

## AIR PERMIT REVIEW

<b>APPLICANT</b> Flowers Baking Co., LLC	<b>SITE LOCATION</b> Jamestown	<b>COUNTY</b> Guilford
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<b>CONTACT</b> Rod Moore, Chief Engineer	<b>PHONE</b> 336-841-8840
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<b>APPLICATION FOR:</b> Renewal	<b>Existing P/N</b> 08250T03
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<b>APP. NO.</b> 4100996.02A	<b>REVIEWER</b> Jeff Twisdale	<b>SIGNATURE</b>	<b>DATE</b> January 30, 2004
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<b>RECOMMENDATION AND COMMENT</b> Issue Permit 08250T04	<b>FEE CLASS</b> Title V
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**1. Purpose of Application:**

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (04502T03) was issued on December 12, 2003 and is currently scheduled to expire on May 31, 2004. The renewal application was received on April 22, 2002 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.

**2. Facility Description:**

Flowers Baking Company of Jamestown, LLC (Flowers) is a commercial bakery that produces bread loaves and buns. Flour is delivered to the facility in trucks and conveyed pneumatically into three storage silos. The ingredients are mixed and allowed to ferment in a blend tank. Next the flour blend is pumped to a brew tank where additional ingredients are introduced. The dough is then cut, allowed to rise, and finally baked in one of three ovens (one bread and two bun ovens).

Changes to the permit are summarized below:

Old Page No.	New Page No.	Section	Change
Page 1	Page 1	Permittee Name	changed from Inc. to LLC
Page 2	Page 2	Table of Contents	removed the Part II Construction Permit and associated Sections
Page 3	Page 3	Section 1 Table - Description for the storage silos (SL1 & SL2) and associated bagfilters (SL1FF & SL2FF)	removed description for the silos and associated bagfilters since permitting is not required
Page 3	Page 3	Section 1 Table - Description and footnote(*) for the storage silo (SL4) & associated bagfilters (SL4FFS1 & SL4FFS2)	removed footnote and reference to Part II Construction Permit

Old Page No.	New Page No.	Section	Change
Page 5	Page 5	Section 2.1 B - Description for the storage silos (SL1 & SL2) and associated bagfilters (SL1FF & SL2FF)	removed description for the silos and associated bagfilters since permitting is not required
Page 5	Page 5	Section 2.1 B - Description and Table footnote (*) for the storage silo (SL4) & associated bagfilters (SL4FFS1 & SL4FFS2)	removed footnote and reference to Part II Construction Permit
Page 7	Page 6	Section 2.1 B.2.c. - Control of Visible Emissions for the storage silos and associated bagfilters	changed the monitoring frequency for the storage silos and associated bagfilters to weekly during loading
Pages 8 - 15	Pages 7 - 14	Part I Section 3 - General Conditions	updated the general conditions with the latest conditions available
Pages 16 - 18	NA	Part II Sections 1, 2 & 3 - Construction Permit Table and associated conditions (both specific and general)	removed the storage silo (SL4) & associated bagfilters (SL4FFS1 & SL4FFS2) in table plus applicable regulations and notification requirement conditions

### 3. Application Chronology

The renewal application was initially received on April 22, 2002. However, a 502(b)10 modification application was received July 10, 2003 and consolidated with the renewal application on July 29, 2003. Due to the time constraints with processing time associated with the renewal application, the 502(b)10 modification was separated from the renewal application per regional request on December 10, 2003. The attached IMPAQ Comprehensive Application Report details the application chronology.

### 4. Permit Modification/Changes

Pursuant to 2Q .0523, the following Section 502(b)(10) changes were made to the initial Title V permit (08250T02) by utilizing the Part II Construction Section of the Air Quality Permit:

- Flour silo (ID No. ES-SL4) and associated bagfilters (ID Nos. SL4FFS1 and SL4FFS2) were added under permit revision (08250T03) issued on December 12, 2003.

Pursuant to 2Q .0514, Flowers requested that the company name be updated to reflect LLC instead of Inc. Flowers also requested that the silos (ID Nos. SL1 & SL2) and associated bagfilters (ID Nos. SL1FF & SL2FF) be removed from the permit since they are in an enclosed concrete building and do not vent to atmosphere.

### 5. Regulatory Review

The facility is subject to the following regulations:

- 2D .0515 "Particulates from Miscellaneous Industrial Processes"
- 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
- 2D .0521 "Control Of Visible Emissions"

However, no regulatory review is required at this time since there are no new applicable regulations for this permit revision (renewal).

**6. NSPS, NESHAP, PSD, Attainment Status, 112(r), CAM**

**NSPS**

New Source Performance Standards (NSPS) do not apply to this facility.

**NESHAP/MACT**

This facility is not currently subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP).

**PSD**

This facility is not a major Prevention of Significant Deterioration (PSD) source.

**Attainment Status**

This facility is located in Guilford County which is currently in attainment according to 2D .0902.

**112(r)**

This 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.

**CAM**

Compliance Assurance Monitoring (CAM) (40 CFR Part 64) does not apply since each flour silo is not considered to be a major pollutant specific emission unit (a source with > 100 tons per year of particulate matter in this case). By using the uncontrolled emission factor (0.46 lb PM-10 per ton cement) in AP-42 Chapter 11.12 (Concrete Batching) to estimate the uncontrolled particulate matter emissions and considering that cement and flour have similar properties, each flour silo (maximum loading capacity of 33.5 tons per hour) has an uncontrolled emission rate of 15.4 pounds per hour or 67.5 tons per year.

**7. Facility Wide Air Toxics**

This facility is not subject to the state toxics program (2D .1100 or 2Q .0700).

**8. Facility Compliance Status**

Based on a telcon with Eric Hudson, WSRO on January 28, 2004, there are presently no compliance issues and no outstanding Notices of Violations (NOVs) for this facility. The facility was inspected on June 11, 2003 by Eric Hudson, WSRO and was considered to be out of compliance since the facility was found to be operating in violation of permit condition 2.1 C.2.e. for not recording visible emissions observations of the flour silos in a logbook. Also, a new flour silo and associated bagfilters were under construction without a permit to construct and operate and were considered to be a violation of 2Q .0101. A NOV was issued July 3, 2003 requesting action to rectify the documentation of visible emissions observations in the future and submittal of an air permit application for the new flour silo prior to July 17, 2003. The permit application was filed July 10, 2003 (see above in Application Chronology Section). The facility was in compliance after permit issuance of 8250T03.

## **9. Statement of Compliance**

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection, the facility was out of compliance, but those violations have been corrected. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

## **10. Facility Emissions Review**

There is no change in emissions for this renewal.

## **11. Stipulation Review**

All stipulations are standard for this type of facility.

## **12. Public Notice / EPA and Affected State Review**

Pursuant to 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 shall 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 2Q .0522, a copy of each permit application or application summary, 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. Virginia and Forsyth County are within 50 miles of Jamestown and are the only affected States for this facility.

## **13. 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 per Eric Hudson's regional review received June 4, 2002 and supplemental e-mail received January 28, 2004.

RCO concurs with WSRO's recommendation to issue air permit 08250T04.