



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

OCT 28 2013



HEALTHY AIR LIVING™

Mr. Wade Broughton
General Mills Operations, Inc.
2000 W Turner Road
Lodi, CA 95241-1906

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # N-355
Project # N-1094704**

Dear Mr. Broughton:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The proposed project is to include VOC emission limits for cereal flavor application operations, including cereal coating, drying, and conveying processes in permits N-355-1 and '-2.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

DW:JK/st

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadradin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprisa Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93728-0244
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

**San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review**

Facility Name:	General Mills Operations Inc.	Date:	October 17, 2013
Mailing Address:	2000 W Turner Road Lodi, CA 95241-1906	Engineer:	Jag Kahlon
Contact Person:	Wade Broughton	Lead Engineer:	Nick Peirce
Telephone:	(209) 334-7090		
Application #(s):	N-355-1-8, '-2-8		
Project #:	N-1094704		
Deemed Complete:	October 17, 2013		

I. PROPOSAL

General Mills Operations, Inc submitted a permit application to include VOC emission limits for cereal flavors application operations, including cereal coating, drying, and conveying processes in permits N-355-1 and '-2.

VOC emissions were originally disclosed in a confidential 1996 initial Title V package, and were never included in the permits. This facility has been using VOC-based flavorings for decades on various cereal products, in fact, production of one of the cereal products that uses VOC-based flavoring dates back to February 1969.

Upon reviewing recent records, it has been determined that it would be appropriate to establish a 30-day rolling average daily emissions rate of 147.9 lb-VOC/day and a 12-month rolling average annual emissions rate of 53,983 lb-VOC/yr, total for both permits N-355-1 and '-2. Note that either unit can operate at this level of emissions, independently, but, if so, the other line is producing non-VOC cereal. In addition, the maximum emissions rate for these two permits is set to the proposed 162.5 lb-VOC /day, which are below the maximum emissions, specified in General Mills' 1996 Title V application, 214 lb-VOC/day.

General Mills possesses a Title V permit. This project is a Minor Modification to the Title V permit per section 3.20 of Rule 2520. The applicant has requested to issue the Authority to Construct (ATC) with Certificate of Conformity (COC), which is EPA's 45-day review of the draft permits prior to the issuance of the final ATCs.

II. APPLICABLE RULES

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (11/26/12)
Rule 2520	Federally Mandated Operating Permits (6/21/01)

Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4202 Particulate Matter – Emission Rate (12/17/92)
California Health & Safety Code 41700 (Public Nuisance)
California Health & Safety Code 42301.6 (School Notice)
Public Resources Code 21000-21177: California Environmental Quality Act
(CEQA), California Code of Regulations, Title 14, Division 6, Chapter 3, Sections
15000- 15387: CEQA Guidelines

III. PROJECT LOCATION

This facility is located at 2000 W Turner Road, Lodi, California. This facility is not within 1,000 feet of the outer boundary of any K-12 school site. Therefore, public notice under the California Health and Safety Code 42301.6 is not required for this project.

IV. PROCESS DESCRIPTION

Cheerios, Lucky Charms, and Honey Nut Cheerios are regularly manufactured on Puff Line I and Puff Line II. These lines are very similar to each other in terms of product flow. Therefore, generic process description is as follows:

Raw materials such as flour, starch, sweetener etc. are dispensed pneumatically from bulk storage silos to day bins for each product. Depending on the cereal recipe, appropriate proportion of each material is dispensed from day bins to a mixer. The mixed materials are then cooked in steam-jacked cookers, passed through cereal-shape forming equipment, and partially dried in a steam-heated dryer(s). The dried-cooked product is conveyed to a screw conveyor using cyclonic receiver. The screw conveyor delivers the product to five electrically heated tumbler conveyors to uniformly dry or condition the product for further processing. These conveyors are common among both puff lines. Each conveyor delivers the product to its associated former that uses superheated steam to puff the cereal for further processing. Puffed cereal is then delivered to a receiver bin using cyclone associated with each former. Cereal is then delivered to a scalper to remove broken pieces, and then delivered to an enrober system where cereal flavor's sugar/syrup is applied. Coated cereal is then delivered to a steam-heated dryer(s) from where the product is delivered into the storage bins. Scalpers are used to remove the broken cereal before the product being transferred to the cereal packaging systems covered under permit unit N-355-5.

V. EQUIPMENT LISTING

Pre-Project Equipment Description:

N-355-1-10:

CEREAL PLANT (PUFF II) CONSISTING OF A MATERIAL DISPENSING SYSTEM, A MATERIAL COOKING SYSTEM, A PUFF SYSTEM, A CEREAL-FLAVOR SPRAYING AND DRYING SYSTEM, AND A FINISHED CEREAL SCALPING AND CONVEYANCE SYSTEM.

The following conditions were established as part of the equipment description in a previous permitting action:

- The material dispensing system shall consist of the following: flour dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 58CTBC18IIIG dust collector (AC-1); sweetener dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 10PBVBL9II dust collector (AC-3); multiple product dispensing into day bins served by a FABRIC FILTER CORP OR MAC MODEL 88AVRF0602 dust collector (AC-62); material dispensing from bin #57 to day bins served by a shared HAF EQUIPMENT MODEL 36CF14S3G dust collector (AC-77) (shared with permit unit N-355-2); dry sweetener dispensing operation from bulk storage silo to day bins served by a shared FLEX-KLEEN MODEL 58CTBC14IIIG dust collector (AC-78) (shared with permit unit N-355-2); day bins served by a AERODYNE MODEL 12104-4 dust collector (AC-5), mixer served by a AERODYNE MODEL 120060089 dust collector (AC-12); regrinds dispensing to a mixer served by a MAC MODEL 18BV4 dust collector (AC-79); wheat germ dispensing from bins to mixed-material product receiver served by a MAC MODEL 36AVR14-III dust collector (AC-45); and mixed-material product receiver served by a HAF EQUIPMENT MODEL 58CT3283 dust collector (AC-100). [District Rule 2201]
- The material cooking system shall consist of the following: transition hopper supplying mixed material to cookers served by a HAF EQUIPMENT MODEL 18BV4 dust collector (AC-102); steam-jacketed cookers, receiver, and steam-heated dryer served by a BOEDECKER DCP-30-196M168-38-G dust collector (AC-17); a product receiver (AC-23) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2); a cyclone receiver and dry dough handling system consists of a screw conveyor and five electrically-heated conveyors served by a shared AAF-ROTOCLONE MODEL W12 WET-TYPE dust collector (AC-26) (shared with permit unit N-355-2). [District Rule 2201]
- The puff system shall consist of the following: five permit-exempt natural gas-fired superheaters (0.5 MMBTU/HR each) serving five puff-formers; five post-puff-former cyclone receivers delivering product to a receiver on 4th floor which is

served by a KICE MODEL VR32-6H dust collector (AC-76) and scalper; a day bin (South) and, a conveyor (CNV 12), both served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2). [District Rule 2201]

- The cereal flavor spraying and drying system shall consist of the following: enrobers served by a DUCON MODEL UW3-21 WET-TYPE dust collector (AC-38); steam-heated dryer served by an AAF-ROTOCLONE W24 WET-TYPE dust collector (AC-37-1) and an AAF-ROTOCLONE WRC12 WET-TYPE dust collector (AC-37-2) on cooler side. [District Rule 2201]
- The finished cereal scalp and conveyance system shall consist of the following: finish cereal conveyors served by a shared FLEX-KLEEN MODEL 58WSBC81-III dust collector (AC-44) (shared with permit unit N-355-2); scalper served by a shared FLEX-KLEEN MODEL 58CTBC54-IIIIG dust collector (AC-68) (shared with permit unit N-355-2); scalper served by a BUHLER MODEL ASFA-44 dust collector (AC-43); material dispensing from dry minor ingredient bins to the cereal served by an AAF MODEL W840144 WET-TYPE dust collector (AC-75); a weight feeder (South) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2). [District Rule 2201]

N-355-2-12:

CEREAL PLANT (PUFF I) CONSISTING OF A MATERIAL DISPENSING SYSTEM, A MATERIAL COOKING SYSTEM, A PUFF SYSTEM, A CEREAL-FLAVOR SPRAYING AND DRYING SYSTEM, AND A FINISHED CEREAL SCALPING AND CONVEYANCE SYSTEM

The following conditions were established as part of the equipment description in a previous permitting action:

- The material dispensing system shall consist of the following: flour dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 36CTBC18-IIIIG dust collector (AC-60); flour scale aspirator served by a FLEX-KLEEN MODEL 36BVBC36-III-G dust collector (AC-61); material dispensing from bin #57 to day bins served by a shared HAF EQUIPMENT MODEL 36CF14S3G dust collector (AC-77) (shared with permit unit N-355-1); dry sweetener dispensing from bulk storage silo to day bins served by a shared FLEX KLEEN MODEL 58CTBC14IIIIG (AC-78) (shared with permit unit N-355-1) and FLEX-KLEEN MODEL 10PBVBL9II dust collectors (AC-2); wet dough fines dispensing operation served by a FLEX-KLEEN MODEL 58-CTBS-8-II dust collector (AC-64); day bins served by an AERODYNE MODEL 12104-4 dust collector (AC-4); mixer served by an AERODYNE MODEL 120060088 dust collector (AC-11); regrinds dispensing to a mixer served by a MAC MODEL 88-AVR-06-026 dust

- collector (AC-80); wheat germ dispensing from bins to mixed-material product receiver served by a MAC MODEL 36AVR14-III dust collector (AC-45); mixed-material product receiver served by a HAF EQUIPMENT MODEL 58CT3283 dust collector (AC-101). [District Rule 2201]
- The material cooking system shall consist of the following: transition hopper supplying mixed material to cookers served by a HAF EQUIPMENT MODEL 18BV4 dust collector (AC-103); steam-jacketed cookers, receiver and steam-heated dryer served by a BOEDECKER DCP-30-196M168-38-G dust collector (AC-15); a product receiver (AC-21) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1); a cyclone receiver and dry dough handling system consists of a screw conveyor and five electrically-heated conveyors served by a shared AAF-ROTOCLONE MODEL W12 WET-TYPE dust collector (AC-26) (shared with permit unit N-355-1). [District Rule 2201]
 - The puff system shall consist of the following: five permit-exempt natural gas-fired superheaters (0.5 MMBTU/HR each) serving five puff-formers; five post-former cyclone receivers delivering product to a scalper on 3rd floor; two day bins (Central and North) and a scalper conveyor all served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1). [District Rule 2201]
 - The cereal-flavor spraying and drying system shall consist of the following: enrobers served by a DUCON MODEL UW3-30 WET-TYPE dust collector (AC-42); steam-heated dryer served by an AAF-ROTOCLONE WRC16 1656297-5 WET-TYPE dust collector (AC-39-1) and an AAF-ROTOCLONE WRC24 1656297-7 WET-TYPE dust collector (AC-39-2) on cooler side; and steam-heated dryer served by an AAF-ROTOCLONE W33 WET-TYPE dust collector (AC-41). [District Rule 2201]
 - The finished cereal scalp and conveyance system shall consist of the following: finish cereal conveyors served by a shared FLEX-KLEEN MODEL 58WSBC81-III dust collector (AC-44) (shared with permit unit N-355-1); scalper served by a shared FLEX-KLEEN 58CTBC54-IIIIG dust collector (AC-68) (shared with permit unit N-355-1); two weight feeders (Central and North) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1). [District Rule 2201]

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

General Mills is not proposing any changes to existing emission control equipment, or installation of any additional control equipment. Therefore, no further discussion is necessary.

VII. EMISSION CALCULATIONS

VOC:

The existing VOC emissions from the cereal flavoring are incorporated in permits N-355-1 and '2. The applicant is not proposing any changes to these emissions; therefore, pre and post project potential emissions stay same.

PE1 = PE2
= 162.5 lb-VOC/day (maximum, both N-355-1 and '2)
= 147.9 lb-VOC/day (average, estimated using monthly records)
= 53,984 lb-VOC/yr

PM₁₀:

PE1 = PE2
= 26.7 lb-PM₁₀/day (N-355-1); 30.5 lb-PM₁₀/day (N-355-2)
= 9,745 lb-PM₁₀/yr (N-355-1); 11,133 lb-PM₁₀/yr (N-355-2)

VII. COMPLIANCE

Rule 2201 New and Modified Stationary Source Review Rule

Section 3.25 of Rule 2201 defines "Modification" as an action including at least one of the following items:

"Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions."

The proposed VOC emission limits do not result in any change in hours of operation, production rate, or method of operation of an emission unit which would necessitate a change in permit conditions.

"Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change."

Establishing VOC emission limits is not associated with any structural change or addition to an existing emissions unit.

"An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation"

There is no increase in VOC emissions due to the proposal project.

"Addition of any new emissions unit which is subject to District permitting requirements"

The proposed project does not involve addition of a new emission unit.

"A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject."

There are no local, state or federal rules that are subject to cereal manufacturing operations. The proposal to establish VOC emission limits is merely to incorporate the existing emissions.

Therefore, the proposed project is not subject to Rule 2201.

Rule 2410 Prevention of Significant Deterioration

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

Step1:

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not.

The equipment at this site is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
Category	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀	¹ CO ₂ e
Facility PE before Project	11.7	30.1	5.1	187.9	22.4	22.4	93,708
Major Source Thresholds?	250	250	250	250	250	250	100,000
PSD Major Source ?	No	No	No	No	No	No	No

From the above table, this facility is not an existing Major PSD source.

Step2:

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)							
Category	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀	CO ₂ e
Total PE from N-355-1-8 and '-2-8	0.0	27.0	0.0	0.0	10.4	10.4	0.0
PSD Major Source threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	No	No	No	No	No	No	No

¹CO₂e = [(116.8 lb-CO₂e/MMBtu NG combustion) x (16 MMBtu/hr for duct burner N-355-21-8 + 47.22 MMBtu/hr for gas turbine under N-355-21-8 + 5 MMBtu/hr for toasters under N-355-38-4) x (8,760 hr/yr) x (ton/2000 lb)] + [(139.1 lb-CO₂e/MMBtu LPG combustion) x (48.3 MMBtu/hr for boiler N-355-20-9 + 48.3 MMBtu/hr for boiler under permit N-355-95-3) x (8,760 hr/yr) x (ton/2000 lb)] + [(161.6 lb-CO₂e/MMBtu diesel fuel combustion) x (0.137 MMBtu/gal x 18.82 gal/hr) x 20 hr/yr for N-355-83-3 + 0.137 MMBtu/gal x 7.64 gal/hr x 100 hr/yr for N-355-99-0) x (ton/2,000 lb) = 34,841 tons-CO₂e/yr + 58,854 tons-CO₂e/yr + 13 tons-CO₂e/yr = 93,708 tons-CO₂e/yr

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore, Rule 2410 is not applicable and no further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is a Major Source for NO_x, CO and VOC emissions, and is operating under Title V permit. Therefore, this facility is subject to the requirements in this rule.

The proposed project is a Minor Modification to the Title V permit per section 3.20 of this rule. The applicant has requested to issue the ATCs with COC. Therefore, the following conditions will be included in each permit:

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule]
- Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs and
- The source's suggested draft permit (Appendix I of this document) and
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix II of this document).

Section 5.3.4 of this rule requires the permittee shall file an application for administrative permit amendments prior to implementing the requested change except when allowed by the operational flexibility provisions of section 6.4 of this rule. The applicant is expected to notify the District by filing TV Form-008 upon implementing the ATCs. The District Compliance Division is expected to submit a change order to implement these ATCs into PTOs.

Compliance is expected with this Rule.

Rule 4101 Visible Emissions

Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringelmann 1 or equivalent to 20% opacity. The following condition will be included in the permit:

- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Compliance is expected with this Rule.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. The following condition will be placed on each permit:

- No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 - Health Risk Assessment

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

The proposed project does not result in an increase in VOC emissions. Therefore, risk management review analysis is not required.

Compliance is expected with this Rule.

Rule 4201 Particulate Matter Concentration
Rule 4202 Particulate Matter – Emission Rate

The proposed project does not result in an increase in PM emissions; therefore, continued compliance is expected.

California Environmental Quality Act Requirements (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental

documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project qualifies for ministerial approval as the existing VOC emissions are being established in the permit. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is project is exempt from the provisions of CEQA.

IX. RECOMMENDATION

Compliance with all applicable regulations is expected. Therefore, issuance of the permits is recommended.

X. BILLING INFORMATION

Permit #	Fee Schedule	Fee Description	Previous Fee Schedule
N-355-1-8	3020-01 G	803 hp	3020-01 G
N-355-2-8	3020-01 F	539.8 hp	3020-01 F

APPENDICES

- Appendix I: Draft ATC Permits
Appendix II: Compliance Certification Form
Appendix III: Current Permits to Operate

Appendix I
Draft ATC Permits

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-355-1-8

LEGAL OWNER OR OPERATOR: GENERAL MILLS OPERATIONS, INC
MAILING ADDRESS: ATTN: ACCOUNTS PAYABLE
PO BOX 1263
MINNEAPOLIS, MN 55440

LOCATION: WADE BROUGHTON
2000 W TURNER ROAD
LODI, CA 95242

EQUIPMENT DESCRIPTION:

MODIFICATION OF CEREAL PLANT (PUFF II) CONSISTING OF A MATERIAL DISPENSING SYSTEM, A MATERIAL COOKING SYSTEM, A PUFF SYSTEM, A CEREAL-FLAVOR SPRAYING AND DRYING SYSTEM, AND A FINISHED CEREAL SCALPING AND CONVEYANCE SYSTEM: TO INCLUDE VOC EMISSION LIMITS FROM CEREAL FLAVORINGS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grain/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Visible emissions from the exhaust of each dust collector (wet or dry) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

N-355-1-8 : Oct 17 2013 1:23PM - KAYLORU : Joint Inspection NOT Required

5. The material dispensing system shall consist of the following: flour dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 58CTBC18IIIG dust collector (AC-1); sweetener dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 10PBVBL9II dust collector (AC-3); multiple product dispensing into day bins served by a FABRIC FILTER CORP OR MAC MODEL 88AVRF0602 dust collector (AC-62); material dispensing from bin #57 to day bins served by a shared HAF EQUIPMENT MODEL 36CF14S3G dust collector (AC-77) (shared with permit unit N-355-2); dry sweetener dispensing operation from bulk storage silo to day bins served by a shared FLEX-KLEEN MODEL 58CTBC14IIIG dust collector (AC-78) (shared with permit unit N-355-2); day bins served by a AERODYNE MODEL 12104-4 dust collector (AC-5), mixer served by a AERODYNE MODEL 120060089 dust collector (AC-12); regrinds dispensing to a mixer served by a MAC MODEL 18BV4 dust collector (AC-79); wheat germ dispensing from bins to mixed-material product receiver served by a MAC MODEL 36AVR14-III dust collector (AC-45); and mixed-material product receiver served by a HAF EQUIPMENT MODEL 58CT3283 dust collector (AC-100). [District Rule 2201] Federally Enforceable Through Title V Permit
6. The material cooking system shall consist of the following: transition hopper supplying mixed material to cookers served by a HAF EQUIPMENT MODEL 18BV4 dust collector (AC-102); steam-jacketed cookers, receiver, and steam-heated dryer served by a BOEDECKER DCP-30-196M168-38-G dust collector (AC-17); a product receiver (AC-23) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2); a cyclone receiver and dry dough handling system consists of a screw conveyor and five electrically-heated conveyors served by a shared AAF-ROTOCLONE MODEL W12 WET-TYPE dust collector (AC-26) (shared with permit unit N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
7. The puff system shall consist of the following: five permit-exempt natural gas-fired superheaters (0.5 MMBTU/HR each) serving five puff-formers; five post-puff-former cyclone receivers delivering product to a receiver on 4th floor which is served by a KICE MODEL VR32-6H dust collector (AC-76) and scalper; a day bin (South) and, a conveyor (CNV 12), both served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The cereal flavor spraying and drying system shall consist of the following: enrobbers served by a DUCON MODEL UW3-21 WET-TYPE dust collector (AC-38); steam-heated dryer served by an AAF-ROTOCLONE W24 WET-TYPE dust collector (AC-37-1) and an AAF-ROTOCLONE WRC12 WET-TYPE dust collector (AC-37-2) on cooler side. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The finished cereal scalp and conveyance system shall consist of the following: finish cereal conveyors served by a shared FLEX-KLEEN MODEL 58WSBC81-III dust collector (AC-44) (shared with permit unit N-355-2); scalper served by a shared FLEX-KLEEN MODEL 58CTBC54-IIIG dust collector (AC-68) (shared with permit unit N-355-2); scalper served by a BUHLER MODEL ASFA-44 dust collector (AC-43); material dispensing from dry minor ingredient bins to the cereal served by an AAF MODEL W840144 WET-TYPE dust collector (AC-75); a weight feeder (South) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The total VOC emissions (uncontrolled) from cereal coating, drying and conveying (fugitive) operations covered under both permits N-355-1 and N-355-2 shall not exceed 162.5 pounds in any one day. [District Rule 2070] Federally Enforceable Through Title V Permit
11. The total VOC emissions (uncontrolled) from cereal coating, drying and conveying (fugitive) operations covered under both permits N-355-1 and N-355-2 shall not exceed any of the following limits: 147.9 lb/day on a 30-day rolling period and 53,984 lb/year on a 12-month rolling period. [District Rule 2070] Federally Enforceable Through Title V Permit
12. PM10 emissions from this permit unit shall not exceed 26.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

13. The operator shall maintain the following water flow rates: a.) at least 1.0 gpm for AAF-Rotoclone Model W12 dust collector (AC-26), b.) at least 0.7 gpm for Ducon Model UW3-21 dust collector (AC-38), c.) at least 3.5 gpm for AAF-Rotoclone Model W24 dust collector (AC-37-1), d.) at least 1.0 gpm for AAF-Rotoclone Model WRC12 dust collector (AC-37-2), e.) at least 1.5 gpm for AAF Model W840144 dust collector (AC-75), and f.) at least 3.5 gpm for the American Air Filter Rotoclone Model B Arrangement A Type W Size 20 WET-TYPE dust collector (AC-106, shared with N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
14. Material removed from each dust collector (wet or dry) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The cleaning frequency and duration of each dust collector (wet or dry) shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Replacement bags numbering at least 10% of the total number of bags in the largest dust collector (dry), and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Visible emissions from cyclones and dust collectors (wet or dry) that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Cyclones and dust collectors (wet or dry) shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Dust collector (dry) filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Records of cyclones and dust collectors (wet or dry) maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour (amended December 17, 1992). [District Rule 4202] Federally Enforceable Through Title V Permit
22. Water flow rate of each dust collector (wet) shall be monitored and recorded quarterly during operation of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-355-2-8

LEGAL OWNER OR OPERATOR: GENERAL MILLS OPERATIONS, INC
MAILING ADDRESS: ATTN: ACCOUNTS PAYABLE
PO BOX 1263
MINNEAPOLIS, MN 55440

LOCATION: WADE BROUGHTON
2000 W TURNER ROAD
LODI, CA 95242

EQUIPMENT DESCRIPTION:

MODIFICATION OF CEREAL PLANT (PUFF I) CONSISTING OF A MATERIAL DISPENSING SYSTEM, A MATERIAL COOKING SYSTEM, A PUFF SYSTEM, A CEREAL-FLAVOR SPRAYING AND DRYING SYSTEM, AND A FINISHED CEREAL SCALPING AND CONVEYANCE SYSTEM: TO INCLUDE VOC EMISSION LIMITS FROM CEREAL FLAVORINGS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grain/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Visible emissions from the exhaust of each dust collector (wet or dry) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services

N-355-2-8 Oct 17 2013 1:23PM - KAH, OAU Joint Inspection NOT Required

5. The material dispensing system shall consist of the following: flour dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 36CTBC18-III-G dust collector (AC-60); flour scale aspirator served by a FLEX-KLEEN MODEL 36BVBC36-III-G dust collector (AC-61); material dispensing from bin #57 to day bins served by a shared HAF EQUIPMENT MODEL 36CFI4S3G dust collector (AC-77) (shared with permit unit N-355-1); dry sweetener dispensing from bulk storage silo to day bins served by a shared FLEX KLEEN MODEL 58CTBC14IIIG (AC-78) (shared with permit unit N-355-1) and FLEX-KLEEN MODEL 10PBVBL9II dust collectors (AC-2); wet dough fines dispensing operation served by a FLEX-KLEEN MODEL 58-CTBS-8-II dust collector (AC-64); day bins served by an AERODYNE MODEL 12104-4 dust collector (AC-4); mixer served by an AERODYNE MODEL 120060088 dust collector (AC-11); regrinds dispensing to a mixer served by a MAC MODEL 88-AVR-06-026 dust collector (AC-80); wheat germ dispensing from bins to mixed-material product receiver served by a MAC MODEL 36AVR14-III dust collector (AC-45); mixed-material product receiver served by a HAF EQUIPMENT MODEL 58CT3283 dust collector (AC-101). [District Rule 2201] Federally Enforceable Through Title V Permit
6. The material cooking system shall consist of the following: transition hopper supplying mixed material to cookers served by a HAF EQUIPMENT MODEL 18BV4 dust collector (AC-103); steam-jacketed cookers, receiver and steam-heated dryer served by a BOEDECKER DCP-30-196M168-38-G dust collector (AC-15); a product receiver (AC-21) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1); a cyclone receiver and dry dough handling system consists of a screw conveyor and five electrically-heated conveyors served by a shared AAF-ROTOCLONE MODEL W12 WET-TYPE dust collector (AC-26) (shared with permit unit N-355-1). [District Rule 2201] Federally Enforceable Through Title V Permit
7. The puff system shall consist of the following: five permit-exempt natural gas-fired superheaters (0.5 MMBTU/HR each) serving five puff-formers; five post-former cyclone receivers delivering product to a scalper on 3rd floor; two day bins (Central and North) and a scalper conveyor all served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The cereal-flavor spraying and drying system shall consist of the following: enrobers served by a DUCON MODEL UW3-30 WET-TYPE dust collector (AC-42); steam-heated dryer served by an AAF-ROTOCLONE WRC16 1656297-5 WET-TYPE dust collector (AC-39-1) and an AAF-ROTOCLONE WRC24 1656297-7 WET-TYPE dust collector (AC-39-2) on cooler side; and steam-heated dryer served by an AAF-ROTOCLONE W33 WET-TYPE dust collector (AC-41). [District Rule 2201] Federally Enforceable Through Title V Permit
9. The finished cereal scalp and conveyance system shall consist of the following: finish cereal conveyors served by a shared FLEX-KLEEN MODEL 58WSBC81-III dust collector (AC-44) (shared with permit unit N-355-1); scalper served by a shared FLEX-KLEEN 58CTBC54-IIIG dust collector (AC-68) (shared with permit unit N-355-1); two weight feeders (Central and North) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The total VOC emissions (uncontrolled) from cereal coating, drying and conveying (fugitive) operations covered under both permits N-355-1 and N-355-2 shall not exceed 162.5 pounds in any one day. [District Rule 2070] Federally Enforceable Through Title V Permit
11. The total VOC emissions (uncontrolled) from cereal coating, drying and conveying (fugitive) operations covered under both permits N-355-1 and N-355-2 shall not exceed any of the following limits: 147.9 lb/day on a 30-day rolling period and 53,984 lb/year on a 12-month rolling period. [District Rule 2070] Federally Enforceable Through Title V Permit
12. PM10 emissions from this permit unit shall not exceed 30.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall maintain the following water flow rates: a.) at least 1.0 gpm for AAF-Rotoclone Model W12 dust collector (AC-26), b.) at least 1.8 gpm for Ducon Model UW3-30 dust collector (AC-42), c.) at least 2.0 gpm for AAF-Rotoclone Model WRC16 1656297-5 dust collector (AC-39-1), d.) at least 3.5 gpm for AAF-Rotoclone Model WRC24 1656297-7 dust collector (AC-39-2), e.) at least 4.0 gpm for AAF Model W33 dust collector (AC-41), and f.) at least 3.5 gpm for the American Air Filter Rotoclone Model B Arrangement A Type W Size 20 WET-TYPE dust collector (AC-106, shared with N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

14. Material removed from each dust collector (wet or dry) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The cleaning frequency and duration of each dust collector (wet or dry) shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Replacement bags numbering at least 10% of the total number of bags in the largest dust collector (dry), and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Visible emissions from cyclones and dust collectors (wet or dry) that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Cyclones and dust collectors (wet or dry) shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Dust collector (dry) filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The baghouses shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The differential pressure, as indicated by the pressure differential gauge associated with each baghouse, shall stay within the operating range of 0.1 to 8 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Records of all maintenance of the baghouses, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Records of cyclones and dust collectors (wet or dry) maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour (amended December 17, 1992). [District Rule 4202] Federally Enforceable Through Title V Permit
26. Water flow rate of each dust collector (wet) shall be monitored and recorded quarterly during operation of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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Appendix II
Compliance Certification Form

.

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: General Mills Operations	FACILITY ID: N - 355
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: General Mills Operations, Inc.	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:


 Signature of Responsible Official

October 9, 2013
 Date

Jason Schierling
 Name of Responsible Official (please print)
Plant Manager
 Title of Responsible Official (please print)

Appendix III
Current Permits to Operate

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-355-1-10

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

CEREAL PLANT (PUFF II) CONSISTING OF A MATERIAL DISPENSING SYSTEM, A MATERIAL COOKING SYSTEM, A PUFF SYSTEM, A CEREAL-FLAVOR SPRAYING AND DRYING SYSTEM, AND A FINISHED CEREAL SCALPING AND CONVEYANCE SYSTEM.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grain/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of each dust collector (wet or dry) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The material dispensing system shall consist of the following: flour dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 58CTBC18IIIG dust collector (AC-1); sweetener dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 10PBVBL9II dust collector (AC-3); multiple product dispensing into day bins served by a FABRIC FILTER CORP OR MAC MODEL 88AVRF0602 dust collector (AC-62); material dispensing from bin #57 to day bins served by a shared HAF EQUIPMENT MODEL 36CF14S3G dust collector (AC-77) (shared with permit unit N-355-2); dry sweetener dispensing operation from bulk storage silo to day bins served by a shared FLEX-KLEEN MODEL 58CTBC14IIIG dust collector (AC-78) (shared with permit unit N-355-2); day bins served by a AERODYNE MODEL 12104-4 dust collector (AC-5), mixer served by a AERODYNE MODEL 120060089 dust collector (AC-12); regrinds dispensing to a mixer served by a MAC MODEL 18BV4 dust collector (AC-79); wheat germ dispensing from bins to mixed-material product receiver served by a MAC MODEL 36AVR14-III dust collector (AC-45); and mixed-material product receiver served by a HAF EQUIPMENT MODEL 58CT3283 dust collector (AC-100). [District Rule 2201] Federally Enforceable Through Title V Permit
4. The material cooking system shall consist of the following: transition hopper supplying mixed material to cookers served by a HAF EQUIPMENT MODEL 18BV4 dust collector (AC-102); steam-jacketed cookers, receiver, and steam-heated dryer served by a BOEDECKER DCP-30-196M168-38-G dust collector (AC-17); a product receiver (AC-23) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2); a cyclone receiver and dry dough handling system consists of a screw conveyor and five electrically-heated conveyors served by a shared AAF-ROTOCLONE MODEL W12 WET-TYPE dust collector (AC-26) (shared with permit unit N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
5. The puff system shall consist of the following: five permit-exempt natural gas-fired superheaters (0.5 MMBTU/HR each) serving five puff-formers; five post-puff-former cyclone receivers delivering product to a receiver on 4th floor which is served by a KICE MODEL VR32-6H dust collector (AC-76) and scalper; a day bin (South) and, a conveyor (CNV 12), both served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE.

These terms and conditions are part of the Facility-wide Permit to Operate.

6. The cereal flavor spraying and drying system shall consist of the following: enrobers served by a DUCON MODEL UW3-21 WET-TYPE dust collector (AC-38); steam-heated dryer served by an AAF-ROTOCLONE W24 WET-TYPE dust collector (AC-37-1) and an AAF-ROTOCLONE WRC12 WET-TYPE dust collector (AC-37-2) on cooler side. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The finished cereal scalp and conveyance system shall consist of the following: finish cereal conveyors served by a shared FLEX-KLEEN MODEL 58WSBC81-III dust collector (AC-44) (shared with permit unit N-355-2); scalper served by a shared FLEX-KLEEN MODEL 58CTBC54-IIIG dust collector (AC-68) (shared with permit unit N-355-2); scalper served by a BUHLER MODEL ASFA-44 dust collector (AC-43); material dispensing from dry minor ingredient bins to the cereal served by an AAF MODEL W840144 WET-TYPE dust collector (AC-75); a weight feeder (South) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from this permit unit shall not exceed 26.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The operator shall maintain the following water flow rates: a.) at least 1.0 gpm for AAF-Rotoclone Model W12 dust collector (AC-26), b.) at least 0.7 gpm for Ducon Model UW3-21 dust collector (AC-38), c.) at least 3.5 gpm for AAF-Rotoclone Model W24 dust collector (AC-37-1), d.) at least 1.0 gpm for AAF-Rotoclone Model WRC12 dust collector (AC-37-2), e.) at least 1.5 gpm for AAF Model W840144 dust collector (AC-75), and f.) at least 3.5 gpm for the American Air Filter Rotoclone Model B Arrangement A Type W Size 20 WET-TYPE dust collector (AC-106, shared with N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
10. Material removed from each dust collector (wet or dry) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The cleaning frequency and duration of each dust collector (wet or dry) shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Replacement bags numbering at least 10% of the total number of bags in the largest dust collector (dry), and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Visible emissions from cyclones and dust collectors (wet or dry) that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Cyclones and dust collectors (wet or dry) shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Dust collector (dry) filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of cyclones and dust collectors (wet or dry) maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour (amended December 17, 1992). [District Rule 4202] Federally Enforceable Through Title V Permit
18. Water flow rate of each dust collector (wet) shall be monitored and recorded quarterly during operation of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

20. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-355-2-12

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

CEREAL PLANT (PUFF I) CONSISTING OF A MATERIAL DISPENSING SYSTEM, A MATERIAL COOKING SYSTEM, A PUFF SYSTEM, A CEREAL-FLAVOR SPRAYING AND DRYING SYSTEM, AND A FINISHED CEREAL SCALPING AND CONVEYANCE SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grain/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of each dust collector (wet or dry) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
3. The material dispensing system shall consist of the following: flour dispensing from bulk storage silo to day bins served by a FLEX-KLEEN MODEL 36CTBC18-IIIG dust collector (AC-60); flour scale aspirator served by a FLEX-KLEEN MODEL 36BVBC36-III-G dust collector (AC-61); material dispensing from bin #57 to day bins served by a shared HAF EQUIPMENT MODEL 36CF14S3G dust collector (AC-77) (shared with permit unit N-355-1); dry sweetener dispensing from bulk storage silo to day bins served by a shared FLEX KLEEN MODEL 58CTBC14IIIG (AC-78) (shared with permit unit N-355-1) and FLEX-KLEEN MODEL 10PBVBL9II dust collectors (AC-2); wet dough fines dispensing operation served by a FLEX-KLEEN MODEL 58-CTBS-8-II dust collector (AC-64); day bins served by an AERODYNE MODEL 12104-4 dust collector (AC-4); mixer served by an AERODYNE MODEL 120060088 dust collector (AC-11); regrinds dispensing to a mixer served by a MAC MODEL 88-AVR-06-026 dust collector (AC-80); wheat germ dispensing from bins to mixed-material product receiver served by a MAC MODEL 36AVR14-III dust collector (AC-45); mixed-material product receiver served by a HAF EQUIPMENT MODEL 58CT3283 dust collector (AC-101). [District Rule 2201] Federally Enforceable Through Title V Permit
4. The material cooking system shall consist of the following: transition hopper supplying mixed material to cookers served by a HAF EQUIPMENT MODEL 18BV4 dust collector (AC-103); steam-jacketed cookers, receiver and steam-heated dryer served by a BOEDECKER DCP-30-196M168-38-G dust collector (AC-15); a product receiver (AC-21) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1); a cyclone receiver and dry dough handling system consists of a screw conveyor and five electrically-heated conveyors served by a shared AAF-ROTOCLONE MODEL W12 WET-TYPE dust collector (AC-26) (shared with permit unit N-355-1). [District Rule 2201] Federally Enforceable Through Title V Permit
5. The puff system shall consist of the following: five permit-exempt natural gas-fired superheaters (0.5 MMBTU/HR each) serving five puff-formers; five post-former cyclone receivers delivering product to a scalper on 3rd floor; two day bins (Central and North) and a scalper conveyor all served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1). [District Rule 2201] Federally Enforceable Through Title V Permit

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6. The cereal-flavor spraying and drying system shall consist of the following: enrobers served by a DUCON MODEL UW3-30 WET-TYPE dust collector (AC-42); steam-heated dryer served by an AAF-ROTOCLONE WRC16 1656297-5 WET-TYPE dust collector (AC-39-1) and an AAF-ROTOCLONE WRC24 1656297-7 WET-TYPE dust collector (AC-39-2) on cooler side; and steam-heated dryer served by an AAF-ROTOCLONE W33 WET-TYPE dust collector (AC-41). [District Rule 2201] Federally Enforceable Through Title V Permit
7. The finished cereal scalp and conveyance system shall consist of the following: finish cereal conveyors served by a shared FLEX-KLEEN MODEL 58WSBC81-III dust collector (AC-44) (shared with permit unit N-355-1); scalper served by a shared FLEX-KLEEN 58CTBC54-IIIG dust collector (AC-68) (shared with permit unit N-355-1); two weight feeders (Central and North) served by an American Air Filter Rotoclone Model B Arrangement A Type W Size 20 Wet-Type dust collector (AC-106, shared with other emission units listed in this permit and permit N-355-1). [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from this permit unit shall not exceed 30.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The operator shall maintain the following water flow rates: a.) at least 1.0 gpm for AAF-Rotoclone Model W12 dust collector (AC-26), b.) at least 1.8 gpm for Ducon Model UW3-30 dust collector (AC-42), c.) at least 2.0 gpm for AAF-Rotoclone Model WRC16 1656297-5 dust collector (AC-39-1), d.) at least 3.5 gpm for AAF-Rotoclone Model WRC24 1656297-7 dust collector (AC-39-2), e.) at least 4.0 gpm for AAF Model W33 dust collector (AC-41), and f.) at least 3.5 gpm for the American Air Filter Rotoclone Model B Arrangement A Type W Size 20 WET-TYPE dust collector (AC-106, shared with N-355-2). [District Rule 2201] Federally Enforceable Through Title V Permit
10. Material removed from each dust collector (wet or dry) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The cleaning frequency and duration of each dust collector (wet or dry) shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Replacement bags numbering at least 10% of the total number of bags in the largest dust collector (dry), and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Visible emissions from cyclones and dust collectors (wet or dry) that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Cyclones and dust collectors (wet or dry) shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Dust collector (dry) filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The baghouses shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The differential pressure, as indicated by the pressure differential gauge associated with each baghouse, shall stay within the operating range of 0.1 to 8 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Records of all maintenance of the baghouses, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Records of cyclones and dust collectors (wet or dry) maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit

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21. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour (amended December 17, 1992). [District Rule 4202] Federally Enforceable Through Title V Permit
22. Water flow rate of each dust collector (wet) shall be monitored and recorded quarterly during operation of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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