility Permit No.: 0250664-008-AV

Source Class: Title V
Standard Industrial Classification Code No. 2051.
The corresponding North American Industry Classification System (NAICS) code number is 311812 – Commercial Bakeries.

Permitting & Compliance Authority

Miami-Dade County
Department of Regulatory & Economic Resources (RER)
Division of Environmental Resources Management (DERM)
Air Quality Management
701 NW 1 Court, Suite 400
Miami, Florida 33136-3912

Current Inspection: June 18, 2013 Prior Inspection: June 26, 2012

Permit Issued: March 20, 2009 Permit Expires: March 19, 2014

Inspection Type: Full Compliance Evaluation (FCE)

Inspection Frequency: Annual

Inspected By: Marta March, Engineer 1, Air Facilities Section
Claire Jordahl, Engineer 2, Air Facilities Section

Attachments Full Compliance Evaluation Checklist (2 Pages)
Full Compliance Evaluation Review Form (9 Pages)

Persons Contacted During the Inspection:

Name	Title	Telephone
Alex Smith	Director of Operations	305-652-3416
Kenneth Redd	Director of Engineering	
Matthew Irwin	ESS Director	

Applicable Rules:

State Rule Citations – 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297

Local Rule – Chapter 24 – Code of Miami-Dade County

Facility Description:

The Flowers Baking Company of Miami, LLC is a commercial bakery that produces bread and bread-type bun products for human consumption. Bulk quantities of flour are shipped to the facility in tank trucks and the flour is conveyed into one of four (4) storage silos. Flour is weighed and mixed with sugar, yeast, water, and other miscellaneous ingredients. This facility uses three basic types of dough mixing processes: sponge dough, straight dough, and liquid brew. These processes vary in the manner in which the various dough ingredients are mixed, which in turn determines the amount of fermentation time available. Fermentation time can vary from five hours to 20 minutes, usually averaging 2 to 2.5 hours. The bread baking process at this facility is highly mechanized and consists of three high-speed production lines.

After mixing, the final dough is transferred to make-up equipment where it is kneaded, cut to proper size, and deposited into a pan. Before entering an oven, the dough is allowed to rise in a “proof box” which has a high temperature, high humidity environment supplied by steam from two, natural gas fired boilers. Oven emissions are generated by the combustion of natural gas and off-gasing from the bread itself.

The baking of bread usually requires 15 to 20 minutes. The bun process differs from the bread production only in the make-up equipment and shorter baking times. Once the bread product exits the oven, it is allowed to cool while it is transferred via conveyor to the slicing, packaging and package labeling area to be prepared for distribution.

Enforcement Actions: Based on facility records reviewed, the facility was subject to enforcement actions as follows:

> During the inspection of 10/15/2007, no records were available at the facility as required by Specific Condition No. A.5. of their Title V Air Operation Permit No. 0250664-006-AV. A Notice of Violation was sent on December 13, 2007. The facility was brought into compliance and a penalty of $3,000 was assessed.

The facility failed to submit their Statement of Compliance (SOC) and a Notice of Violation was issued May 2, 2008. The facility submitted their SOC on May 12, 2008. A penalty in the amount of $1,000 was assessed for this violation.

Compliance Tests: Tests are not required for this facility.

Approach to Site:

On Tuesday, June 18, 2013, Claire Jordahl, Engineer 2, Ian Campa, Summer Intern and I visited Flowers Baking Company of Miami, LLC. to conduct an annual compliance inspection of the Emission Units listed in the facility's Title V Air Operation Permit No. 0250664-008-AV and to review the facility records.

No visible emissions were observed coming out of stacks while driving around the facility.

On site, we met with Mr. Alex Smith, Director of Operations, Mr. Kenneth Redd, Director of Engineering, and Mr. Matthew Irwin, ESS Director. Mr. Irwin gave us a tour of the facility and answered most of our questions.

The facility has the following emissions units:

EU 002 – Bun Oven No. 1 Baker Perkins Model No. 970 utilizes liquid brew formulas

EU 003 - One (1) Stewart Systems, Inc., Model Type Conveyorized Bun Oven (Bun Oven No. 2) Bun Oven utilizes liquid brew formulas

- Max Heat Input: 5.75MMBtu/hr
- Max Process Rate: 9,157 lb/hr
- Max Baked Bun Production Rate: 8,241 lb/hr (36,097 tons per year)
- Direct fired, natural gas 48 MMcf/yr, two exhaust stacks 32' high 1.1' diameter

EU 007 - One (1) Baker Perkins, Model No. 970 Replacement Bread Oven utilizes straight and sponge dough formulas

- Max Heat Input Rating: 4.98 MMBtu/hr
- Max Input Capacity: 11,460 lb/hr
- Max Baked Bread Production Rate: 10,314 lb/hr
- Direct fired, natural gas 43.8 MMcuft/yr, two exhaust stacks 37' high 1.3' diameter

EU 004 - Two (2) Boilers, natural gas fired Cleaver Brooks Model No. CB200-150, each with the following specifications:

- Max Heat Input Rating: 6.27 MMBtu/hr
- Max Process Rate: 6,270 scf gas/hr
- Max Gas Usage 54.93 MMcf per year
- Exhaust stack, 35' high, 1.3'diameter

The following observations were made during the tour:

The bulk flour storage system includes the four storage silos, flour recycling and conveyance that are located outside the facility. Mr. Smith stated that the trucks come in 4 to 5 times a day to fill up the silos. The flour is pneumatically conveyed inside the facility for bread production. Integral to each silo is a bin vent filter to ensure effective pneumatic conveyance of the flour. Mr. Irwin stated that approximately 100,000 lbs of flour are delivered per day which equals to approximately 3 million lbs of flour per month.

Flour is weighed and mixed with sugar, yeast, water, and other miscellaneous ingredients in the dough mixing process, followed by fermentation and baking. Oven emissions are generated by the combustion of natural gas and the bread off-gasses of ethanol, carbon dioxide, and water. Once the bread product exits the oven, it is allowed to cool while being transferred via conveyor to the slicing, packaging and package labeling area in preparation for distribution. The process now uses non-hazardous ink to label bags with the packaging date.

Bun Oven (EU002) – Baker Perkins Model No. 970 utilizes liquid brew formulas – Mr. Irwin stated that the unit has been out of service since 2008. Bun Oven No 1 was disconnected.

Bun Oven (EU003) – Steward Systems, Inc, Model Type: Conveyorized, utilizes liquid brew formulas.

Bread Oven (EU007) – Baker Perkins Model Number 970 Utilizes Straight and Sponge Dough Formulas.

Emission units 003 and 007 were operating and were found to be in compliance.

Engineering Shop - Two (2) Boilers (EU004) - Natural Gas Fired, Cleaver Brooks Model No. CB200-150 and Parts Washer. The units were in operation at the time of the inspection and the make, model and specs of the units were verified.

Emission unit was found to be in compliance.

I observed empty drums labeled Trough Grease L, Vegalube, Cal Therm and Exa Lube outside the facility (non-hazardous). Mr. Irwin stated that Pioneer Reclycling Company picks up the empty drums.

Electronic Recordkeeping Reviewed at Mr. Irwin's Office:

Mr. Irwin showed the facility records in his computer. He had at least five years of records available in his computer. He sent one year record (from June 1, 2012 through May 31, 2013 to my e-mail address). Records included monthly bread production rates and 12-month rolling totals for the bread and bun ovens. A review of Mr. Irwin's computer data indicated that the

12-month rolling total bread production rates were 27,777.97 tons compared to the limit of 45,175 tons (combined sponge & straight dough bread); the 12-month rolling total bun production rates 12,589.56 tons compared to the limit of 36,096 tons liquid-brew dough.

Monthly and 12-month rolling totals for natural gas utilization rates for the bread and bun ovens and boilers

The 12-month rolling total natural gas rates for the ovens and the boilers are as follows:

- Bread oven - 14.36 mm cu ft (limit 43.8 mm cu ft)
- Bun oven - 12.92 mm cu ft (limit 48 mm cu ft)
- Boilers - 6.34 mm cu ft.

Total monthly and twelve (12) consecutive month VOC emissions for bread and bun ovens

The 12-month rolling VOC emissions for the bread oven was 35.35 tons (limit 121.9 tons)
The 12-month rolling VOC emissions for the combined bread and bun ovens were 60.86 tons (limit 216.31 tons).

Weekly log of meter readings for May 2013 for natural gas usage - Records were reviewed for a period of five years (Mr. Irwin's computer)

Mr. Irwin was asked to submit electronic copies of the following documents:

Monthly and 12-consecutive month rolling totals for each of the following:

- Bread oven production rate totals and by dough type (sponge & straight dough bread);
- Bun oven production rates;
- Natural gas utilization rate by user (boilers, bread oven & bun oven);
- VOC emissions rate totals and by production line (bread & bun);
- Weekly logs of meter readings for May 2013 with natural gas usage.
- Sample emissions calculations for 2012 (similar to what was submitted in 2011 for AOR)
- Emissions report for June 2012 thru May 2013.
- Material safety data sheets for "Trough Grease" and the Safety Kleen parts washer cleaning agent.
- Copy of hazardous waste disposal manifests for the parts washer solvent.

The requested electronic documents were received via email on June 19, 2013. The records were reviewed in the office.

Semiannual reports from January 1 to June 30 and July 1 to December 31, 2012 were submitted to the DERM on July 5, 2012 and January 15, 2013, respectively. The 2012 Statement of Compliance (SOC) was submitted on February 13, 2013. The Annual Operating Report (AOR) for the year 2012 was submitted on March 1, 2013. The operating hours and annual emissions reflected in the 2012 AOR were: EU003 (6898 hours), EU004 (8760 hours) and EU007 (7510 hours), annual emissions for EU003 (VOC=27.57 tons), EU007 (VOC = 34.86 tons).

Mr. Irwin stated that Greenway Environmental, LLC. was hired by Flowers Baking Company of Miami, LLC. to prepare and submit the renewal application for Title V Operation Permit, which is due by August 6, 2013. The current Title V Operation Permit expires on March 19, 2014.

Conclusions:

Based on the observations during the inspection of June 18, 2013, and review of records received during the on-site inspection and other reports submitted by the facility, it appears that Flowers Baking is operating in compliance with the permit conditions of their Title V operation permit.

Date of Report: June 20, 2013

FULL COMPLIANCE EVALUATION CHECKLIST

AIRS ID 0250664	OWNER/PERMITTEE Mr. John DeLeu	FACILITY NAME Flowers Baking Company of Miami, LLC
☒ TITLE V	☐ SYNTHETIC MINOR	DATE OF THIS FCE 6/26/13
☐ TITLE V MEGA-SITE*	☐ OTHER	DATE OF LAST FCE 8/25/11

*Facility with a large number of complex emissions units. It is more reasonable to evaluate a Title V Mega-Site once every 3 years instead of once every 2 years.

REVIEW OF ALL REQUIRED REPORTS

PERIODIC REPORTS			COMMENTS
☒ DONE	☐ N/A	Annual operating report	For 1/1/12 – 12/31/12; received 3/1/13
☒ DONE	☐ N/A	Statement of compliance	For 1/1/12 – 12/31/12; received 2/13/13
☐ DONE	☒ N/A	Annual	
☒ DONE	☐ N/A	Semi-annual	For 1/1/12 – 6/30/12; received 7/5/12 For 7/1/12 – 12/31/12; received 1/15/13
☐ DONE	☒ N/A	Quarterly	
☐ DONE	☒ N/A	Other :	
☐ DONE	☒ N/A	Other :	

CONTINUOUS EMISSION MONITOR REPORTS			COMMENTS
☐ DONE	☒ N/A	Quarterly excess emissions	
☐ DONE	☒ N/A	Semi-annual	
☐ DONE	☒ N/A	RATA	
☐ DONE	☒ N/A	CGA	
☐ DONE	☒ N/A	Other :	
☐ DONE	☒ N/A	Other :	

ASSESSMENT OF CONTROL DEVICE AND PROCESS OPERATING CONDITIONS

☐ OFF-SITE ASSESSMENT	(Describe the off-site assessment in comments)
☒ ON-SITE ASSESSMENT	(Document the on-site inspection below)

DATE OF INSPECTION	DATE OF INSPECTION REPORT	My office maintains the inspection report...		
		...in the ARMS database through EASIIR.	...with the paper or electronic compliance files	...in another location (specify).
6/18/13	6/18/13	☒ ARMS	☒	☒PEN & EDMS
		☐	☐	☐
		☐	☐	☐
		☐	☐	☐

COMMENTS: PEN is Miami-Dade County's Permitting and Enforcement System Database.
Our office maintains all facility records (including inspection reports) in an Electronic Data Management System (EDMS). The records are available online for the public.

FULL COMPLIANCE EVALUATION CHECKLIST

REVIEW OF TESTS AND RECORDS

TESTS, OBSERVATIONS AND RECORDS		COMMENTS
☒ DONE ☐ N/A	Visible emission observation(s)	6/18/13 – In compliance.
☒ DONE ☐ N/A	Review of facility records and logs	Reviewed records for the period June 1, 2012 through May 31, 2013 – In compliance.
☒ DONE ☐ N/A	Assessment of process parameters (feed rates, process rates, raw material compositions, etc.)	Reviewed on 6/18/13 – In compliance.
☐ DONE ☒ N/A	Assessment of control equipment performance parameters (water flow rates, pressure drops, temperatures, ESP power levels, etc.)	No control equipment
☐ DONE ☒ N/A	Stack test(s)	
☐ DONE ☐ N/A	Other :	
☐ DONE ☐ N/A	Other :	

COMPLIANCE MONITORING (CM) INFORMATION

CM ELEMENT	My office maintains this information...			
	...electronically, in the ARMS database.	...in the permit.	...in the inspection report.	...in another location (specify).
Facility information	☒	☒	☒	☒Facility file
Applicable requirements	☒	☒	☐	☒Facility file
Inventory of emission units	☐	☐	☒	☒Facility file
Enforcement history	☒	☐	☐	☒Facility file
Compliance activities	☒	☐	☐	☒Facility file
Findings and recommendations	☐	☐	☐	☒Facility file
COMMENTS				

OTHER COMMENTS

Facility records were reviewed for the period June 1, 2012 through May 31, 2013. Records included: Bread production rates, natural gas utilization rates, hours of operation and VOC emissions.

Prepared by: Marta March Date: 6/26/13

Reviewed by: Ray Gordon Date: 6/26/13

Full Compliance Evaluation Review Form
Flowers Baking Company of Miami, LLC

Flowers Baking Company of Miami, LLC **17800 NW Miami Court** **Miami, Fl 33169** **Facility ID No.: 0250664** **Title V Air Operation Permit** **Permit No. 0250664-008 –AV** **Effective Date: March 20, 2009** **Renewal Application Due Date: August 6, 2013** **Expiration Date: March 19, 2014** **TITLE V PERMIT CONDITIONS**	**Info Obtained in Office &/or Field**	**<u>COMPLIANCE STATUS*</u>**	**VERIFICATION COMMENTS** (*****Compliance Status Notation: Yes = In Compliance; No = Out of Compliance; NA = Requirement not applicable; SC = Statement Condition)
SECTION II. FACILITY-WIDE CONDITIONS.			
The following conditions apply facility-wide: **1.** APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit. {Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}	O	SC	
2. <u>General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.</u> 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. and 0250664-007-AC]	F	Y	No objectionable odors were noted during the inspection on June 18, 2013.
3. <u>General Particulate Emission Limiting Standards. General Visible Emissions Standard.</u> 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.]	F	Y	No visible emissions were observed from the facility on June 18, 2013.

FCE REVIEW FORM DATED 6/26/2013	**OFFICE/ FIELD**	**IN COMPLI-ANCE**	**VERIFICATION COMMENTS** *SC = Statement Condition
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]	O	SC	
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.]	O/F	Y	Insignificant units verified during the inspection on June 18, 2013: Ingredient storage tanks Comfort heaters Parts washer Bulk flour system Four (4) flour reclaim system Two (2) air dryers Label printing operations and Four (4) flour silos Miscellaneous maintenance and housekeeping activities
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. Tightly cover or close all VOC containers when they are not in use;	F	N/A	The facility does not store VOCs.

FCE REVIEW FORM DATED 6/26/2013	**OFFICE/ FIELD**	**IN COMPLI-ANCE**	**VERIFICATION COMMENTS** *SC = Statement Condition
b. Tightly cover all open tanks, which contain VOCs when they are not in use; c. Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition; d. Confine rags used with VOCs to tightly closed, fireproof containers when not in use; and, e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal. [Rule 62-296.320(1)(a), F.A.C.]			
7. <u>Emissions of Unconfined Particulate Matter</u>. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS): a. Maintain silo bin vent filters in good working order. [Rule 62-296.320(4)(c)2., F.A.C.; and, 0250664-007-AC]	F	Y	According to Mr. Smith, Director of Operations for Flowers Baking, silo bin vent filters are changed regularly.
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.]	O	SC	
9. <u>Statement of Compliance</u>. 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.]	O	Y	2012 Statement of Compliance was submitted to DERM on February 13, 2013.
10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Dade County Office: Miami-Dade County Department Of Environmental Resources Management (DERM) Air Quality Management Division 701 NW 1 Court Suite 800 Miami, Florida 33136	O	SC	Name of the Department has changed to Department of Regulatory & Economic Resources. The office has moved to Suite 200 from Suite 800. Recent correspondence to the facility reflects these changes.
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	O	SC	

FCE REVIEW FORM DATED 6/26/2013	**OFFICE/ FIELD**	**IN COMPLI-ANCE**	**VERIFICATION COMMENTS** *SC = Statement Condition
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.]	O	Y	Responsible official on file is John De Leu, President for Flowers Baking Company. Application forms, reports, compliance statements, compliance plans and compliance schedules submitted for the period from June 1, 2012 and May 31, 2013 from Flowers Baking have been signed and certified by the responsible official on file.
Section III. Emissions Unit(s) and Conditions. **Subsection A. This section addresses the following emissions unit(s).** **E.U. ID No.** — **Brief Description** 002 — **Bun Oven No. 1 (installed 1/1965) Baker Perkins Model No. 970 utilizes liquid brew formulas** • Max Heat Input Rating 2.28 MMBtu/hr • Max Process Rate 4,658 lb/hr • Max Baked Bun Production Rate 4,192 lb/hr (18,362 tons per year) • Direct fired, natural gas 20 MMcuft/yr, two exhaust stacks 36’ high 1.5’ diameter 003 — **Bun Oven No. 2 (installed 11/1996) Stewart Systems, Inc Model Type: Conveyorized, utilizes liquid brew formulas** • Max Heat Input: 5.75MMBtu/hr • Max Process Rate: 9,157 lb/hr	F	Y	The emission units listed in this condition (EU 003 and EU 007) were operational at the time of the inspection on June 18, 2013 and the make, model and specifications were verified. Bun Oven (EU 002) was not operational and Mr. Irwin stated that the unit has been out of service since 2008.

FCE REVIEW FORM DATED 6/26/2013	OFFICE/ FIELD	IN COMPLI-ANCE	VERIFICATION COMMENTS *SC = Statement Condition
• Max Baked Bun Production Rate: 8,241 lb/hr (36,097 tons per year) • Direct fired, natural gas 48 MMcf/yr, two exhaust stacks 32’ high 1.1’ diameter 007 **Replacement Bread Oven (installed 3/98) Baker Perkins Model Number 970 utilizes straight and sponge dough formulas** • Max Heat Input Rating: 4.98 MMBtu/hr • Max Input Capacity: 11,460 lb/hr • Max Baked Bread Production Rate: 10,314 lb/hr • Direct fired, natural gas 43.8 MMcuft/yr, two exhaust stacks 37’ high 1.3’ diameter			
The following specific conditions apply to the emissions unit(s) listed above: **<u>Essential Potential to Emit (PTE) Parameters</u>** **A.1.** **<u>Permitted Capacity</u>** The maximum bread production rates, in any twelve consecutive month period, shall not exceed: • Bread Oven (EU-007) –- 45,175 tons combined sponge & straight dough bread (within a 10,000 ton limit on straight dough bread) • Bun Oven #1 (EU-002) - 18,361.8 tons liquid-brew dough • Bun Oven #2 (EU-003) – 36,096 tons liquid-brew dough [Rule 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0250664-007-AC]	O	Y	Monthly and 12-month rolling production rates for various types of bread were reviewed for the period from June 1, 2012 to May 31, 2013. <u>Bread Oven (EU 007)</u> – Sponge and straight dough - 27,777.97 tons (limit is 45,175 tons) Straight dough – 0 (limit is 10,000 tons) <u>Bun Oven #2 (EU 003)</u> - 12,589.56 tons (limit is 36,096 tons) Bun Oven #1 (EU 002) – not operating The production rates were within limits.
A.2. **<u>Methods of Operation</u>** The natural gas utilization rate, in any twelve consecutive month period, shall not exceed: • Bread Oven (EU-007) – 43.8 MM cu ft/yr (4.98 MM Btu/hr) • Bun Oven #1 (EU-002) - 20 MM cu ft/yr (2.2 MM Btu/hr), • Bun Oven #2 (EU-003) – 48 MM cu ft/yr (5.75 MM Btu/hr) [Rule 62-213.410 F.A.C.; and, 0250664-007-AC]	O	Y	Monthly and 12-month rolling totals for natural gas utilization rates were reviewed for the period from June 1, 2012 to May 31, 2013. Bread Oven (EU-007) - 14.36 MM cu ft Bun Oven #2 (EU-003) - 12.92 MM cu ft Boiler natural gas rate is 6.34 MM cu ft. The rates were within the limits.

A.3. **Hours of Operation**. These emissions units are allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.; and, 0250664-007-AC]	O	Y	Annual Operating Report (AOR) for the year 2012 was submitted on March 1, 2013. Operating hours reflected in the 2012 AOR were: EU003 (6898 hrs), and EU007 (7510 hrs).
Emission Limitations and Standards **A.4.** **Volatile Organic Compounds (VOC)**: The VOC emissions rate for the bread oven (EU -007) shall not exceed 121.9 tons in any twelve (12) consecutive month period, and, the combined total VOC emissions rate for all three ovens (EU Nos. -007, -002 and -003), shall not exceed 216.31 tons in any twelve (12) consecutive months, updated monthly. [Rule 62-296.320(1)(a) F.A.C.; and, 0250664-007-AC]	O	Y	Monthly and twelve (12) consecutive month VOC emissions were reviewed for the period from June 1, 2012 to May 31, 2013 for bread and bun ovens The 12-month rolling VOC emissions for bread oven (EU 007) were 35.35 tons (limit 121.9 tons), The 12-month rolling VOC emissions for combined bread and bun ovens (EU Nos. 003 and 007) were 60.86 tons (limit 216.31 tons).
Record keeping and Reporting Requirements **A.5.** In order to demonstrate compliance with conditions A.1 thru A.4 above, the permittee shall maintain a rolling, consecutive 12-month 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: a) Tons of straight dough, sponge dough and liquid brew bread and buns produced b) VOC emissions c) Natural gas usage d) Operating hours [Rule 62-4.070(3) F.A.C.; and, 0250664-007-AC]	F/O	Y	Mr. Matthew Irwin, ESS Director for Flowers Baking Company provided electronic recordkeeping for the period from June 1, 2012 to May 31, 2013 and the records were filed electronically. For the purpose of this FCE, records for the period from June 1, 2012 to May 31, 2013 were reviewed. Records provided by the facility included rolling, consecutive 12-month logs of tons of straight dough, sponge dough and liquid brew bread and buns produced, VOC emissions, natural gas usage, and operating hours.

<table>
<thead>
<tr><th>FCE REVIEW FORM DATED 6/26/2013</th><th>OFFICE/ FIELD</th><th>IN COMPLI-ANCE</th><th>VERIFICATION COMMENTS
*SC = Statement Condition</th></tr>
</thead>
<tbody>
<tr><td>Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit(s).
<table>
<tr><th>E.U. ID No.</th><th>Brief Description</th></tr>
<tr><td>004</td><td>Two (2) Boilers, natural gas fired (installed 1/1/1980)
Cleaver Brooks Model No. CB200-150, each with the following specifications:
• Max Heat Input Rating: 6.27 MMBtu/hr
• Max Process Rate: 6,270 scf gas/hr
• Max Gas Usage 54.93 MMcf per year
• Exhaust stack, 35’ high, 1.3’diameter</td></tr>
</table></td><td>F</td><td>Y</td><td>Emission Unit 004 – Two (2) Boilers were verified at the time of the inspection on June 18, 2013.
Emissions from the boiler were reported in the 2012 AOR received on March 1, 2013.</td></tr>
<tr><td><u>ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS</u>

B.1. <u>Fuel Restrictions</u>: Fuel use for emissions unit 004 shall be limited to natural gas only.
[Rule 62-4.070(3) F.A.C.]</td><td>F/O</td><td>Y</td><td>According to Mr. Irwin and records submitted, EU 004, two (2) boilers only use natural gas.</td></tr>
<tr><td>B.2. <u>Hours of Operation:</u> These emissions units are allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.]</td><td>O</td><td>Y</td><td>EU 004 – Two (2) boilers were reported to operate a total of 8760 hours in 2012 based on the Annual Operating Report received on March 1, 2013.</td></tr>
<tr><td>Emission Limitations and Standards

B.3. <u>Visible Emissions</u>: 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% opacity).
[Rule 62-296.320(4)(b) F.A.C.]</td><td>F</td><td>Y</td><td>No visible emissions were observed from the stacks during the inspection of June 18, 2013.</td></tr>
</tbody>
</table>

<table>
<tr>
<td>**Section III. Emissions Unit(s) and Conditions.**
Subsection C. Common Conditions. This section addresses the following emissions unit(s).
<table>
<tr><th>E.U. ID No.</th><th>Brief Description</th></tr>
<tr><td>002</td><td>Bun Oven No. 1 Baker Perkins Model No. 970</td></tr>
<tr><td>003</td><td>Bun Oven No. 2 Stewart Systems, Inc Model Type: Conveyorized</td></tr>
<tr><td>004</td><td>Boilers No. 1 & No. 2, natural gas fired, Cleaver Brooks Model No. CB200-150</td></tr>
<tr><td>007</td><td>Bread Oven Replacement Baker Perkins Model Number 970</td></tr>
</table>
</td>
<td>F</td>
<td>Y</td>
<td>Emission Units 003, 004 and 007 were operational at the time of the inspection. Emission Unit 002 has not been in operation since 2008.</td>
</tr>
<tr>
<td>**The following conditions apply to the emissions unit(s) listed above:**
C.1. Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceeds two hours in any 24 hour period unless specifically authorized by the DERM for longer duration.
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 F.A.C.]</td>
<td>F</td>
<td>N/A</td>
<td>No excess emissions have been reported in the Semiannual Reports submitted for the period January 1, 2012 to December 31, 2012.
No excess emissions were observed during the inspection.</td>
</tr>
<tr>
<td>**C.2.** Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C.]</td>
<td>F</td>
<td>N/A</td>
<td>There is no pollution control device in place at this facility.</td>
</tr>
<tr>
<td>**C.3.** Report Excess Emissions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the DERM 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 the DERM.
[Rule 62-210.700(6) F.A.C.]</td>
<td>O</td>
<td>N/A</td>
<td>No excess emissions have been reported.</td>
</tr>
</table>

<table>
<tr><td>C.4.</td><td><u>Compliance Test Reports</u>: Compliance test reports (when required) shall be submitted to the DERM, Air Facilities Section, as soon as practical, but no later than 45 days after the last sampling run of each test is completed. Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the DERM to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the information necessary to make a complete report pursuant to F.A.C. Rule 297.310(8)(c).
[Rule 62-297.310(8)(a), (b), & (c) F.A.C.]</td><td>O</td><td>N/A</td><td>Compliance tests are not required for this facility; therefore, compliance test reports are not necessary.</td></tr>
<tr><td>C.5.</td><td><u>Annual Report Required</u>: On or before April 1 of each calendar year, a completed DEP Form 62-210.900(5), Annual Operating Report (AOR) Form for Air Pollutant Emitting Facility, shall be submitted to the Miami-Dade County, DERM, Air Quality Management Division, except that the AOR for year 2008 shall be submitted by May 1, 2009. Included with this report shall be any additional reports, if any, required by this permit in Part III -- Emission Unit Specific Conditions.
[Rule 62-210.370(3) F.A.C.]</td><td>O</td><td>Y</td><td>2012 Annual Operating Report was received at DERM on March 1, 2013.</td></tr>
<tr><td>C.6.</td><td><u>Semiannual Monitoring Reports</u>: The permittee shall submit to the DERM Air Facilities Section, a report of all required monitoring every 6 months. All instances of deviations from permit requirements must be clearly identified in such reports. The responsible official shall certify each report to be true, accurate, and complete based on the information submitted and belief formed after the reasonable inquiry. The reports shall be completed and submitted to the DERM on or before the deadline specified below:

Table A.1. Dates for Semiannual Monitoring Reports
<table>
<tr><th>Reporting Period</th><th>Report Deadline</th></tr>
<tr><td>July through December</td><td>January 31st</td></tr>
<tr><td>January through June</td><td>July 31st</td></tr>
</table>
[Rule 62-213.440(1)(b)3a F.A.C.]</td><td>O</td><td>Y</td><td>Semiannual report for the period January 1, 2012 through June 30, 2012 was received on July 5, 2012.
The report for the period July 1, 2012 through December 31, 2012 was received on January 15, 2013.</td></tr>
</table>

FCE Checklist Prepared by Marta March, Engineer 1, Air Facilities Section

FCE Checklist Reviewed by Ray Gordon, Special Projects Administrator 1, Air Facilities Section