

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: date, 2008

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100996
Inspector's Name: Eric Hudson
Date of Last Inspection: 09/18/2007
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Flowers Baking Company of Jamestown, LLC Facility Address: Flowers Baking Company of Jamestown, LLC 801 West Main Street GSO Road Jamestown, NC 27282 SIC: 2051 / Bread Cake And Related Product NAICS: 311812 / Commercial Bakeries Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4100996.08A Date Received: 07/28/2008 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08250/T04 Existing Permit Issue Date: 05/28/2004 Existing Permit Expiration Date: 04/30/2009
Rodericke Pass Director of Environmental, Safety, Secur (336) 841-8840 P.O. Box 819 Jamestown NC, 27282+0819	Roger Tooley President (336) 841-8840 P.O. Box 819 Jamestown NC, 27282	Matt Doris Chief Engineer (336) 841-8840 P O Box 819 Jamestown NC, 27282+0819	
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2008		Comments / Recommendations: Issue 08250/T05 Permit Issue Date: date, 2008 Permit Expiration Date: date, 2013	

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 (**08250T04**) was issued on **May 28, 2004**, and is currently scheduled to expire on **April 30, 2009**. The renewal application was received on **July 28, 2008**, 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 three permitted direct-fired natural gas baking ovens for various products. Additionally, the facility operates flour storage silos with associated bagfilters and other miscellaneous insignificant activities.

III. History/Background/Application Chronology

July 28, 2008 – Permit application **4100996.08A** was received for the renewal of the existing Title V air permit.

September 3, 2008 – DRAFT permit sent to Permittee, Regional Office, Title V Coordinator for comment prior to public notice and EPA review. WSRO replied **September 26, 2008** via email with no additional comments. The Permittee replied **September 29, 2008** via email with no additional comments.

Date, 2008 – 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	Section	Description
Attachment	Insignificant Activities	-updated permit revision number
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed reference to Part II -added reference to Section 2.2 Permit Shield for Nonapplicable Requirements
All	Header	-amended permit revision number
3	Equipment Table	-amended equipment descriptions where needed
4	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.1.d 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c	-added ID numbers -corrected testing condition cross reference -updated shell language -added “no reporting” language -added ID numbers -corrected testing condition cross reference -added ID numbers
5	2.1 A.3.c 2.1 B 2.1 B.1.a	-corrected testing condition cross reference -amended equipment description (equipment/control device orientation) -added ID numbers
6	2.1 B.1.b 2.1 B.1.c 2.1 B.1.e 2.1 B.2.a 2.1 B.2.b	-corrected testing condition cross reference -added ID numbers -added ID numbers -added ID numbers -corrected testing condition cross reference
7	2.1 B.2.c 2.2 A	-added ID numbers and amended shell language -added “Permit Shield for Nonapplicable Requirements” (for CAM)
8-17	General Conditions	-updated shell conditions (v2.22.1)

The following table represents the modifications/additions/deletions to ESM:

Current Description	Modified Description
Four video jet printers (ID No. IA-VJP)	Associated to permit
Three squid ink printers (ID No. IA-SIP)	End dated per WSRO inspection report
NA	Seven wax printers (ID No. IA-WP)
NA	Depanner (Total of 3 units; ID No. IA-DP)
NA	Flour Reclaim System (ID No. IA-FRS)
NA	Bulk Flour System (ID No. IA-BFS)

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
 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, there are no applicable VOC regulations for this facility.

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. In his, **May 28, 2004** renewal application review (**4100996.02A**), Jeff Twisdale noted that CAM does not apply because each flour silo is not considered to be a major pollutant specific emission unit. By using the uncontrolled emission factor of 0.46 pounds PM₁₀ per ton cement in AP-42 Chapter 11.12 to estimate the uncontrolled particulate matter emissions and considering that cement and flour have similar properties, each flour silo has an uncontrolled emission rate of 15.4 pounds per hour (~67.5 tons per year).

In order to clarify this position in the permit, the following “Non-applicable requirements” language has been included in the renewed permit as Section 2.2 A:

2.2- Permit Shield for Nonapplicable Requirements

A. *One flour storage silo (ID No. ES-SL3) with associated bagfilters (ID Nos. CD-SL3FFS1 and CD-SL3FFS2)*

One flour storage silo (ID No. ES-SL4) with associated bagfilters (ID Nos. CD-SL4FFS1 and CD-SL4FFS2)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
-	Compliance Assurance Monitoring	15A NCAC 2D .0614

1. **15A NCAC 2D .0614: COMPLIANCE ASSURANCE MONITORING** - Pursuant to 15A NCAC 2Q .0512(a)(1)(B) “Permit Shield and Application Shield, with the issuance of this permit (08250T05), the following stipulation of nonapplicability has been made:
 - a. 15A NCAC 2D .0614 does not apply to permitted sources (ID Nos. ES-SL3 and ES-SL4) because each source’s potential uncontrolled emissions do not exceed the major source thresholds for that pollutant. See 40 CFR 64.2(a)(3).
Therefore, CAM has been determined to not be applicable to these specific sources or their associated control devices as described above.

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)	2007 Actual Emissions (tpy)
CO	2.55	2.37
NO _x	3.06	2.81
PM ₁₀	0.24	0.22
SO ₂	0.01	0.01
VOC	68.38	57.86
Total HAP/TAP	0.656	0.329

IX. Stipulation Review

Eric Hudson of the WSRO noted the following items in his **September 18, 2007** inspection report:

1. Although the facility is permitted for two flour silos there are actually four. However, the additional two silos are located inside a concrete building and do not vent to the atmosphere and therefore do not require a permit.

2. In the packaging area there are printers that print the date and bar code on each package of buns and bread. Previously four video jet printers and three squid ink printers (**ID Nos. IA-VJP and IA-SIP**) were installed. The squid ink printers have been permanently removed and the video jet printers have been placed in storage. Seven new wax printers have been installed. The four video jet printers and the three squid ink printers are listed on the insignificant activities list, as they do not have the potential to emit greater than five tons per year of criteria pollutants or 1,000 pounds per year of any HAPs. The squid ink printers should be removed from the insignificant activity list and the wax printers may need to be added.

No stipulation modifications have been identified. Eric Hudson has noted that the facility appeared to be in compliance with the applicable air quality regulations.

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. The State of Virginia and the Forsyth County Local Program are affected areas 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.

WSRO recommends issuance of the permit and **was presented** with a DRAFT permit prior to notice and issuance (See History Section of this Document for a listing of dates).

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