

# MAJOR SOURCE OPERATING PERMIT

**PERMITTEE:** FLOWERS BAKERY OF MONTGOMERY, LLC  
**FACILITY NAME:** FLOWERS BAKERY OF MONTGOMERY, LLC  
**FACILITY/PERMIT NO.:** 209-0074  
**LOCATION:** MONTGOMERY, MONTGOMERY COUNTY, ALABAMA

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

**Issuance Date:** DRAFT  
**Effective Date:** August 7, 2025  
**Expiration Date:** August 6, 2030

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General Permit Provisos	
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<p><b>1. <u>Transfer</u></b></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code r. 335-3-16-.13(1)(a)5.</p>	<p>ADEM Admin. Code r. 335-3-16-.02(6)</p>
<p><b>2. <u>Renewals</u></b></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p>	<p>ADEM Admin. Code r. 335-3-16-.12(2)</p>
<p><b>3. <u>Severability Clause</u></b></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(e)</p>
<p><b>4. <u>Compliance</u></b></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(f)</p> <p>ADEM Admin. Code r. 335-3-16-.05(g)</p>
<p><b>5. <u>Termination for Cause</u></b></p> <p>This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(h)</p>

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<p><b>6. <u>Property Rights</u></b></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(i)</p>
<p><b>7. <u>Submission of Information</u></b></p> <p>The permittee must submit to the Air Division, within 30 days or for such other reasonable time as the Air Division may set, any information that the Air Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Air Division copies of records required to be kept by this permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(j)</p>
<p><b>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></b></p> <p>No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(k)</p>
<p><b>9. <u>Certification of Truth, Accuracy, and Completeness</u></b></p> <p>Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	<p>ADEM Admin. Code r. 335-3-16-.07(a)</p>
<p><b>10. <u>Inspection and Entry</u></b></p> <p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p> <ul style="list-style-type: none"> <li>(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;</li> <li>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</li> <li>(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.07(b)</p>

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<p>(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</p> <p><b>11. Compliance Provisions</b></p> <p>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</p> <p>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</p> <p><b>12. Compliance Certification</b></p> <p>The permittee shall submit a complete and accurate compliance certification by <b>October 6<sup>th</sup></b> of each year for each annual reporting period of this permit (August 7<sup>th</sup> through August 6<sup>th</sup>).</p> <p>(a) The compliance certification shall include the following:</p> <ol style="list-style-type: none"> <li>(1) The identification of each term or condition of this permit that is the basis of the certification;</li> <li>(2) The compliance status;</li> <li>(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);</li> <li>(4) Whether compliance has been continuous or intermittent;</li> <li>(5) Such other facts as the Air Division may require to determine the compliance status of the source;</li> </ol> <p>(b) The compliance certification shall be submitted to:</p> <p style="text-align: center;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p style="text-align: center;">and to:</p> <p style="text-align: center;">EPA Region 4 via email at <a href="mailto:EPA_R4_CAA_Reports@epa.gov">EPA_R4_CAA_Reports@epa.gov</a> or through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI)</p>	<p>ADEM Admin. Code r. 335-3-16-.07(c)</p> <p>ADEM Admin. Code r. 335-3-16-.07(e)</p>

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<p><b>13. Reopening for Cause</b></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <ul style="list-style-type: none"> <li>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</li> <li>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</li> <li>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</li> <li>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.13(5)</p>
<p><b>14. Additional Rules and Regulations</b></p> <p>This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p><b>15. Equipment Maintenance or Breakdown</b></p> <ul style="list-style-type: none"> <li>(a) In case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Air Division at least (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following: <ul style="list-style-type: none"> <li>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</li> <li>(2) The expected length of time that the air pollution control equipment will be out of service;</li> </ul> </li> </ul>	<p>ADEM Admin. Code r. 335-3-1-.07(1),(2)</p>

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<p>(3) The nature and quality of emissions of air contaminants likely to occur during the shutdown period;</p> <p>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</p> <p>(5) The reasons that it would be impossible or impractical to shut down the sources operation during the maintenance period.</p> <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director will be notified when the breakdown has been corrected.</p> <p><b>16. <u>Operation of Capture and Control Devices</u></b></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p> <p><b>17. <u>Obnoxious Odors</u></b></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p> <p><b>18. <u>Fugitive Dust</u></b></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p> <p>ADEM Admin. Code r. 335-3-1-.08</p> <p>ADEM Admin. Code r. 335-3-4-.02</p>



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<p>(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving;</p> <p>(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions.</p> <p>Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Air Division prior to utilization.</p> <p><b>19. Additions and Revisions</b></p> <p>Any modifications to this source shall comply with the modification procedures in ADEM Admin. Code r. 335-3-16-.13 or 335-3-16-.14.</p> <p><b>20. Recordkeeping Requirements</b></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <p>(1) The date, place, and time of all sampling or measurements;</p> <p>(2) The date analyses were performed;</p> <p>(3) The company or entity that performed the analyses;</p> <p>(4) The analytical techniques or methods used;</p> <p>(5) The results of all analyses; and</p> <p>(6) The operating conditions that existed at the time of sampling or measurement.</p> <p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.13 and 335-3-16-.14</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)2.</p>

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<p><b>21. <u>Reporting Requirements</u></b></p> <p>(a) Reports to the Air Division of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code r. 335-3-16-.04(9).</p> <p>(b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p> <p><b>22. <u>Emission Testing Requirements</u></b></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <p>(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).</p> <p>(c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p> <p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p> <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)3.</p> <p>ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)</p> <p>ADEM Admin. Code r. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-3-1-.04</p>

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<p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p> <p><b>23. <u>Payment of Emission Fees</u></b></p> <p>(a) The permittee shall submit the annual Operating Permit Fees required by ADEM Admin. Code r. 335-1-7-.04 according to the schedule in ADEM Admin. Code r. 335-1-7-.05.</p> <p>(b) The permittee shall submit its estimates of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code r. 335-1-7-.05.</p> <p><b>24. <u>Other Reporting and Testing Requirements</u></b></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p> <p><b>25. <u>Title VI Requirements (Refrigerants)</u></b></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR §82.166. Reports shall be submitted to the US EPA and the Department as required.</p> <p><b>26. <u>Chemical Accidental Prevention Provisions</u></b></p> <p>If a chemical listed in Table 1 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p>	<p>ADEM Admin. Code r. 335-1-7-.05</p> <p>ADEM Admin. Code r. 335-3-7-.05</p> <p>ADEM Admin. Code r. 335-3-1-.04(1)</p> <p>ADEM Admin. Code r. 335-3-16-.05(a)</p> <p>40 CFR Part 68</p>

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<p>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,</p> <p>(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</p>	
<b>27. <u>Display of Permit</u></b>	
<p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will make the permit readily available for inspection by any or all persons who may request to see it.</p>	ADEM Admin. Code r. 335-3-16-.02(2)
<b>28. <u>Circumvention</u></b>	
<p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	ADEM Admin. Code r. 335-3-1-.10
<b>29. <u>Visible Emissions</u></b>	
<p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	ADEM Admin. Code r. 335-3-4-.01(1)
<b>30. <u>Fuel-Burning Equipment</u></b>	
<p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.03.</p>	ADEM Admin. Code r. 335-3-4-.03
<p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-5-.01.</p>	ADEM Admin. Code r. 335-3-5-.01
<b>31. <u>Process Industries – General</u></b>	
<p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.04.</p>	ADEM Admin. Code r. 335-3-4-.04

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<p><b>32. <u>Averaging Time for Emission Limits</u></b></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p>
<p><b>33. <u>Open Burning</u></b></p> <p>Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.</p>	<p>ADEM Admin. Code r. 335-3-3-.01</p>

**Emission Unit Nos. 001, 002, 003, and 011 (Oven Nos. 1, 2, 3, and 5)**

**Summary Page**

**Description:**

<b>Emission Unit</b>	<b>Equipment Description</b>	<b>Production Capacity (lb/hr)</b>	<b>Fuel Heat Input (MMBtu/hr)</b>	<b>Fuel Source</b>
001 (Oven No. 1)	Latendorf Wilco Model 6076 bread baking oven	12,000	5.85	Primary: Natural Gas Secondary: LP Gas
002 (Oven No. 2)	Baker Perkins Model 960 roll baking oven	5,600	4.05	
003 (Oven No. 3)	Baker Perkins Model 960 roll baking oven	5,600	3.3	
011 (Oven No. 5)	Sugdens, Ltd. muffin baking oven	3,900	3.7	

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{365 \text{ Days}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission Limitations:**

<b>Emission Point Nos.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Limit</b>	<b>Regulation</b>
001	Baking Process Emissions (Oven No. 1)	VOC	<b>Cumulative Emission Limit:</b> 240 Tons during any consecutive 12-month period	ADEM Admin. Code r. 335-3-14-.04
002	Baking Process Emissions (Oven No. 2)			
003	Baking Process Emissions (Oven No. 3)			
011	Baking Process Emissions (Oven No. 5)			
001 002 003 011	Combustion Emissions (Oven Nos. 1, 2, 3, and 5)	NO <sub>x</sub>	N/A	N/A
		CO	N/A	N/A
		SO <sub>2</sub>	N/A	N/A
		PM	N/A	N/A
		VOC	N/A	N/A

**Emission Unit Nos. 001, 002, 003, and 011 (Oven Nos. 1, 2, 3, and 5)**

**Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<b>1. <u>Applicability</u></b>	
(a) These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-16-.03
(b) These units are subject to a synthetic minor source emission limit to restrict their potential to emit below the applicability threshold established at ADEM Admin. Code r. 335-3-14-.04, Air Permits Authorizing Construction in Clean Areas [Prevention of Significant Deterioration (PSD)].	ADEM Admin. Code r. 335-3-14-.04
<b>2. <u>Emission Standards</u></b>	
(a) The permittee shall not cause or allow the baking process emissions of volatile organic compounds (VOC) to exceed 240 tons during any consecutive 12-month period.	ADEM Admin. Code r. 335-3-14-.04
(b) The ovens shall only be fired with natural gas or LP gas.	ADEM Admin. Code r. 335-3-4-.01
(c) The permittee shall not discharge more than one six-minute average opacity greater than 20% during any 60-minute period from each of these units. At no time shall the permittee discharge a six-minute average opacity of particulate emissions greater than 40% from each of these units.	ADEM Admin. Code r. 335-3-4-.01(1)
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>	
(a) If emission testing is required, VOC emissions from the baking process shall be measured in accordance with U.S. EPA Reference Method 18 or 25A found at 40 CFR Part 60, Appendix A.	ADEM Admin. Code r. 335-3-1-.05
(b) VOC emissions from the baking process shall be calculated using the tons of production of each product and the appropriate emission factor derived from the following emission factor equation found in <i>AP-42, Section 9.9.6 – Bread Baking, February 1997</i> :	ADEM Admin. Code r. 335-3-1-.05

Federally Enforceable Provisos	Regulations
<p><b>VOC EF = 0.95Y<sub>i</sub> + 0.195t<sub>i</sub> - 0.51S - 0.86t<sub>s</sub> + 1.90</b></p> <p>Where:</p> <p>VOC EF = pounds VOC per ton of baked bread</p> <p>Y<sub>i</sub> = Initial baker's percent of yeast to the nearest tenth of a percent</p> <p>t<sub>i</sub> = Total yeast action time in hours to the nearest tenth of an hour</p> <p>S = Final (spike) baker's percent of yeast to the nearest tenth of a percent</p> <p>t<sub>s</sub> = Spiking time in hours to the nearest tenth of an hour</p>	
<p><b>4. <u>Emission Monitoring</u></b></p> <p>(a) The permittee shall certify semiannually that only natural gas or LP gas was fired in each oven.</p> <p>(b) Within 10 days of the conclusion of each calendar month, the permittee shall calculate and record the VOC emissions from the baking process for the previous calendar month and previous 12-month period to determine compliance with the VOC emission limitation.</p> <p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) Records of production sufficient to accurately calculate the VOC emissions in accordance with the method prescribed above shall be maintained. These records shall consist of a daily record of operations, which shall include, but may not be limited to, the type and amount of product produced, the yeast percentage for each product, and the fermentation time for each product. These records shall be maintained in a permanent form suitable for inspection for a period of 5 years from the date of each record and be made available for inspection upon request.</p> <p>(b) A record of the VOC emissions calculated for each calendar month and each consecutive 12-month period shall be maintained. These records shall be maintained in a permanent form suitable for inspection for a period of 5 years from the date of each record and be made available for inspection upon request.</p> <p>(c) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual period (March 1<sup>st</sup> - August 31<sup>st</sup> and September 1<sup>st</sup> - February 28<sup>th</sup>). The report shall include the following:</p> <p>(i) A certification that only natural gas or LP gas was fired in each oven; and</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>



Federally Enforceable Provisos	Regulations
(ii) A copy of the records required by Proviso 5(b) above for the respective reporting period.	

**Emission Unit Nos. 004-008 (Flour Storage Silo Nos. 1-5)****Summary Page****Description:**

<b>Emission Unit</b>	<b>Equipment Description</b>	<b>Product Capacity (lbs)</b>	<b>Material Stored</b>
004 (Silo No. 1)	Fred Pfeng Corp Model #D53853 Storage Silo	150,000	Flour
005 (Silo No. 2)	Fred Pfeng Corp Model #D53853 Storage Silo	150,000	
006 (Silo No. 3)	Fred Pfeng Corp Model #D53853 Storage Silo	150,000	
007 (Silo No. 4)	Fred Pfeng Corp Model #D53853 Storage Silo	150,000	
008 (Silo No. 5)	Fred Pfeng Corp Model #D53853 Storage Silo	100,000	

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{365 \text{ Days}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission Limitations:**

<b>Emission Point Nos.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Limit</b>	<b>Regulation</b>
004 005 006 007 008	Flour Storage Silo Nos. 1-5	PM	$E=3.59P^{0.62}$ [P < 30 TPH]  OR $E=17.31P^{0.16}$ [P ≥ 30 TPH]	ADEM Admin. Code r. 335-3-4-.04

**Emission Unit Nos. 004-008 (Flour Storage Silo Nos. 1-5)****Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p><b>1. <u>Applicability</u></b></p> <p>These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter from these silos to exceed the amount determined by the following equation:</p> $E = 3.59P^{(0.62)} \quad (P < 30 \text{ TPH})$ <p style="text-align: center;"><b>OR</b></p> $E = 17.31P^{(0.16)} \quad (P \geq 30 \text{ TPH})$ <p>Where:</p> <p style="margin-left: 40px;"><math>E</math> = Emissions in pounds per hour (lb/hr)</p> <p style="margin-left: 40px;"><math>P</math> = Process weight in tons per hour (TPH)</p> <p>(b) The permittee shall not discharge more than one six-minute average opacity greater than 20% in any 60-minute period from each of these units. At no time shall the permittee discharge a six-minute average opacity of particulate emissions greater than 40% from each of these units.</p> <p>(c) The permittee shall transfer flour into only one silo at a time.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) If testing is required, the particulate emission rate shall be measured in accordance with EPA Reference Method 5 at 40 CFR Part 60, Appendix A.</p> <p>(b) If testing is required, the opacity of particulate emissions from the silos shall be determined in accordance with EPA Reference Method 9 at 40 CFR Part 60, Appendix A.</p> <p><b>4. <u>Emission Monitoring</u></b></p> <p>(a) For each silo, at least once per week while flour is being transferred into the silo, someone familiar with the process shall observe the silo for greater than normal visible emissions.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-4-.01</p> <p>ADEM Admin. Code r. 335-3-4-.01</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(b) If greater than normal visible emissions are observed, corrective actions to minimize emissions shall be initiated within 24 hours of the observation, followed by an additional observation to confirm that visible emissions have been returned to normal.</p> <p>(c) The permittee shall inspect and replace the bin vent filters at least annually, but more frequently if greater than normal visible emissions are observed.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) For each silo, the permittee shall maintain a record of the date, time, and result of each visible emissions observation; date, time, and nature of any corrective action taken; and date, time, and nature of any emissions-related maintenance performed. These records shall be maintained in a permanent form suitable for inspection and be made available upon request for a period of 5 years from the date of generation.</p> <p>(b) For each silo, the permittee shall maintain a record of the date and result of each bin vent filter inspection. These records shall be maintained in a permanent form suitable for inspection and be made available upon request for a period of 5 years from the date of generation.</p> <p>(c) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual period (March 1<sup>st</sup> - August 31<sup>st</sup> and September 1<sup>st</sup> - February 28<sup>th</sup>). The report shall include the following:</p> <p>(i) A statement as to whether all required emission monitoring was accomplished as required, and if not, describe the date and reason any required monitoring was not accomplished; and</p> <p>(ii) Report any instances when visible emissions greater than normal were observed and identify the date and nature of any corrective actions taken to return the visible emissions to normal.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

## Emission Unit No. 009 (Ink Application Process)

### Summary Page

**Description:** Various ink jet printers used to code date the bread and roll packages

**Permitted Operating Schedule:** 
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$$

### Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
009	Ink Application Process (Fugitive Emissions)	VOC	N/A	N/A
		HAP	N/A	N/A

**Emission Unit No. 009 (Ink Application Process)**

**Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<b>1. <u>Applicability</u></b>  This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-16-.03
<b>2. <u>Emission Standards</u></b>  There are no unit specific emission standards applicable to this process.	N/A
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>  There are no unit specific compliance and performance test methods or procedures applicable to this process.	N/A
<b>4. <u>Emission Monitoring</u></b>  There are no unit specific emission monitoring requirements applicable to this process.	N/A
<b>5. <u>Recordkeeping and Reporting Requirements</u></b>  There are no unit specific recordkeeping or reporting requirements applicable to this process.	N/A

**Emission Unit No. 012 (Fire Pump Engine)**  
**Summary Page**

**Description:** 218 hp Cummins Model N-855-F, Diesel-fired Reciprocating Internal Combustion Engine for use as a Fire Pump Engine

**Permitted Operating Schedule:** 8760 Hrs/Yr

**Emission Limitations:**

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
012	218 hp Cummins Model N-855-F, Diesel-fired Reciprocating Internal Combustion Engine for use as a Fire Pump Engine	NO <sub>x</sub>	N/A	40 CFR Part 63, Subpart ZZZZ
		CO	N/A	
		VOC	N/A	
		SO <sub>2</sub>	N/A	
		PM	N/A	
		HAP	N/A	

**Emission Unit No. 012 (Fire Pump Engine)**

**Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p><b>1. <u>Applicability</u></b></p> <p>(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This unit is subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), and meets the definition for an emergency stationary RICE as defined by 40 CFR §63.6675. The permittee shall only operate this unit as emergency stationary RICE as provided by 40 CFR §63.6640(f).</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall comply with the applicable requirements of 40 CFR §63.6603 and Table 2d to Subpart ZZZZ, which include, but may not be limited to:</p> <p>(i) Meet the following work practice requirements, except during periods of startup:</p> <p>A. Change oil and filter every 500 hours of operation or within one year plus 30 days of previous change, whichever comes first; <i>or</i> participate in the oil analysis program per 40 CFR §63.6625(i);</p> <p>B. Inspect air cleaner every 1,000 hours of operation or within one year plus 30 days of previous inspection, whichever comes first, and replace as necessary; and</p> <p>C. Inspect all hoses and belts every 500 hours of operation or within one year plus 30 days of previous inspection, whichever comes first, and replace as necessary.</p> <p>(ii) During periods of startup, minimize the engine's time spent at idle and minimize the engine's time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>40 CFR Part 63, Subpart ZZZZ</p> <p>40 CFR Part 63, Subpart ZZZZ</p>





Federally Enforceable Provisos	Regulations
<p>(b) The permittee shall operate and maintain this unit according to the manufacturer's emission-related operation and maintenance instructions or develop and follow a maintenance plan that provides for, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.</p>	<p>40 CFR Part 63, Subpart ZZZZ</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p>	
<p>(a) The permittee shall keep records of the operation and maintenance of this unit in accordance with 40 CFR §63.6655. At a minimum, these records shall include:</p> <ul style="list-style-type: none"> <li>(i) For each period of operation, the length of operation and the reason the engine was in operation during that time. For periods of operation designated as "emergency operation," the records shall reflect what classified the operation as emergency;</li> <li>(ii) The total number of hours the engine was operated during a calendar year subtotaled by the reason the engine was in operation;</li> <li>(iii) The dates of each oil and filter change with the corresponding hour on the hour meter; <i>or</i> the dates of each oil analysis with the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine;</li> <li>(iv) The dates of each inspection and replacement of air cleaners, hoses, and belts with the corresponding hour on the hour meter; and</li> <li>(v) The dates and nature of other emission-related repairs and maintenance performed.</li> </ul>	<p>ADEM Admin Code r. 335-3-16-.05(c) and 40 CFR Part 63, Subpart ZZZZ</p>
<p>(b) The permittee shall maintain on-site for the life of this unit either a copy of the manufacturer's emission-related operation and maintenance instructions for the unit or the maintenance plan developed in accordance with 40 CFR §63.6625(e) for the unit.</p>	<p>40 CFR Part 63, Subpart ZZZZ</p>
<p>(c) The permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 63, Subparts A and ZZZZ for this unit recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on-site. The remaining 3 years of data may be retained off-site.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c), and 40 CFR Part 63, Subpart ZZZZ</p>

Federally Enforceable Provisos	Regulations
<p>(d) The permittee shall report to the Air Division any failure to perform a work practice on the schedule required, including instances when the work practice standard was not performed due to emergency operation or unacceptable risk under a federal, state, or local law. The permittee shall submit the report within two (2) working days of the deviation and shall provide an explanation as to why the work practice requirement was not performed.</p> <p>(e) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual period (March 1<sup>st</sup> - August 31<sup>st</sup> and September 1<sup>st</sup> - February 28<sup>th</sup>). The report shall include the following:</p> <ul style="list-style-type: none"> <li>(i) A statement as to whether all required emission monitoring was accomplished as required, and if not, describe the date and reason any required monitoring was not accomplished; and</li> <li>(ii) Report any instances when visible emissions greater than normal were observed and identify the date and nature of any corrective actions taken to return the visible emissions to normal.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05(c) and 40 CFR Part 63, Subpart ZZZZ</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>