

**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 Obtain ed in Office &/or Field	<u>COMPLI- ANCE 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.

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4. <u>Prevention of Accidental Releases (Section 112(r) of CAA).</u> 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. <u>Insignificant Emissions Units and/or Activities.</u> 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. <u>General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.</u> 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.

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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	

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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).		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.
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			

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007	- 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 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.

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A.3. <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.; 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).
<u>Emission Limitations and Standards</u> A.4. <u>Volatile Organic Compounds (VOC):</u> 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).
<u>Record keeping and Reporting Requirements</u> 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.

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Section III. Emissions Unit(s) and Conditions.		F	Y	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.
Subsection B. This section addresses the following emissions unit(s).				
E.U. ID No.	Brief Description			
004	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			
<u>ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS</u>		F/O	Y	According to Mr. Irwin and records submitted, EU 004, two (2) boilers only use natural gas.
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.]			
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.]	O	Y	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.
Emission Limitations and Standards		F	Y	No visible emissions were observed from the stacks during the inspection of June 18, 2013.
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.]			

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Section III. Emissions Unit(s) and Conditions. Subsection C. Common Conditions. This section addresses the following emissions unit(s).				
E.U. ID No.	Brief Description			
002	Bun Oven No. 1 Baker Perkins Model No. 970	F	Y	Emission Units 003, 004 and 007 were operational at the time of the inspection. Emission Unit 002 has not been in operation since 2008.
003	Bun Oven No. 2 Stewart Systems, Inc Model Type: Conveyorized			
004	Boilers No. 1 & No. 2, natural gas fired, Cleaver Brooks Model No. CB200-150			
007	Bread Oven Replacement Baker Perkins Model Number 970			
The following conditions apply to the emissions unit(s) listed above: C.1. <u>Excess Emissions:</u> 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.]		F	N/A	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.
C.2. <u>Circumvention:</u> 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.]		F	N/A	There is no pollution control device in place at this facility.
C.3. <u>Report Excess Emissions:</u> 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.]		O	N/A	No excess emissions have been reported.

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C.4.	<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.]	O	N/A	Compliance tests are not required for this facility; therefore, compliance test reports are not necessary.								
C.5.	<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.]	O	Y	2012 Annual Operating Report was received at DERM on March 1, 2013.								
C.6.	<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><tr><td colspan="2">Table A.1. Dates for Semiannual Monitoring Reports</td></tr><tr><td>Reporting Period</td><td>Report Deadline</td></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.]	Table A.1. Dates for Semiannual Monitoring Reports		Reporting Period	Report Deadline	July through December	January 31 st	January through June	July 31 st	O	Y	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.
Table A.1. Dates for Semiannual Monitoring Reports												
Reporting Period	Report Deadline											
July through December	January 31 st											
January through June	July 31 st											

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

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