FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

DRAFT PERMIT

PERMITTEE

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

Authorized Representative:
Mr. Adrian Cimpean
Facility Manager

Air Permit No. 1030518-008-AC
Permit Expires: 01/31/2016
Minor Air Operation Permit
Project Name: Air Construction Permit
Install New Mecatherm Oven

This is the final air construction permit for a baking operation. The proposed work will be conducted at the Lantmannen Unibake USA, Inc. facility (Standard Industrial Classification No. 2051). The facility is located in Pinellas County at 1927 4th Avenue South in St. Petersburg, Florida. The UTM coordinates are Zone 17, 336.45 km East, and 3072.60 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Adrian Cimpean, Lantmannen Unibake USA, Inc.
adrian.cimpean@lantmannen.com

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

Mr. Marvin Scott, Environmental Engineering Consultants, Inc.
mscott@eec-tampabay.com

Mr. Gary Robbins, Pinellas County Air Quality Division (PCAQD)
grobbins@co.pinellas.fl.us

Mr. Sherrill Culliver, Pinellas County Air Quality Division (PCAQD)
sculliver@pinellascounty.org

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

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.

Operations at this facility also include the following activities:

(1) Racks of baked bread are cooled after they have been removed from the ovens by forcing air across the bread and through a vent to the outside of the building. The process removes heat from the racks of bread and is not of source of air pollution.

(2) In addition to the standard products, the facility also bakes seeded breads and breads containing cheese ingredients. During the baking of these products, the potential for visible emissions from oven vents (exceeding the facility wide opacity limit of less than 20 %) exists. To reduce visible emissions below the facility wide opacity limit, the facility may utilize exit blowers that will add sufficient volumes of air to the oven vents. The use of baking pans with special surface coatings (parchment paper, silicone coated) may also allow the production of these special products with acceptable visible emissions.

The existing facility consists of the following emissions units.

Facility ID No. 1030518

EU ID No.	Emission Unit Description
001	Baking Line #1 (Mecatherm Line)
002	Baking Line #2 (Rheon Line)
004	Three Flour Storage Silos
005	Baking Line #4 (Mecatherm Line)

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Project Description and Affected Emission Unit

This project will remove the existing Rheon oven (EU 002) and will install a new Mecatherm oven (EU 006) with a capacity of 4,600 lbs/hour or 2.3 tons/hour. The new oven is "Oven Type FTM 2500-115-4." This project will also add a new exempt Cleaver Brooks ClearFire Boiler fired on natural gas. The existing Three Aldrich boilers will remain as backups to the new single boiler. The heat input capacity for the new boiler will be 1.27

MMBtu/hour which is larger than the existing 3 boilers combined at 0.95 MMBtu/hour. This project will modify the following emissions units (EUs).

EU ID No.	Emissions Unit Description
002	Baking Line #2 (Rheon Line) *{this equipment will be removed as part of this project}*
006	Baking Line #2 (Mecatherm Line)

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc*.

Exempt Emission Sources/Activities

The following equipment items are exempt from permitting pursuant to the "Categorical and Conditional Exemptions" of Rule 62-210.300(3)(a)34., F.A.C. The exempt boilers and burners are described below.

- Cleaver Brooks ClearFire boiler fired with natural gas. The heat input capacity is 1.27 MMBtu/hour.
- Three Aldrich boilers (model number DG 280 SC) fired with natural gas. The heat input capacity is 0.315 MMBTU/hour for each boiler and 0.95 MMBtu/hour for the three combined. These boilers are backup to the Cleaver Brooks ClearFire boiler.
- Eight natural gas burners used in the Mecatherm oven and described in EU ID. No. 001. The heat input capacity of the eight burners combined is 1.27 MMBtu/hour.
- Six natural gas burners used in the Mecatherm oven and described in EU ID. No. 005. The heat input capacity of the six burners combined is 4.17 MMBtu/hour.
- Four natural gas burners used in the Mecatherm oven described in EU ID No. 006. The heat input capacity of the four burners combined is 2.52 MMBtu/hour.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant VOC. The emissions limitations in this permit will ensure that the facility's VOC emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Reference Operation Permit No. 1030518-007-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Objectionable Odor - No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere that by itself or in combination with other odors is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-296.320(2) and 62-210.200, Definitions-(Objectionable Odors), F.A.C.; Pinellas County Code Subsection 58-178]

9. Special Compliance Test - If the Department and/or PCAQD, after investigation, have good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department and the PCAQD.
[Rule 62-297.310(7)(b), F.A.C.]

10. Application for Non-Title V Air Operation Permit - This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition No(s). A.3.

The application shall be submitted to the Permitting Authority with a copy to Pinellas County Air Quality Division (Compliance Authority).

[Rules 62-4.030, 62-4.050 and 62-4.220, F.A.C.]

A. EU Nos. 001, 005 & 006 Baking Line

This section of the permit addresses the following emissions units (EUs).

EUID No.	Emission Unit Description
001	Baking Line #1 (Mecatherm Line): This emissions unit consists of the Mecatherm Line which is a continuous non-stop baking line with a bread production capacity of 1.1023 tons/hour and 9,656 tons/year. The Mecatherm line includes molding, proofing, slicing, baking (one oven), cooling, and freezing with very little labor involved. The line works on the principle of conveyor movement from station to station as bread or rolls are packaged and moved to the freezer. This Mecatherm Line has one oven equipped with 8 exempt natural gas burners. Each burner has a heat input rating of 0.1587 MMBTU/hour for a total design heat input rating of 1.270 MMBtu/hour. Pollutants generated by this emission unit include VOCs generated from fermentation using yeast in the bread production process and the products of combustion resulting from the use of natural gas burners.
005	Baking Line #4 (Mecatherm Oven): This emission unit consists of a "Mecatherm" oven with a bread production capacity of 2.2046 tons/hour and 19,312 tons/year. The Mecatherm Oven has 6 exempt natural gas burners with a total design heat input rate of 4.167 MMBtu/hours. Pollutants generated by this emission unit include volatile organic compounds (VOCs) generated from fermentation using yeast in the bread production process and the products of combustion resulting from the use of natural gas burners.
006	Baking Line #2 (Mecatherm Line): This emissions unit consists of a new Mecatherm Line with a bread production capacity of 2.3 tons/hour and 20,148 tons/year. The new oven is "Oven Type FTM 2500-115-4." The oven is a four cells oven, equipped with 4 exempt natural gas burners. Burner 1 has a heat capacity of 0.682 MMBtu/hour and burners 2, 3, &4 have a heat capacity of 0.614 MMBtu/hour each for a total design heat input rate of 2.524 MMBtu/hour. Pollutants generated by this emission unit include VOCs generated from fermentation using yeast in the bread production process and the products of combustion resulting from the use of natural gas burners.

PERFORMANCE RESTRICTIONS

A.1. Operational Hours - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.]

EMISSIONS STANDARDS

A.2. VOC Emissions Standard – VOC emissions from the following emissions units shall not exceed the following limit:

E.U. ID No.	Annual VOC Emissions (tons per any consecutive 12-month period)
001	19.3
005	38.6
006	40.3

[Permit Application dated 12/13/2013 and Rule 62-210.200 (Definition of Potential to Emit), F.A.C.]

RECORDS AND REPORTS

A.3. Monthly Log - The permittee shall maintain appropriate records to document compliance with the VOC emission limits of Specific Condition No. A.2. The records shall include, but are not limited to, the following:

a. Facility Name, Facility Number (1030518), Emissions Unit Numbers (001, 005, 006), Month, Year;

b. For each emissions unit (001, 005, 006);

1. The total quantity of bread produced (in tons) for the month;
2. The calculated quantity of VOCs emitted (in pounds or tons) for the month as follows;

VOC Emissions Equation
VOCs emitted = Tons of bread produced x VOC Emission Factor*

**VOC Emission Factor = 4 pounds of VOCs / ton of baked bread*

3. The sum of VOCs emitted (in tons) for the most recent consecutive 12-month period.

(Permitting Note: The VOC emission factor was determined based upon use of the equation below (ref: EPA document number 453/R-02-017, Alternative Control Technology Document for Bakery Oven Emissions, 12/92) and the worst case parameters supplied by the applicant in the revised permit application dated 4/23/2007.)

$$VOC\ Emission\ Factor = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

Where:

VOC E.F.	*= pounds VOC per ton of baked bread*
Y_i	*= initial baker's percent of yeast to the nearest tenth of a percent*
t_i	*= total yeast action time in hours to the nearest tenth of an hour*
S	*= final (spike) baker's percent of yeast to the nearest tenth of a percent*
t_s	*= spiking time in hours to the nearest tenth of an hour*

[Rule 62-4.070(3), F.A.C.]

A.4. Records Retention – Monthly records shall be completed by the end of the following month. All records required by this permit shall be maintained at the facility for at least three years, unless otherwise noted, and be made available to the Department and/or PCAQD for inspection upon request.
[Rule 62-4.160(14)(b), F.A.C.]