

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2007**

Region: Asheville Regional Office
County: Burke
NC Facility ID: 1200141
Inspector's Name:
Date of Last Inspection:
Compliance Code:

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Earthgrains Baking Companies, Inc.</p> <p>Facility Address: Earthgrains Baking Companies, Inc. 320 East Main Street Valdese, NC 28690</p> <p>SIC: 2051 / Bread Cake And Related Product NAICS: 311812 / Commercial Bakeries</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 1200141.07A Date Received: 08/06/2007 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 09315/T01 Existing Permit Issue Date: 07/15/2005 Existing Permit Expiration Date: 05/31/2008</p>
Richard Voiers Environmental Coordinator (828) 874-2136 320 East Main Street Valdese NC, 28690	Andy Lopez Plant Manager (828) 874-2136 320 East Main Street Valdese NC, 28690	Richard Voiers Environmental Coordinator (828) 874-2136 320 East Main Street Valdese NC, 28690	
Review Engineer: Mark Cuilla		Comments / Recommendations:	
Review Engineer's Signature: Date: date, 2007		<p>Issue 09315/T02 Permit Issue Date: date, 2007 Permit Expiration Date: date, 2012</p>	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**09315T01**) was issued on **July 15, 2005**, and is currently scheduled to expire on **May 31, 2008**. The renewal application was received on **August 6, 2007**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is a commercial bakery with four permitted direct-fired natural gas baking ovens for various products. Additionally, the facility operates flour storage silos with internally venting bagfilters and other miscellaneous insignificant activities.

III. History/Background/Application Chronology

June 19, 2003 – Permit **09315T00** issued as a first time Title V permit.

July 25, 2005 – Permit **09315T01** issued as a 502(b)(10) modification for the replacement of one natural gas-fired variety bread oven (**ID No. ES-2**).

August 6, 2007 – Permit application **1200141.07A** was received as a permit renewal request. The application was deemed complete for processing.

August 30, 2007 – DRAFT permit sent to Permittee, Regional Office, Title V Coordinator for comment prior to public notice and EPA review.

Date, 2007 – DRAFT sent to 30-day public notice and 45-day EPA review prior to issuance.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Cover	-	-updated all dates and permit revision numbers
TOC	-	-removed reference to Part II
All	Header	-updated permit revision number
4	2.1 A (table) 2.1 A.1.a 2.1 A.1.b 2.1 A.1.d	-added permit limit clarification ID Nos. -added ID Nos. -added ID Nos. -added ID Nos.
5-14	General Conditions	-updated General Conditions (v2.19)
-	Part II	-removed Part II

It should be noted that each permitted piece of equipment and insignificant activity was modified in ESM to the current business rules/naming conventions.

Current Permit	Renewed Permit
NA	Four day-use flour bins each with an internally vented “sock-type” filter (ID Nos. IS-7.1 through IS-7.4)
NA	Three sifters each with an internally vented “sock-type” filter (ID Nos. IS-8.1 through IS-8.3)

V. Regulatory Review

The facility is currently subject to the following regulation:

15A NCAC 2D .0521, Control of Visible Emissions

A regulatory review for the existing sources will not be included in this document.

It should be noted that the facility is Title V because it has the potential to emit greater than 100 tons per year of VOCs. However, because there are no applicable VOC regulations for this facility, the facility was issued a “hollow” permit. The only Title V requirement is the submittal of an annual compliance certification.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is classified as a Title III minor facility; therefore, it is not subject to any MACT standards. This permit renewal does not affect this status.

PSD – The facility is not currently subject to any Prevention of Significant Deterioration regulations. This permit renewal does not affect this status.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no control devices at the facility; therefore, CAM does not apply.

VII. Facility Wide Air Toxics

The facility is not currently subject to North Carolina Air Toxics regulations. This permit renewal does not affect this status.

VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)
CO	3.39
NO _x	4.03
PM ₁₀	3.97
SO ₂	0.03
VOC	155.35
Total HAP/TAP	1.16

IX. Stipulation Review

No stipulation modifications have been identified by the regional office. Patrick Ballard of the ARO notes in his June 28, 2006 inspection report that the facility appeared to be operating in compliance with the current air permit.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina and Tennessee are affected States and the Western NC Regional Air Quality Agency and Mecklenburg County are affected Local Programs all within 50 miles of the facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

ARO recommends issuance of the permit and **was presented** with a DRAFT permit prior to notice and issuance.

RCO concurs with ARO's recommendation to issue the renewed air permit.