

Air Permit Review

Permit Issue Date: **date, 2011**

Region: Raleigh Regional Office
County: Nash
NC Facility ID: 6400006
Inspector's Name: Will Wike
Date of Last Inspection: 06/21/2011
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Interstate Brands - Merita Facility Address: Interstate Brands - Merita 2551 North Church Street Rocky Mount, NC 27802 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: 6400006.11A Date Received: 06/22/2011 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04521/T09 Existing Permit Issue Date: 04/14/2010 Existing Permit Expiration Date: 03/31/2012
Robert Ray Chief Engineer (252) 450-6039 P.O. Box 591 Rocky Mount, NC 27802	Shawn Keiser Plant Manager (252) 997-3400 P.O. Box 591 Rocky Mount, NC 27802	Bart Petracca Field Environmental Coordinator (508) 954-6271 723 Lunn's Way Plymouth, MA 02360	
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2011		Comments / Recommendations: Issue 04521/T10 Permit Issue Date: date, 2011 Permit Expiration Date: date, 2016	

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 (**04521T09**) was issued on **April 14, 2010**, with an expiration date of **March 31, 2012**. The renewal application was received on **June 22, 2011**, 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 specializing in various store brand sliced breads and dinner rolls.

III. History/Background/Application Chronology

April 27, 2007 – Permit **04521T08** issued as a Title V renewal.

April 14, 2010 – Permit **04521T09** issued as a minor modification to allow combustion of propane (LPG) in the facility’s bread ovens.

June 21, 2011 – The RRO completed annual facility compliance inspection.

June 22, 2011 – Permit application **1400100.11A** received as a Title V permit renewal application. The application was not deemed complete for processing; an additional copy was requested via certified letter **July 5, 2011**. Third copy of application was received **July 21, 2011**. Application was deemed complete for processing.

July 26, 2011 – DRAFT permit sent to Supervisor, Permittee and RRO for comment prior to public notice and EPA review. John Evans commented via email on **July 27, 2011** on the draft permit. Specifically he questioned the need for the production limit and calculation methods for determining VOC compliance with the PSD avoidance limit of 250 tons per year. He suggested limiting the compliance method to the one currently being used by the Permittee in its annual inventory. RRO confirmed that the Permittee uses AP-42 emission factors (and associated emissions equations) in its reporting. I discussed this issue with Scott Johnson of Interstate Brands in a phone conversation on **August 16, 2011** and presented him with the compliance options (production limit or AP-42 emission factors). In an **August 19, 2011** email, he confirmed that the production limit could be removed for a more streamlined compliance option. The draft permit removes this requirement.

date, 2011 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

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

Pages	Section	Description of Changes
Cover	-	-amended permit revision numbers and all dates
All	Header	-amended permit revision number
3	Equipment table 2.1 A	-modified combustion source descriptions to add “direct-fired” notation -modified combustion source descriptions to add “direct-fired” notation
4	2.1 A.1.b 2.1 A.1.c 2.1 A.2.b 2.1 A.2.c	-corrected testing rule cross reference -updated shell language and added ID numbers -corrected testing rule cross reference -updated shell language and added ID numbers
5	2.1 A.3.b 2.1 A.3.c 2.1 B.1.b	-corrected testing rule cross reference -updated shell language and added ID numbers -corrected testing rule cross reference
6	2.1 B.2.c	-corrected testing rule cross reference
7	2.1 B.2.d	-updated shell visible emissions monitoring language
8	2.2 A.1.b	-removed paragraph limiting production of bread as unnecessary limit (renumbered subsequent sections and cross references as necessary)

Pages	Section	Description of Changes
9-19	General Conditions	-updated shell conditions (v3.4)

There were only minor, non-significant modifications to the equipment descriptions needed in TVEE.

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
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

A regulatory review for these current permit conditions will not be included in this document.

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

NSPS – The Permittee 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. As such, it should be reviewed for applicability to any of the promulgated GACT standards. Other than the GACT for combustion sources (40 CFR 63, Subpart JJJJJ), no other area-source GACT is applicable to this facility. The combustion GACT was promulgated on **March 21, 2011** with an effective date of **May 21, 2011**. The Permittee currently operates two natural gas/LPG-fired boilers (8.36 and 6.3 million Btu per hour heat input; **ID Nos. IES-B1 and IES-B2**) listed on the insignificant activities list. These sources have been analyzed for applicability to 40 CFR 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers.

These sources are categorized as existing gas-fired boilers. Per 63.11195(e) gas-fired boilers “are not subject to this Subpart and to any requirements in this Subpart.” 63.11237 defines gas-fired boiler as “any boiler that burns gaseous fuels not combined with any solid fuels.” Gaseous fuels include, but are not limited to natural gas. The definition of natural gas includes provisions for liquefied petroleum gas. Therefore, this Subpart is not applicable to this facility. This permit renewal does not affect this status.

PSD – The Permittee currently operates under a Prevention of Significant Deterioration avoidance limit of 250 tons per year for volatile organic compounds. In order to ensure compliance with this requirement, the Permittee shall limit bread production to less than 121,757 tons per year. Specific monitoring, recordkeeping, and reporting requirements are included in the current permit. 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 one or more 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. The following table indicates the current equipment/control device relationships at the facility:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-S1 through ES-S4	Four flour storage silos	CD-S1 through CD-S4	Four bagfilters (150 square feet of filter area each) installed one per silo

The following table outlines the specific permit conditions for each source/control device arrangement and if the control device is installed to comply with that requirement:

Emission Source ID No(s).	Control Device ID No(s).	Permit Condition(s)*	Control Equipment Installed to Meet Permit Limit?
ES-S1 through ES-S4	CD-S1 through CD-S4	15A NCAC 2D .0515	Particulates. Yes

* *The following permit conditions, where applicable, are not included in the CAM analysis:*

1. *15A NCAC 2D .0521 – This regulation limits visible emissions to specific opacity levels based on equipment manufacture date. Visible emissions are not criteria pollutants subject to CAM analysis.*
2. *15A NCAC 2D .1806 – This regulation limits odorous emissions from the facility. Odors are not criteria pollutants subject to CAM analysis.*

During the previous Title V renewal process, CAM was determined not to apply to any control device at this facility because potential particulate emissions were less than applicability thresholds of the regulation (See Steve Hall’s **April 27, 2007** permit review for **04521T08**).

VII. Facility Wide Air Toxics

The Permittee is not currently subject to NC Air Toxic requirements. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years’ emission inventories from the facility:

Pollutant(s)	2009 Actual Emissions (tpy)	2010 Actual Emissions (tpy)
CO	2.46	2.33
NOx	2.95	2.81
PM ₁₀	0.79	0.82
VOC	94.76	89.12
Total HAPs/TAPs	4.21	4.09

IX. Stipulation Review

The facility was last inspected by Will Wike of the RRO on **June 21, 2011**. Based on his observations the facility appeared to be operating in compliance with their Title V permit requirements.

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

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. 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 pursuant 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 is an affected state within 50 miles of this 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.

RRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

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