



State of Utah

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Department of
Environmental Quality

L. Scott Baird
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DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN147800002-20

November 4, 2020

Justus Larson
United States Bakery
dba Franz Bakery, Salt Lake City
315 NE 10th Avenue
Portland, OR 97232

Dear Mr. Larson:

Re: Intent to Approve:
Modification to Approval Order DAQE-AN147800001-13 for Ownership Change and Addition
of Equipment
Project Number: N147800002

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Mr. Enqiang He**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Mr. Enqiang He, can be reached at (801) 556-1580 or ehe@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:EH:sa

cc: Salt Lake County Health Department

STATE OF UTAH

**Department of Environmental Quality
Division of Air Quality**

**INTENT TO APPROVE
DAQE-IN147800002-20
Modification to Approval Order DAQE-AN147800001-13
for Ownership Change and Addition of Equipment**

**Prepared By
Mr. Enqiang He, Engineer
(801) 556-1580
ehe@utah.gov**

**Issued to
United States Bakery**

**Issued On
November 4, 2020**

A handwritten signature in cursive script, appearing to read "Alan D. Humpherys".

**New Source Review Section Manager
Alan D. Humpherys**

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GENERAL INFORMATION**CONTACT/LOCATION INFORMATION****Owner Name**

United States Bakery dba Franz Bakery, Salt Lake City

Source Name

United States Bakery

Mailing Address

315 NE 10th Avenue
Portland, OR 97232

Physical Address

8556 South 2940 West
West Jordan, UT 84088

Source Contact

Name Micah Stevens
Phone (801) 604-0400
Email micah.stevens@usbakery.com

UTM Coordinates

418,501 m Easting
4,494,291 m Northing
Datum NAD83
UTM Zone 12

SIC code 2051 (Bread & Other Bakery Products, Except Cookies & Crackers)

SOURCE INFORMATION**General Description**

United States Bakery (USB), dba Franz Bakery, Salt Lake City, operates a bakery to make bread, buns, cookies, muffins, and donuts. Dry or moist ingredients are mixed, divided, rounded, molded, and proofed. The ingredients are then baked or fried. Emissions include natural gas combustion from boilers, ovens, fryers, deep frying operations, material loading/unloading and mixing, and yeast fermentation processes.

NSR Classification

Minor Modification at Minor Source

Source Classification

Located in Southern Wasatch Front O3 NAA, Salt Lake City UT PM_{2.5} NAA, Salt Lake County SO₂ NAA

Salt Lake County

Airs Source Size: B

Applicable Federal Standards

None

Project Description

USB has purchased the assets of Rocky Mountain Bread Co. Inc. (RMB) and Dunford Bakeries Inc. (Dunford). RMB operated under AO DAQE-AN147800001-13 in West Jordan. Dunford operated next to RMB. USB has requested to modify the AO to include all equipment currently operated by either company. Specifically, the source has requested to add the following equipment:

Miscellaneous natural gas combustion equipment including boilers, ovens, fryers, three (3) mixers and three (3) silos

The natural gas combustion equipment is each rated at less than 5 MMBtu/hr.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO ₂ Equivalent	5704	9404.00
Carbon Monoxide	2.82	5.77
Nitrogen Oxides	3.81	6.87
Particulate Matter - PM ₁₀	0.85	1.08
Particulate Matter - PM _{2.5}	0.85	1.08
Sulfur Dioxide	0.02	0.04
Volatile Organic Compounds	16.62	41.54

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Generic HAPs (CAS #GHAPS)		260
	Change (TPY)	Total (TPY)
Total HAPs		0.13

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the ITA will be published in the Salt Lake Tribune and Deseret News on November 7, 2020. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]

SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A THE APPROVED EQUIPMENT

II.A.1	United States Bakery Bakery
II.A.2	Misc. Natural Gas Combustion Equipment Including boilers, ovens, and fryers Each equipment is rated less than 5 MMBtu/hr Total rated capacity is 21 MMBtu/hr or less

II.A.3	Three (3) Mixers Venting to the inside of building Listed for information only
II.A.4	Three (3) Flour Silos Each is rated at 50 tons or less Emissions from the silos are controlled with a baghouse.

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	Source-Wide Requirements
II.B.1.a	The owner/operator shall control emissions from the flour silos with a baghouse during loading/unloading operations. [R307-401-8]
II.B.1.b	The owner/operator shall not allow visible emissions from any emission unit on site to exceed 10% opacity. [R307-401-8]
II.B.1.b.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]
II.B.2	VOC Limit
II.B.2.a	The owner/operator shall not allow VOC emissions from yeast-raised bread baking operations to exceed 41 tons per rolling 12-month period. [R307-401-8]
II.B.2.a.1	Compliance with the limitation shall be determined on a rolling 12-month total. No later than 28 days after the end of each month a new 12-month total shall be calculated using data from previous 12 months. [R307-401-8]
II.B.2.a.2	VOC emissions from yeast-raised bread baking operations shall be calculated using the following formula: $\text{VOC emissions} = (\text{Daily tons of baked products})(\text{VOC emission factor})/2000$ <p>Where:</p> <p>VOC emissions in tons per day Daily tons of baked products include bread, buns, and donuts VOC emission factor in lbs of VOC per ton of baked products</p> [R307-401-8]

II.B.2.a.3	<p>VOC emission factor from yeast-raised bread baking operations shall be calculated using the following formula:</p> $\text{VOC emission factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$ <p>Where:</p> <p>VOC emission factor in lbs of VOC per ton of baked products Y_i = initial baker's percent of yeast t_i = total yeast action time in hours S = final (spike) baker's percent of yeast, and t_s = spiking time in hours</p> <p>[R307-401-8]</p>
II.B.2.a.4	<p>The owner/operator shall maintain daily records of the above parameters used to calculate the VOC emissions and VOC emission factor. The records of baked products shall include bread, buns and donuts and shall be determined by sales records. All the records shall be kept on a daily basis. [R307-401-8]</p>

PERMIT HISTORY

This Approval Order shall supersede or will be based on the following documents:

Supersedes	AO DAQE-AN147800001-13 dated June 5, 2013
Is Derived From	NOI dated February 21, 2020
Incorporates	additional information dated June 23, 2020
Incorporates	additional information dated August 26, 2020

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO ₂	Carbon Dioxide
CO _{2e}	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO _x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM ₁₀	Particulate matter less than 10 microns in size
PM _{2.5}	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO ₂	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds