TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Lantmannen Unibake USA, Inc.
1927 4th Avenue South
St. Petersburg, Florida 33712-1302

Facility ID No. 1030518

PROJECT

Project No. 1030518-008-AC
Application for Minor Air Construction Permit
Project Name: Install New Mecatherm Oven

COUNTY

Pinellas County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-0926

January 23, 2014

Prepared by Amanda Tucker

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Facility Description:

This facility produces a variety of frozen baked artisan products, which includes a variety of breads and rolls. The product starts as a mixture of miscellaneous ingredients comprised primarily of white flour and water. Various ingredients, including yeast, are then added to produce the dough. The dough then goes through various stages in the process including molding, proofing, slicing, baking, cooling, freezing and then packaging. All finished products are then stored in the warehouse freezer awaiting shipping to various customers throughout the United States.

This facility includes three flour silos, three baking lines for yeast-based products and three exempt boilers housed in an approximately 55,000 square feet building. The three baking lines include two Mecatherm lines and a Rheon line.

II. Project Description:

A. Applicant:

Mr. Adrian Cimpean
Lantmannen Unibake USA, Inc.
1927 4th Avenue South
St. Petersburg, Florida 33712-1302

B. Professional Engineer:

Mr. Robert E. Wallace, III P.E.
Environmental Engineering Consultants, Inc.
rwallace@eec-tampbay.com

C. Project Location:

1927 4th Avenue South
St. Petersburg, Florida 33712-1302

D. Project Summary:

The existing Rheon oven (EU 002) will be removed and replaced by a new Mecatherm oven with a capacity of 4600 lbs/hour or 2.3 tons/hour. The new oven is "Oven Type FTM 2500-115-4." Installation of a new exempt Cleaver Brooks ClearFire Boiler fired on natural gas. The existing Three Aldrich boilers will remain as a backup to the new single boiler. The heat input for the new boiler will be 1.20705 MMBtu/hour which is larger than the existing 3 boilers combined at 0.95 MMBtu/hour, as further described in the permit.

E. Application Information:

Application Received on: December 16, 2013
Application Complete on: December 16, 2013

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Facility is a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	baking line #1 (EU 001), baking line #2 (EU 002), and baking line #4 (EU 005) of the baking operation are a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	there is no applicable source category
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required. Compliance is demonstrated via recordkeeping.

IV. Summary of Emissions

001 - Baking Line #1 (Mecatherm Line)

004 - Three Flour Storage Silos

005 - Baking Line #4 (Mecatherm Line)

006 - Baking Line #2 (Mecatherm Line)

Pollutant	**EU No. and brief description**	**Potential Emissions** (tpy)	**Allowable Emissions (**tpy)
PM/PM10	004	0.013	n/a
VOC	001	19.3	19.3
	005	38.6	38.6
	006	40.3	40.3
	Total	**98.2**	**98.2**
VE Limitation			
VE	EU 001		Less Than 20%
	EU 002		Less Than 20%
	EU 004		Less Than 20%
	EU 005		Less Than 20%

Note:

(1) A VOC emission factor of 4.0 lb of VOC/Ton of bread was used to calculate the VOC potential emission shown above. The emission factor was determined using the equation contained in AP 42, Chapter 9.9.6 and worst-case parameters supplied in the additional information response letter dated 4/23/2007.

(2) VOC potential emissions of the existing facility increased by approximately 24.8 tons/year as a result of removing EU-002 and adding EU-006 (from 73.4 to 98.2 TPY).

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).