



AIR QUALITY
MANAGEMENT DISTRICT

**TITLE V FEDERAL OPERATING PERMIT
AND
SMAQMD RULE 201 PERMITS TO OPERATE**

**TITLE V PERMIT NO:
TV2011-03-01**

**PERMIT
ISSUED:**
April 19, 2011

**PERMIT
LAST AMENDED:**
N/A

**PERMIT
EXPIRES:**
April 19, 2016

ISSUED TO:
Campbell Soup Supply Company, LLC
6200 Franklin Boulevard
Sacramento, CA 95824

FACILITY LOCATION:
Campbell Soup Supply Company, LLC
6200 Franklin Boulevard
Sacramento, CA

RESPONSIBLE OFFICIAL:
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Sacramento Operations
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CONTACT PERSON:
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NATURE OF BUSINESS:
Processing and Canning of
Various Foods and Juices

**STANDARD INDUSTRIAL
CLASSIFICATION (SIC):**
2032

Larry Greene
SMAQMD Air Pollution Control Officer

by: _____
Michelle Joe
Air Quality Engineer

TABLE OF CONTENTS

	Page
PERMIT SUMMARY	4
FACILITY DESCRIPTION	6
FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL	
Title V Permit Modifications And Renewal.....	8
Compliance	9
Reports and Recordkeeping	10
Ringelmann Chart	12
Particulate Matter	12
Sulfur Compounds	13
Architectural Coating.....	13
Equipment Breakdowns	14
Payment of Fees	15
Clean Air Act Fees	15
Emission Statements	15
Accidental Releases	15
Title VI Requirements (Ozone Depleting Substances).....	16
NON-FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL	
Applicability	17
SMAQMD Rule 201 Permit Renewal.....	17
General.....	17
Equipment Operation	17
Equipment Breakdowns.....	18
Architectural Coatings.....	20
FEDERALLY ENFORCEABLE REQUIREMENTS - EQUIPMENT SPECIFIC	
▶ Boilers Nos. 1, 2, 3 and 4 [SMAQMD Rule 201 Permit Nos. 20160, 20161, 20936, 20937]	21
▶ Dry Ingredient Handling Air Pollution Control System No. 1 [SMAQMD Rule 201 Permit No. 16888].....	31
▶ Dry Ingredient Handling Air Pollution Control System No. 2 [SMAQMD Rule 201 Permit No. 17180].....	31
▶ Dry Ingredient Handling Air Pollution Control System No. 3 [SMAQMD Rule 201 Permit No. 18710].....	31
▶ Internal Combustion Engine - Emergency Use [SMAQMD Rule 201 Permit No. 14634].....	34

TABLE OF CONTENTS (continued)

	Page
FEDERALLY ENFORCEABLE REQUIREMENTS - EQUIPMENT SPECIFIC (continued)	
▶ Internal Combustion Engine - Emergency Use [SMAQMD Rule 201 Permit No. 21074].....	34
▶ Inkjet Printing Operations [SMAQMD Rule 201 Permit No. 22542].....	40
INSIGNIFICANT EMISSION UNITS	43
ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE	45

DRAFT

PERMIT SUMMARY

This permit shall serve as a conditional Permit to Operate pursuant to SMAQMD Rule 201 (General Permit Requirements) and SMAQMD Rule 207 (Title V - Federal Operating Permit Program). Requirements identified in the permit as non-federally enforceable are not enforceable by U.S. EPA. However, they are enforceable by the Sacramento Metropolitan Air Quality Management District (SMAQMD)

Your application for this air quality Permit to Operate was evaluated for compliance with SMAQMD, State and Federal air quality rules and regulations. The following listed rules are those that were found to be applicable at the time of permit review, based on the information submitted with the Title V permit application.

Citation	Description	Rule Adoption Date	Federally Enforceable
SMAQMD Rule 101	General Provisions and Definitions	09-03-1998	Yes
SMAQMD Rule 102	Circumvention	11-29-1983	Yes
SMAQMD Rule 108	Minor Violation	10-01-1998	No
SMAQMD Rule 201	General Permit Requirements (SIP approved)	11-20-1984	Yes
SMAQMD Rule 201	General Permit Requirements (not SIP approved)	08-24-2006	No
SMAQMD Rule 202	New Source Review (SIP approved)	11-20-1984	Yes
SMAQMD Rule 202	New Source Review (not SIP approved)	02-24-2005	No
SMAQMD Rule 207	Title V - Federal Operating Permit Program (not SIP approved but rule is applicable as part of U.S. EPA approval of the SMAQMD Title V program)	04-26-2001	Yes
SMAQMD Rule 301	Permit Fees - Stationary Source (not SIP approved but Title V fees in rule applicable as part of U.S. EPA approval of the SMAQMD Title V program)	08-01-2008	Yes (Title V provisions only)
SMAQMD Rule 307	Clean Air Act Fees	09-26-2002	Yes
SMAQMD Rule 401	Ringelmann Chart	04-05-1983	Yes
SMAQMD Rule 402	Nuisance	08-03-1977	No
SMAQMD Rule 403	Fugitive Dust	11-29-1983	Yes

PERMIT SUMMARY

Citation	Description	Rule Adoption Date	Federally Enforceable
SMAQMD Rule 404	Particulate Matter	11-20-1984	Yes
SMAQMD Rule 405	Dust and Condensed Fumes	11-29-1983	Yes
SMAQMD Rule 406	Specific Contaminants	11-29-1983	Yes
SMAQMD Rule 407	Open Burning	11-29-1983	Yes
SMAQMD Rule 411	NOx from Boilers, Process Heaters and Steam Generators	08-23-2007	Yes
SMAQMD Rule 412	Stationary Internal Combustion Engines Located at Major Stationary Sources of NOx	06-01-1995	Yes
SMAQMD Rule 414	Natural Gas Fired Water Heaters (SIP approved)	08-01-1996	Yes
SMAQMD Rule 414	Natural Gas Fired Water Heaters (not SIP approved)	03-25-2010	No
SMAQMD Rule 420	Sulfur Content of Fuels	11-29-1983	Yes
SMAQMD Rule 442	Architectural Coatings (SIP approved)	09-05-1996	Yes
SMAQMD Rule 442	Architectural Coatings (not SIP approved)	05-24-2001	No
SMAQMD Rule 451	Surface Coating of Miscellaneous Metal Parts and Products (SIP approved)	11-29-1983	Yes
SMAQMD Rule 451	Surface Coating of Miscellaneous Metal Parts and Products (not SIP approved)	10-28-2010	No
SMAQMD Rule 601	Procedure before the Hearing Board	02-05-1998	No
SMAQMD Rule 602	Breakdown Conditions: Emergency Variance (not SIP approved)	12-06-1978	No
SMAQMD Rule 801	New Source Performance Standards (not SIP approved)	03-27-2008	No

PERMIT SUMMARY

Citation	Description	Rule Adoption Date	Federally Enforceable
U.S. EPA New Source Performance Standards (NSPS)	NSPS for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60 Subpart IIII (begin at 60.4200)	07-11-2006 (A)	Yes
U.S. EPA National Emission Standards for Hazardous Air Pollutants (NESHAP)	NESHAP for Reciprocating Internal Combustion Engines 40 CFR 63 Subpart ZZZZ (begin at 63.6580)	08-20-2010 (A)	Yes
U.S. EPA 40 CFR 82 Subpart F (begin at 82.150)	Protection of Stratospheric Ozone - Recycling and Emissions Reduction 40 CFR 82 Subpart F (begin at 82.150)	04-13-2005 (A)	Yes
U.S. EPA 40 CFR 68 (begin at 68.1)	Chemical Accident Prevention Provisions 40 CFR 68 (begin at 68.1)	04-09-2004 (A)	Yes

(A) Most recent U.S. EPA promulgation date.

Future changes in prohibitory rules may establish more stringent requirements that may, at the SMAQMD level, supersede the conditions listed here. For Title V purposes however, the federally enforceable requirements are those found in the Title V permit. Federally enforceable provisions of the Title V permit do not change until the Title V permit is revised.

FACILITY DESCRIPTION

Permit Background

<u>Permit Action</u>	<u>Date Issued</u>	<u>Federal Title V Operating Permit No.</u>
Initial permit issued:	04-19-2001	TV1996-03-01
1st Administrative Amendment	11-21-2002	TV1996-03-01A
1st Minor Modification	03-18-2003	TV1996-03-02
2nd Administrative Amendment	05-13-2003	TV1996-03-02A
1st Permit Renewal	04-19-2006	TV2005-03-01
1st Significant Modification	06-08-2007	TV2005-03-02
1st Administrative Amendment	07-31-2008	TV2005-03-02A

Current Permitting Action

This permit action is the second renewal and the first Administrative Amendment of Title V Federal Operating Permit, TV2005-03-02A.

This permit will be assigned the permit number TV2011-03-01.

Facility Description

Prior to June 1998 Campbell Soup Company conducted two distinct operations at this facility.

- Manufacturing of 2-piece and 3-piece cans for food product packaging.
- Processing of canned foods and juices including tomato juices, tomato sauces and soups.

In June 1998 Campbell Soup Company sold the can manufacturing process to Silgan Can Company who continues the operation of the can manufacturing process at the same location. Campbell Soup Company then created a subsidiary named Campbell Soup Supply Company, LLC and assigned the canned food and juice processing to this new company.

Food Processing and Packaging:

The primary objective of food processing is the preservation of perishable foods in a stable form that can be stored and shipped to markets during all months of the year. Processing also can change foods into new or more usable forms and make foods convenient to prepare.

The canning operation employs the following general processes: washing, sorting/grading, chopping, slicing, grinding, container filling, container sealing, heat sterilization, cooling, labeling/casing, and storage for shipment. None of these activities result in significant emissions.

FACILITY DESCRIPTION

The principal preparation steps are washing and sorting. Raw ingredients are usually thoroughly washed by high-pressure sprays or by strong-flowing streams of water while being passed along a moving belt or an agitating or revolving screen. Ingredient preparation is done through sorting into groups (by hand) according to degree of ripeness or perfection of shape. Trimming is also done by hand.

After preparation, the raw ingredients are transported to the point of filling. Before being filled, the can is cleaned. The containers are filled with the product by the machines. After filling, the cans are sealed by interlocking the curl of the lid and flange of the can, creating a double seal. Closing machines are equipped to create vacuum in the headspace either mechanically or by steam-flow before lids are sealed (except for aluminum cans which use pressurized nitrogen to create a positive pressure before sealing).

During processing, microorganisms that can cause spoilage are destroyed by heat. The temperature and processing time vary with the nature of the product and the size of the container. After heat sterilization, containers are quickly cooled to prevent overcooking. Containers may be cooled by conveying the containers from the cooker to a rotary cooler, hydrostatic cooler, or conveyor equipped with a cold-water spray.

The steam for food processing and sterilization can be produced by four (4) natural gas fired boilers located onsite. The boilers have special equipment and special natural gas burners to reduce the air emissions of nitrogen oxides (NO_x) and carbon monoxide (CO). However, under normal operation, steam is imported from a cogeneration facility located at the southwest corner of the Campbell Soup property line. The cogeneration facility is owned by the Sacramento Power Authority (subsidiary of SMUD). The steam is routed through steam lines to the facility areas where it is required.

Ingredient handling equipment is used to convey food preparation materials from storage to the processing area. The materials are handled pneumatically and air pollution control equipment is used to reduce the air emission of particulate matter (PM₁₀).

Maintenance and Support Activities:

These activities are performed for the purpose of maintenance, repair, and upkeep of the facility equipment and grounds. Examples of these types of activities include welding, degreasing, use of lubricants, forklift activity, architectural coating, grounds maintenance, vehicle traffic, work performed by contractors, etc.

An internal combustion engine is used in emergencies to drive a water pump for the purpose of fighting fires at the facility. The internal combustion engine is limited to use for maintenance, testing and emergencies only.

Storage Tanks:

This facility stores vegetable oil, vinegar, chlorine and ammonia. There are also a number of small, sealed drums and containers which are not expected to emit any type of air pollutants.

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

TITLE V PERMIT MODIFICATIONS AND RENEWAL

1. The owner or operator shall submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for renewal no later than April 19, 2015 (12 months prior to the expiration date of the Title V permit).
[SMAQMD Rule 207 Section 301.4]
2. The owner or operator of a stationary source shall submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for minor Title V permit modification. The application shall be submitted after receiving any required preconstruction permit from the SMAQMD and before commencing operation associated with the Minor Title V permit modification.
[SMAQMD Rule 207 Section 301.6]
3. The owner or operator of a stationary source shall submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for a Significant Title V permit modification. The application shall not be submitted prior to receiving any required preconstruction permit from the SMAQMD but no later than 12 months after commencing an operation associated with the Significant Title V permit modification. Where an existing federally enforceable Title V permit condition would prohibit such change in operation or the stationary source is not required to obtain a preconstruction permit, the owner or operator must obtain a Title V permit modification before commencing operation.
[SMAQMD Rule 207 Section 301.7]
4. The applicant shall submit to the SMAQMD Air Pollution Control Officer timely updates to the Title V application as new requirements become applicable to the source.
[SMAQMD Rule 207 Section 302.1]
5. The applicant shall submit to the SMAQMD Air Pollution Control Officer any additional information necessary to correct any incorrect information in the Title V permit application upon becoming aware of such incorrect submittal or if the applicant is notified by the SMAQMD Air Pollution Control Officer of such incorrect submittal.
[SMAQMD Rule 207 Section 302.2]
6. The applicant shall submit to the SMAQMD Air Pollution Control Officer any additional information relating to the Title V application within 30 days if such information is requested in writing by the SMAQMD Air Pollution Control Officer.
[SMAQMD Rule 207 Section 302.3]
7. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted and the stationary source complies with SMAQMD Rule 207 Sections 303.1(a), (b), (c), and (d), in which case the existing Title V permit will remain in effect until the Title V permit renewal has been issued or denied.
[SMAQMD Rule 207 Section 303.2]

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

8. Any Title V application form, report, or compliance certification submitted pursuant to a federally enforceable requirement in this permit shall contain certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[SMAQMD Rule 207 Section 304]
9. This Title V permit shall have a 5-year fixed term from the date of issuance. The Title V permit shall have a new 5-year fixed term from the date of final action on reopening if the responsible official chooses to submit to the SMAQMD a complete Title V application for renewal upon reopening of the Title V permit pursuant to SMAQMD Rule 207 Sections 411 or 412, and the Title V permit is renewed according to the administrative procedures listed in SMAQMD Rule 207 Sections 401 through 408.
[SMAQMD Rule 207 Section 306]

COMPLIANCE

10. The permittee must comply with all conditions of the Title V permit.
[SMAQMD Rule 207 Section 305.1(k)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the Title V permit.
[SMAQMD Rule 207 Section 305.1(k)(2)]
12. This Title V permit may be modified, revoked, reopened and reissued, or terminated for cause.
[SMAQMD Rule 207 Section 305.1(k)(3)]
13. The permittee shall furnish to the SMAQMD Air Pollution Control Officer, within a reasonable time, any information that the SMAQMD Air Pollution Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit pursuant to SMAQMD Rule 207 Section 411, or to determine compliance with this Title V permit. Upon request, the permittee shall also furnish to the SMAQMD Air Pollution Control Officer copies of records required to be kept by conditions of this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality.
[SMAQMD Rule 207 Section 305.1(k)(4)]
14. Noncompliance with any federally enforceable requirement in this Title V permit is grounds for Title V permit termination, revocation and reissuance, modification, enforcement action or denial of the Title V permit renewal application. Any violation of the Title V permit shall also be a violation of SMAQMD Rule 207.
[SMAQMD Rule 207 Section 305.1(k)(5)]
15. A pending Title V permit action (e.g. a proposed permit revision) or notification of anticipated noncompliance does not stay any permit condition.
[SMAQMD Rule 207 Section 305.1(k)(6)]

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

16. This Title V permit does not convey any property rights of any sort or any exclusive privilege.
[SMAQMD Rule 207 Section 305.1(k)(7)]
17. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the SMAQMD Air Pollution Control Officer or an authorized representative to perform all of the following:
- A. Enter upon the stationary source's premises where this source is located, where emissions related activity is conducted or where records must be kept under the conditions of this permit;
 - B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - C. Inspect at reasonable times, the stationary source, equipment (including monitoring and air pollution control equipment), practices and operations regulated or required under this permit, and;
 - D. As authorized by the Federal Clean Air Act, sample or monitor at reasonable times, substances or parameters for the purpose of assuring compliance with the permit conditions or applicable federal requirements.
- [SMAQMD Rule 207 Section 413.1]**

REPORTS AND RECORDKEEPING

18. Monitoring Reports

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.
- B. The reporting periods for this permit shall be for the six month periods January 1 through June 30 and July 1 through December 31. The reports shall be submitted by July 30 and January 30 of each year respectively.
- C. All instances of deviations from Title V permit conditions must be clearly identified in such reports. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[SMAQMD Rule 207, Section 501.1]

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

19. Compliance Reports

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer and U.S. EPA (Air-3, U.S. EPA, Region IX) on an annual basis, unless required more frequently by additional applicable federal requirements such as Section 114(a)(3) and 504(b) (42 U.S.C. Sections 7414(a)(3) and 7661c(b)) of the Federal Clean Air Act, a certification of compliance by the responsible official with all terms and conditions contained in the Title V permit, including emission limitations, standards and work practices.
- B. The reporting period for this permit shall be January 1 through December 31. The report shall be submitted by January 30 of each year.
- C. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- D. The compliance certification shall include the following:
 - i. The identification of each term or condition of the Title V permit that is the basis of the certification.
 - ii. The method(s) used for determining the compliance status of the source, currently and over the reporting period, and whether such method(s) provides continuous or intermittent data.
 - iii. The status of compliance with the terms and conditions of the Title V permit for the period covered by the certification, based on the method designated in Section D(ii) of this condition.
 - iv. Such other facts as the SMAQMD Air Pollution Control Officer may require to determine the compliance status of the source.
 - v. In accordance with SMAQMD Rule 207 Section 305, a method for monitoring the compliance of the stationary source with its emissions limitations, standards and work practices.

[SMAQMD Rule 207 Section 413.4]

20. The permittee must notify the SMAQMD Air Pollution Control Officer of any occurrence which constitutes any emergency, as defined in SMAQMD Rule 207 Section 212, as soon as reasonably possible, but no later than one hour after its detection. If the emergency occurs when the SMAQMD Air Pollution Control Officer cannot be contacted, the report of the emergency shall be made at the commencement of the next regular working day. The notification shall identify the time, specific location, equipment involved and, to the extent known, the cause(s) of the occurrence.

[SMAQMD Rule 207 Section 501.2]

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

21. The permittee shall report within 24 hours of detection any deviation from a federally enforceable Title V permit condition not attributable to an emergency. In order to fulfill the reporting requirement of this condition, the permittee shall notify the SMAQMD Air Pollution Control Officer by telephone followed by a written statement describing the nature of the deviation from the federally enforceable permit condition.

[SMAQMD Rule 207 Section 501.3]

22. All monitoring data and support information required by a federally enforceable applicable requirement must be kept by the stationary source for a period of 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the federally enforceable applicable requirement in the Title V permit.

[SMAQMD Rule 207 Section 502.3]

RINGELMANN CHART

23. Except as otherwise provided in SMAQMD Rule 401 Section 100, the permittee shall not discharge into the atmosphere, from any single source of emission whatsoever, any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour which is:

- A. As dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
- B. Of such opacity as to obscure a human observer's view, or a certified calibrated in-stack opacity monitoring system to a degree equal to or greater than No. 1 on the Ringelmann Chart.

[SMAQMD Rule 401 Section 301]

PARTICULATE MATTER

24. The permittee shall take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from any construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation. Reasonable precautions shall include, but are not limited to:

- A. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways or the clearing of land.
- B. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles and other surfaces which can give rise to airborne dusts.

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

C. Other means approved by the SMAQMD Air Pollution Control Officer.
[SMAQMD Rule 403 Section 301]

25. Except as otherwise provided in SMAQMD Rule 406, the permittee shall not discharge into the atmosphere, from any source, particulate matter in excess of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot).

[SMAQMD Rule 404 Section 301]

26. The permittee shall not discharge into the atmosphere in any one hour from any source whatsoever dust or condensed fumes in total quantities in excess of the amount shown in the "Table for Process Weight and Allowable Discharge" of SMAQMD Rule 405.

[SMAQMD Rule 405 Section 301]

27. The permittee shall not discharge into the atmosphere particulate matter from the burning of any kind of material containing carbon in a free or combined state, from any single source of emission whatsoever, combustion contaminants in any state or combination thereof exceeding in concentration at the point of discharge: 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) of gas calculated to 12% carbon dioxide (CO₂) at standard conditions.

[SMAQMD Rule 406 Section 302]

SULFUR COMPOUNDS

28. The permittee shall not discharge into the atmosphere, from any single source of emission whatsoever, sulfur compounds, in any state or combination thereof, exceeding in concentration at the point of discharge: sulfur compounds, calculated as sulfur dioxide (SO₂): 0.2% by volume.

[SMAQMD Rule 406 Section 301]

29. Except as otherwise provided in SMAQMD Rule 420 Section 110, the permittee shall not burn any gaseous fuel containing sulfur compounds in excess of 1.14 grams per cubic meter (50 grains per 100 cubic feet) of gaseous fuel, calculated as hydrogen sulfide at standard conditions, or any liquid fuel or solid fuel having a sulfur content in excess of 0.5% by weight.

[SMAQMD Rule 420 Section 301]

ARCHITECTURAL COATING

30. Any coating applied to stationary structures and their appurtenances, to mobile homes, to pavements, or to curbs, shall meet the requirements of SMAQMD Rule 442.

[SMAQMD Rule 442 (09-05-1996 version)]

31. All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired.

[SMAQMD Rule 442 Section 304 (09-05-1996 version)]

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

32. The permittee shall not use volatile organic compounds for the cleanup of spray equipment unless equipment for collection of the cleaning compounds and minimizing its evaporation to the atmosphere is used.

[SMAQMD Rule 442 Section 305 (09-05-1996 version)]

33. The permittee shall keep a record of all architectural coatings purchased that are not clearly labeled as complying with the VOC content limits contained in SMAQMD Rule 442. Compliance in these cases can be determined by maintaining records of the manufacturer's certifications or by Material Safety Data Sheets (MSDS) that demonstrate compliance with the VOC limits of SMAQMD Rule 442.

[SMAQMD Rule 442 (09-05-1996 version) and SMAQMD Rule 207 Section 305]

EQUIPMENT BREAKDOWNS

34. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology based emission limitations if the following conditions are met:

A. The affirmative defense of an emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- i. An emergency occurred and that the permittee can identify the cause(s) of the emergency.
- ii. The permitted facility was at the time being properly operated.
- iii. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the Title V permit.
- iv. The permittee submitted notice of the emergency to the SMAQMD Air Pollution Control Officer within two working days of the time when emissions limitations were exceeded due to the emergency. The notice must contain a description of the emergency, and corrective actions taken.

B. In any enforcement proceedings, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[SMAQMD Rule 207 Section 414]

35. The permittee shall notify the SMAQMD Air Pollution Control Officer of any occurrence which constitutes an emergency as defined in SMAQMD Rule 207 Section 212 as soon as reasonably possible, but no later than one hour after its detection. If the emergency occurs when the SMAQMD Air Pollution Control Officer cannot be contacted, their report of the emergency shall be made at the commencement of the next regular working day. The notification shall identify the time, specific location, equipment involved and to the extent known, the cause(s) of the occurrence.

[SMAQMD Rule 207 Section 501.2]

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

PAYMENT OF FEES

36. The fee for (1) the issuance of an initial Title V operating permit, (2) the renewal and/or inspection of a Title V operating permit, (3) the modification of a Title V operating permit or (4) an administrative Title V permit amendment shall be based on the actual hours spent by the SMAQMD staff in evaluating the application and processing the operating permit. The fee shall be assessed in accordance with the hourly rate established in SMAQMD Rule 301 Section 308.12.

[SMAQMD Rule 207 Section 305.7 and SMAQMD Rule 301 Section 313]

37. After the provisions for granting permits as set forth in SMAQMD Rule 207 have been complied with, the permittee will be notified by mail of the fee due and payable and the date the fee is due. If the fee is not paid by the specified due date, the fee shall be increased by one half the amount and the applicant/permittee shall be notified by mail of the increased fee. If the increased fee is not paid within 30 days after notice the application/permit will be canceled/revoked and the applicant/permittee will be notified by mail.

[SMAQMD Rule 207 Section 305.7]

CLEAN AIR ACT FEES

38. After the U.S. EPA determines that the SMAQMD has failed to demonstrate attainment of the one hour ozone ambient air quality standard by the attainment year, the permittee, operating any major stationary source of ROC or NO_x, shall pay the Clean Air Act fees specified by the SMAQMD Air Pollution Control Officer in accordance with SMAQMD Rule 307.

[SMAQMD Rule 307]

EMISSION STATEMENTS

39. The permittee, when operating any stationary source that emits 25 tons or more per year of ROC or NO_x, shall annually provide the SMAQMD Air Pollution Control Officer with a written emission statement showing actual emissions of ROC and NO_x from that source.

[SMAQMD Rule 105]

ACCIDENTAL RELEASES

40. If subject to Section 112(r) of the Federal Clean Air Act and 40 CFR 68, the permittee shall register and submit to the U.S. EPA the required data related to the risk management plan (RMP) for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the Federal Clean Air Act as amended in 40 CFR 68.130. The list of substances, threshold quantities and accident prevention regulations promulgated under 40 CFR 68 do not limit in any way the general duty provisions under Section 112(r)(1) of the Federal Clean Air Act.

[40 CFR Part 68]

FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

41. If subject to Section 112(r) of the Federal Clean Air Act and 40 CFR 68, the permittee shall comply with the requirements of 40 CFR Part 68 no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- A. June 21, 1999,
 - B. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - C. The date on which a regulated substance is first present above a threshold quantity in a process.
[40 CFR 68]
42. If subject to Section 112(r) of the Federal Clean Air Act and 40 CFR 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR 68.
[40 CFR 68]
43. If subject to Section 112(r) of the Federal Clean Air Act and 40 CFR 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) of the Federal Clean Air Act as part of the annual compliance certification as required by SMAQMD Rule 207 Section 413.4.
[40 CFR 68]

TITLE VI REQUIREMENTS (OZONE DEPLETING SUBSTANCES)

44. The permittee, when opening appliances containing CFCs for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
[40 CFR 82 Subpart F]
45. Equipment used during the maintenance, service, repair, or disposal of appliances containing CFCs must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
[40 CFR 82 Subpart F]
46. The permittee, when performing maintenance, service, repair or disposal of appliances containing CFCs must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
[40 CFR 82 Subpart F]

NON-FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

APPLICABILITY:

1. The requirements outlined in this section pertain to the SMAQMD Rule 201 Permits to Operate and are not part of the Title V permit.

SMAQMD RULE 201 PERMIT RENEWAL

2. Permits to Operate issued to Campbell Soup Supply Company, LLC., pursuant to SMAQMD Rule 201 (non-Title V Permits to Operate), shall be renewed annually on February 24 and upon payment of the permit renewal fee established pursuant to SMAQMD Rule 301.
3. The SMAQMD Air Pollution Control Officer shall review every SMAQMD Rule 201 Permit to Operate upon annual renewal, pursuant to California Health and Safety Code Section 42301(c), to determine that permit conditions are adequate to ensure compliance with, and the enforceability of, SMAQMD rules and regulations applicable to the article, machine, equipment or contrivance for which the permit was issued. Applicable SMAQMD rules and regulations shall include those which were in effect at the time the permit was issued or modified, or which have subsequently been adopted and made retroactively applicable to an existing article, machine, equipment or contrivance, by the SMAQMD Board of Directors. The SMAQMD Air Pollution Control Officer shall revise the conditions, if such conditions are not consistent, in accordance with all applicable rules and regulations.

GENERAL

4. The SMAQMD Air Pollution Control Officer and/or authorized representatives, upon the presentation of credentials shall be permitted:
 - A. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate, and
 - B. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this Permit to Operate, and
 - C. To inspect any equipment, operation, or method required in this Permit to Operate, and
 - D. To sample emissions from the source or require samples to be taken.
5. Legible copies of all SMAQMD Rule 201 Permits to Operate shall be maintained on the premises with the equipment.

EQUIPMENT OPERATION

6. The equipment shall be properly maintained.

NON-FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

7. This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3 of the Health and Safety Code of the State of California or the Rules and Regulations of the SMAQMD.

EQUIPMENT BREAKDOWNS:

8. The permittee shall notify the SMAQMD Air Pollution Control Officer of any occurrence which constitutes a breakdown, as defined in SMAQMD Rule 602 Section 201, as soon as reasonably possible, but no later than one hour after its detection. If the breakdown occurs when the SMAQMD Air Pollution Control Officer cannot be contacted, the report of breakdown shall be made at the commencement of the next regular working day. The notification shall identify the time, specific location, equipment involved and, to the extent known, the cause(s) of the occurrence.
9. Upon notification of the breakdown condition, the SMAQMD Air Pollution Control Officer shall investigate the breakdown condition in accordance with uniform written procedures and guidelines relating to logging of initial reports on appropriate forms, investigation, and enforcement follow-up. If the occurrence does not constitute a breakdown condition, the SMAQMD Air Pollution Control Officer may take appropriate enforcement action.
10. An occurrence which constitutes a breakdown condition, and which persists only until the end of the production run or 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment, for which the period shall be 96 hours) shall constitute a violation of any applicable emission limitation or restriction prescribed by the SMAQMD Rules and Regulations; however, the SMAQMD Air Pollution Control Officer may elect to take no enforcement action if the owner or operator demonstrates to his satisfaction that a breakdown condition exists and the following requirements are met:
- A. The notification required in SMAQMD Rule 602 Section 301.1 is made; and
 - B. Immediate appropriate corrective measures are undertaken and compliance is achieved, or the process is shutdown for corrective measures before commencement of the next production run or within 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment for which the period shall be 96 hours). If the owner or operator elects to shut down, rather than come into immediate compliance, (s)he must nonetheless take whatever steps are possible to minimize the impact of the breakdown within the 24 hour period; and
 - C. The breakdown does not interfere with the attainment and maintenance of any national ambient air quality standard.
11. An occurrence which constitutes a breakdown condition shall not persist longer than the end of the production run or 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment, for which the period shall be 96 hours), unless an emergency variance has been obtained.

NON-FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

12. If the breakdown condition will either require more than 24 hours to correct or persists longer than the end of the production run (except for continuous air pollution monitoring equipment, for which the period shall be 96 hours) the owner or operator may, in lieu of shutdown, request the SMAQMD Air Pollution Control Officer to commence the emergency variance procedure set forth in SMAQMD Rule 602 Section 304.
13. No emergency variance shall be granted unless the chairperson of the SMAQMD Hearing Board or other designated member(s) of the SMAQMD Hearing Board finds that:
 - A. The occurrence constitutes a breakdown condition;
 - B. Continued operation is not likely to create an immediate threat or hazard to public health or safety; and
 - C. The requirements for a variance set forth in California Health & Safety Code Sections 42352 and 42353 have been met;
 - D. The continued operation in a breakdown condition will not interfere with the attainment or maintenance of the national ambient air quality standards.
14. At any time after an emergency variance has been granted, the SMAQMD Air Pollution Control Officer may request for good cause that the chairperson or designated member(s) reconsider and revoke, modify or further condition the variance. The procedures set forth in SMAQMD Rule 602 Section 304.1 shall govern any further proceedings conducted under this request.
15. An emergency variance shall remain in effect only for as long as necessary to repair or remedy the breakdown condition, but in no event after a properly noticed hearing to consider an interim or 90 day variance has been held, or 15 days from the date of the subject occurrence, whichever is sooner.
16. Within one week after a breakdown condition has been corrected, the owner or operator shall submit a written report to the SMAQMD Air Pollution Control Officer on forms supplied by the SMAQMD Air Pollution Control Officer describing the causes of the breakdown, corrective measures taken, estimated emissions during the breakdown and a statement that the condition has been corrected, together with the date of correction and proof of compliance. The SMAQMD Air Pollution Control Officer may, at the request of the owner or operator for good cause, extend up to 30 days the deadline for submittal of the report described in this subsection.
17. The burden of proof shall be on the owner or operator of the source to provide sufficient information to demonstrate that a breakdown did occur. If the owner or operator fails to provide sufficient information, the SMAQMD Air Pollution Control Officer shall undertake appropriate enforcement action.
18. Any failure to comply, or comply in a timely manner, with the reporting requirements established in SMAQMD Rule 602 Sections 301.1 and 401 shall constitute a separate violation of SMAQMD Rule 602.

NON-FEDERALLY ENFORCEABLE REQUIREMENTS - GENERAL

19. It shall constitute a separate violation of SMAQMD Rule 602 for any person to file with the SMAQMD Air Pollution Control Officer a report which falsely, or without probable cause, claims that an occurrence is a breakdown condition.

ARCHITECTURAL COATINGS

20. The permittee shall comply with the requirements of SMAQMD Rule 466 Solvent Cleaning when using volatile organic compounds for the cleanup of architectural coating application equipment. **[SMAQMD Rule 466 Sections 305 and 302.6 (05-24-2001 version)]**

DRAFT

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

- A. EQUIPMENT DESCRIPTION:** The information specified under this section is enforceable by the SMAQMD, U.S. EPA and the public.

The requirements specified under the following sections apply to the following equipment:

Boiler No. 1

P/O No. 20160 (for reference purposes only - not federally enforceable)
Manufacturer: Cleaver Brooks
Model: LD-94-R,H
Type: Steam
Main Burner Heat Input: 100 MMBTU/hour
Standing Pilot Flame Burner: 4.9 MMBTU/hour
Primary Fuel: Natural gas
Emergency Use Fuel: None

Boiler No. 2

P/O No. 20161 (for reference purposes only - not federally enforceable)
Manufacturer: Cleaver Brooks
Model: LD-94-R,H
Type: Steam
Main Burner Heat Input: 100 MMBTU/hour
Standing Pilot Flame Burner: 4.9 MMBTU/hour
Primary Fuel: Natural gas
Emergency Use Fuel: None

Boiler No. 3

P/O No. 20936 (for reference purposes only - not federally enforceable)
Manufacturer: Cleaver Brooks
Model: DLDH-94
Type: Steam
Main Burner Heat Input: 100 MMBTU/hour
Standing Pilot Flame Burner: 4.9 MMBTU/hour
Primary Fuel: Natural gas
Emergency Use Fuel: None

Boiler No. 4

P/O No. 20937 (for reference purposes only - not federally enforceable)
Manufacturer: Cleaver Brooks
Model: CA-28 (Retrofit)
Type: Steam
Main Burner Heat Input: 139 MMBTU/hour
Standing Pilot Flame Burner: 4.9 MMBTU/hour
Primary Fuel: Natural gas
Emergency Use Fuel: None

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

B. EQUIPMENT SPECIFIC FEDERALLY ENFORCEABLE REQUIREMENTS: The requirements specified under this section are enforceable by the SMAQMD, U.S. EPA and the public.

EMISSION LIMIT REQUIREMENTS:

1. The main burners of the boilers, when burning natural gas fuel, shall not emit:
 - A. Nitrogen oxides (NOx) in excess of 9 ppmvd, corrected to 3% O₂,
 - B. Carbon monoxide (CO) in excess of 400 ppmvd, corrected to 3% O₂,
 except during periods of startup or shutdown as defined in SMAQMD Rule 411 Boiler NOx. **[SMAQMD Rule 411]**

2. The standing pilot flame burners of the boilers, when burning natural gas fuel, shall not emit:
 - A. Nitrogen oxides (NOx) in excess of 30 ppmvd, corrected to 3% O₂,
 - B. Carbon monoxide (CO) in excess of 400 ppmvd, corrected to 3% O₂,
 except during periods of startup or shutdown as defined in SMAQMD Rule 411 Boiler NOx. **[SMAQMD Rule 411]**

3. The emissions from each main burner of Boiler Nos. 1, 2 and 3 (SMAQMD Permit to Operate Nos. 20160, 20161 and 20936), when combusting natural gas, shall not exceed the following limits: **[SMAQMD Rule 202]**

Pollutant	Emission Factor (A) lb/MMcf natural gas	Maximum Allowable Emissions for Natural Gas Combustion (B)	
		lb/day	lb/quarter
ROC	4	9.6	883
NOx	10.9	26.2	2,407
SO ₂	0.6	1.4	132
PM10	7.6	18.2	1,678
CO	(C)	576 (D)	52,992 (E)

- (A) Emission factors for SO₂ and PM10 are from U.S. EPA AP42, Tables 1.4-2 (7/98). Emission factor for NOx and ROC are based on the manufacturer's guarantee of 9 ppmvd NOx and 10 ppmvd ROC corrected to 3% O₂.
- (B) Maximum allowable emissions based on each boiler operating at 0.1 MMcf/hour, 24 hours/day and 92 days/quarter.

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

- (C) The CO emissions factors are based on source test data. The factors used shall be determined based on the method outlined in Attachment A.
 - (D) Daily emissions limit for CO is based on permitted levels for all four boilers combined and the emission factor derived from the method outlined in Attachment A.
 - (E) Quarterly emissions limit for CO is based on permitted daily level of 576 lbs/day and operating for 92 days/quarter for all four boilers combined.
4. The emissions from the main burner of Boiler No. 4 (SMAQMD Permit to Operate No. 20937), when combusting natural gas, shall not exceed the following limits:
[SMAQMD Rule 202]

Pollutant	Emission Factor (A) lb/MMcf natural gas	Maximum Allowable Emissions for Natural Gas Combustion (B)	
		lb/day	lb/quarter
ROC	4	13.3	1,228
NOx	36	36.4	3,345
SO ₂	0.6	2.0	184
PM10	7.6	25.4	2,333
CO	(C)	576 (D)	52,992 (E)

- (A) Emission factors for ROC, SO₂ and PM10 are from U.S. EPA AP42, Tables 1.4-1, 2, 3 (7/98). Emission factor for NOx is based on 30 ppmvd corrected to 3% O₂.
- (B) Maximum allowable emissions based on the boiler operating at 0.139 MMcf/hour, 24 hours/day and 92 days/quarter.
- (C) The CO emissions factors are based on source test data. The factors used shall be determined based on the method outlined in Attachment A.
- (D) Daily emissions limit for CO is based on permitted levels for all four boilers combined and the emission factor derived from the method outlined in Attachment A.
- (E) Quarterly emissions limit for CO is based on permitted daily level of 576 lbs/day and operating for 92 days/quarter for all four boilers combined.

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

5. The emissions from each standing pilot flame burner of Boilers Nos. 1, 2, 3 and 4 (SMAQMD Permit to Operate Nos. 20160, 20161, 20936, 20937) when combusting natural gas, shall not exceed the following limits:
[SMAQMD Rule 202]

Pollutant	Emission Factor (A) lb/MMcf natural gas	Maximum Allowable Emissions for Natural Gas Combustion (B)	
		lb/day	lb/quarter
ROC	5.5	0.6	60
NOx	36.4	4.3	394
SO ₂	0.6	0.1	6
PM10	7.6	0.9	82
CO	296	576 (C)	52,992 (D)

- (A) Emission factors for ROC, SO₂ and PM10 are from U.S. EPA AP42, Tables 1.4-2 (7/98). Emission factors for NOx and CO are based on 30 ppmvd NOx and 400 ppmvd CO corrected to 3% O₂.
 (B) Emissions based on maximum capacity of 0.0049 MMcf/hour, the emission factors in this table and operating for 24 hours/day and 92 days/quarter, except for CO.
 (C) Daily emissions limit for CO is based on permitted levels for all four boilers combined and the emission factor derived from the method outlined in Attachment A.
 (D) Quarterly emissions limit for CO is based on permitted daily level of 576 lbs/day and operating for 92 days/quarter for all four boilers combined.

6. The combined NOx emissions from Boilers Nos. 1, 2, 3 and 4 (SMAQMD Permit to Operate Nos. 20160, 20161, 20936, 20937) when combusting natural gas shall not exceed the following limits:
[SMAQMD Rule 202]

Pollutant	Quarter 1	Quarter 2	Quarter 3	Quarter 4
NOx, lb/day (A)	275	250	450	350
NOx, tons/quarter (B)	12.5	11.4	20.5	15.9

- (A) The daily NOx limit is a limit requested by the permittee that is less than the maximum daily operating capacity emissions. The maximum daily operating capacity emissions are 480 lb/day based on 0.412 MMcf natural gas/hour, 40 ppm NOx (48.5 lb/MMcf) and 24 hours/day.
 (B) The quarterly NOx limit is a limit requested by the permittee that is less than the maximum quarterly operating capacity emissions. The maximum quarterly operating capacity emissions are 21.6, 21.8, 22.0 and 22.0 tons/quarter for Quarters 1, 2, 3 and 4

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

respectively.

7. The combined emissions from Boilers Nos. 1, 2, 3 and 4 (SMAQMD Permit to Operate Nos. 20160, 20161, 20936, 20937) when combusting natural gas shall not exceed the following limits:

[SMAQMD Rule 202]

Pollutant	Emission Factor lb/MMcf natural gas	Maximum Allowable Emission for Natural Gas Combustion (D)	
		lb/day	tons/year
ROC	Boilers #1, #2, #3, & #4 – Main Burner = 4 (A). Boilers #1 & 2 – Standing Pilot Flame Burner = 5.5 (B)	27.6	3
NOx	Use CEM Data	See Condition No. 6	60.3
SO ₂	0.6 (B)	6	0.6
PM10	7.6 (B)	49.4	5
CO	(C)	576	54

(A) Emission factors for ROC from manufacturer's guarantee of 10 ppmvd corrected to 3% O₂.

(B) Emission factor for ROC, SO₂ and PM10 are from U.S. EPA AP42, Table 1.4-2 (7/98).

(C) The CO factors used shall be determined based on the criteria outlined in Attachment A.

(D) Based on daily and annual natural gas usage and the emission factor listed in this table.

EQUIPMENT OPERATION AND MONITORING REQUIREMENTS:

8. The respective flue gas recirculation systems shall operate whenever the boilers are operating.

[SMAQMD Rule 201 Section 405]

9. A computerized tracking system that maintains a continuous daily record of fuel usage shall be installed, maintained and operated to monitor periods of individual standing pilot flame burner usage to calculate CO emissions in accordance with Attachment A.

[SMAQMD Rule 411 Section 306.1]

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

10. The permittee shall operate and properly maintain a continuous emission monitoring (CEM) system that has been approved by the SMAQMD Air Pollution Control Officer.
- A. The CEM system shall monitor and record nitrogen oxides, carbon monoxide and oxygen.
 - B. The CEM system shall be installed and operated in compliance with the U.S. EPA monitoring requirements (40 CFR 60.13).
 - C. The CEM system shall comply with the U.S. EPA performance specifications (40 CFR Part 60 Appendix B Performance Specifications 2, 3 and 4 (if CO is 0-100 ppm) and 4A (if CO is 0-200 ppm)).
 - D. The CEM system shall comply with the U.S. EPA quality assurance procedures (40 CFR 60 Appendix F).
 - E. The Data Acquisition System (DAS) shall have the capability of expressing the measured NOx and CO emissions in terms of parts per million by volume dry (ppmvd) corrected to 3% O₂.
 - F. The DAS shall record NOx and CO emissions in the engineering units defined by the SMAQMD Rule 201 Permit to Operate.
 - G. The DAS shall record all data in compliance with the U.S. EPA quality assurance procedures (40 CFR 60 Appendix F).
 - H. The CEM system and DAS shall monitor and collect a minimum of data as follows:
 - 1. Obtain at least two data points per hour in order to calculate a valid 1-hour arithmetic average. 40 CFR 60.13(E)(2) requires the CEM system to complete at least one cycle of operation (sampling, analyzing and data recording) for each successive 15-minute period.
 - 2. Compliance with the emission limits of Condition No. 1 and No. 2 shall be determined on an hourly basis using the three previous one hour average emissions concentrations.
- [SMAQMD Rule 201 Section 405]**
11. The fuel flow meters to monitor the natural gas fuel flow rate to the boilers shall be properly maintained, calibrated and operated.
[SMAQMD Rule 201 Section 405]
12. The continuous emissions tracking system to calculate the hourly, daily, quarterly and yearly NOx emissions from the boilers shall be properly maintained and operated to insure the emission limits in Condition Nos. 1, 2, 3, 4, 5, 6, and 7 are not exceeded.
[SMAQMD Rule 201 Section 405]

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

RECORDKEEPING AND REPORTING REQUIREMENTS:

13. The following record shall be continuously maintained on site for the most recent three year period and shall be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly and yearly records shall be made available for inspection within 30 days of the end of the previous quarter or year respectively.

[SMAQMD Rule 201 Section 405]

Frequency	Information to be recorded
Hourly	A. Average hourly NOx concentration in ppmvd corrected to 3% O ₂ for each boiler, using the average of the three previous one hour average concentrations. Condition Nos. 1 and 2 B. Total hourly NOx emissions from all four boilers (lb/hour), using the average of the three previous one hour average concentrations. Condition No. 6
Daily	C. Total daily natural gas usage for each boiler. (cf/day) D. Total daily NOx, CO, ROC, SO ₂ , and PM10 emissions, when burning natural gas, from all four boilers (lb/day). Condition No. 7
Quarterly	E. Total quarterly NOx emissions, when burning natural gas, for all four boilers (tons/quarter). Condition No. 6
Yearly	F. Total yearly natural gas usage for each boiler (cf/year). G. Total yearly NOx, CO, ROC, SO ₂ , and PM10 emissions, when burning natural gas, from all four boilers (tons/day). Condition No. 7

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

14. A written report shall be submitted to the SMAQMD Air Pollution Control Officer that includes the following information:

[SMAQMD Rule 201 Section 405]

Frequency	Information to be included in report
Quarterly: Submitted by the following dates of each year: January 30 April 30 July 30 October 30	A. Quarterly operating report to include the following: <ul style="list-style-type: none"> i. Total natural gas fuel usage for all four boilers. (cubic feet/quarter) ii. Total NOx emissions from natural gas fuel usage for all four boilers. (tons/quarter)
Quarterly: Submitted by the following dates of each year: January 30 April 30 July 30 October 30	B. Quarterly excess emissions report to include the following: (Excess emissions are defined as any period during which the emissions of NOx exceeds the limit of Condition Nos. 1, 2, 3, 4, 5, 6, and 7). <ul style="list-style-type: none"> i. The date and time of commencement and completion of each time period of excess emissions. ii. The magnitude of excess emissions in units of ppmvd, pounds per hour, pounds per day, pounds per quarter or pounds per year as applicable. iii. Specific identification of each period of excess emissions that occurs during start-ups, shutdowns and malfunctions of the boiler including: <ul style="list-style-type: none"> a. The nature and cause of any malfunctions (if known). b. The corrective action taken or preventative measures adopted. iv. The date and time identifying each period during which the continuous emission monitor or the continuous emissions tracking system was inoperative, except for zero and span checks, and the nature of the system repairs or adjustments. v. When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired or adjusted, such information shall be stated in the report.

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

EMISSION TESTING REQUIREMENTS:

15. A NOx and CO source test of each boiler, when using natural gas as a fuel, shall be performed once each calendar year to verify compliance with Condition No. 1. A separate NOx and CO source test of the standing pilot flame burner of each boiler shall be performed once each calendar year to verify compliance with Condition No. 2. The tests shall conform to the following test condition and time schedule:
- A. Submit a source test plan to the SMAQMD Air Pollution Control Officer for approval at least 30 days before the source test is to be performed.
 - B. Notify the SMAQMD Air Pollution Control Officer at least 7 days prior to the source test date.
 - C. Submit the source test report to the SMAQMD Air Pollution Control Officer within 60 days from the completion of the source test.
[SMAQMD Rule 411]
16. Test methods used and combustion rates for the source tests shall be those specified in SMAQMD Rule 411 Boiler NOx, Section 501.1.
[SMAQMD Rule 411]
17. Relative Accuracy Test of the continuous emissions monitoring system shall be performed at the time of the yearly emissions test as specified in Condition No. 10.D.
[SMAQMD Rule 411]

EQUIPMENT SPECIFIC REQUIREMENTS – BOILERS NOS. 1, 2, 3, AND 4

ATTACHMENT A

CAMPBELL SOUP SUPPLY COMPANY, LLC

CO EMISSION CALCULATION METHOD

SMAQMD Rule 201 Permit to Operate No.	Equipment	Rating	CO Emission Factor A	Daily Usage B	Daily Usage Units	CO Emission (lb/day) = A x B
20160	BOILER #1 (MAIN BURNER)	100 MMBTU/HR	30 LB/MMCF OR (A)		MMCF/DAY	
20160	BOILER #1 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
20161	BOILER #2 (MAIN BURNER)	100 MMBTU/HR	30 LB/MMCF OR (A)		MMCF/DAY	
20161	BOILER #2 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
20936	BOILER #3 (MAIN BURNER)	100 MMBTU/HR	30 LB/MMCF OR (A)		MMCF/DAY	
20936	BOILER #3 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
20937	BOILER #4 (MAIN BURNER)	139 MMBTU/HR	187 LB/MMCF OR (A)		MMCF/DAY	
20937	BOILER #4 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
TOTAL DAILY CO EMISSIONS						
[NOT TO EXCEED 576 LB/DAY]						

(A) Data from the most recent source test shall be used if that data produces an emission factor greater than the value shown in this table.

EQUIPMENT SPECIFIC REQUIREMENTS – DRY INGREDIENT AIR POLLUTION CONTROL SYSTEM NOS. 1, 2 and 3

- A. EQUIPMENT DESCRIPTION:** The information specified under this section is enforceable by the SMAQMD, U.S. EPA and the public.

The requirements specified under the following sections apply to the following equipment:

Dry Ingredient Air Pollution Control System No. 1

P/O No. 16888 (for reference purposes only - not federally enforceable)
Device: Rotoclone
Manufacturer: American Air Filter
Type: W
Size: 27
Capacity: 16,000 cfm
Horsepower: 40
Venting: (6) flour mixers

Dry Ingredient Air Pollution Control System No. 2

P/O No. 17180 (for reference purposes only - not federally enforceable)
Device: Rotoclone
Manufacturer: American Air Filter
Type: W
Size: 27
Capacity: 16,000 cfm
Horsepower: 40
Venting: (3) bag dumpers, (1) bag opening station and (1) feeder and collector

Dry Ingredient Air Pollution Control System No. 3

P/O No. 18710 (for reference purposes only - not federally enforceable)
Device: Rotoclone
Manufacturer: American Air Filter
Type: W
Size: 12
Capacity: 3,000 cfm
Horsepower: 10
Venting: (2) rock salt storage silos

EQUIPMENT SPECIFIC REQUIREMENTS – DRY INGREDIENT AIR POLLUTION CONTROL SYSTEM NOS. 1, 2 and 3

B. EQUIPMENT SPECIFIC FEDERALLY ENFORCEABLE REQUIREMENTS: The requirements specified under this section are enforceable by the SMAQMD, U.S. EPA and the public.

EMISSIONS LIMIT REQUIREMENTS:

1. The emissions from Dry Ingredient Air Pollution Control System No. 1 shall not exceed the following limits:

[SMAQMD Rule 202 Section 410]

Pollutant	Emission Factor (A) grains/dscf	Maximum Allowable Emissions (B) lb/quarter
PM10	0.002	606

- (A) Emission factor for PM10 assumes 0.2 grains/dscf inlet concentration and 99% control.
(B) Emissions based on maximum capacity (16,000 cfm), 24 hours/day and 92 days/quarter.

2. The emissions from Dry Ingredient Air Pollution Control System No. 2 shall not exceed the following limits:

[SMAQMD Rule 202 Section 410]

Pollutant	Emission Factor (A) grains/dscf	Maximum Allowable Emissions (B) lb/quarter
PM10	0.002	606

- (A) Emission factor for PM10 assumes 0.2 grains/dscf inlet concentration and 99% control.
(B) Emissions based on maximum capacity (16,000 cfm), 24 hours/day and 92 days/quarter.

3. The emissions from Dry Ingredient Air Pollution Control System No. 3 shall not exceed the following limits:

[SMAQMD Rule 202 Section 410]

Pollutant	Emission Factor (A) grains/dscf	Maximum Allowable Emissions (B) lb/quarter
PM10	0.002	114

- (A) Emission factor for PM10 assumes 0.2 grains/dscf inlet concentration and 99% control.
(B) Emissions based on maximum capacity (3,000 cfm), 24 hours/day and 92 days/quarter.

EQUIPMENT SPECIFIC REQUIREMENTS – DRY INGREDIENT AIR POLLUTION CONTROL SYSTEM NOS. 1, 2 and 3

EQUIPMENT OPERATION REQUIREMENTS:

4. The following equipment shall not operate unless vented to the designated APC Rotoclone.
 - A. (6) flour mixers
 - B. (3) bag dumpers
 - C. bag opening station
 - D. feeder and collector
 - E. (2) rock salt storage silos**[SMAQMD Rule 201 Section 405]**

5. The APC Rotoclone shall not operate unless the water supply is on.
[SMAQMD Rule 201 Section 405]

RECORDKEEPING REQUIREMENTS:

6. None (because maximum allowable emissions are based on maximum capacity, 24 hours/day and 92 days/quarter).
[SMAQMD Rule 201 Section 405]

EMISSIONS TESTING REQUIREMENTS:

7. None

EQUIPMENT SPECIFIC REQUIREMENTS – INTERNAL COMBUSTION ENGINES, EMERGENCY USE

- A. EQUIPMENT DESCRIPTION:** The information specified under this section is enforceable by the SMAQMD, U.S. EPA and the public.

The requirements specified under the following sections apply to the following equipment:

Internal Combustion Engine - Emergency Use

P/O No. 14634 (for reference purposes only - not federally enforceable)
Manufacturer: Cummins
Model: V-378-F2
Serial No.: 20216434
Horsepower: 136 bhp at 3,300 rpm
Fuel: Diesel no. 2
Driving: Water pump for fire fighting

Internal Combustion Engine - Emergency Use

P/O No. 21074 (for reference purposes only - not federally enforceable)
Manufacturer: Cummins
Model: CFP83-F40
Serial No.: 46893638 (Diesel #2)
Horsepower: 288 bhp at 1,760 rpm
Fuel: Diesel no. 2
Driving: Water pump for fire fighting

**EQUIPMENT SPECIFIC REQUIREMENTS – INTERNAL COMBUSTION ENGINES,
 EMERGENCY USE**

B. EQUIPMENT SPECIFIC FEDERALLY ENFORCEABLE REQUIREMENTS: The requirements specified under this section are enforceable by the SMAQMD, U.S. EPA, and the public.

EMISSIONS LIMIT REQUIREMENTS:

- The emissions from the IC engine (SMAQMD Permit to Operate No. 14634) shall not exceed the following limits:
[SMAQMD Rule 202]

Pollutant	Emission Factor (A) grams/hp-hr	Maximum Allowable Emissions (B)	
		lb/quarter	lb/year
ROC	1.14	68	68
NOx	14.0	840	840
SO ₂	0.16	10	10
PM10	1.0	60	60
CO	3.03	182	182

- (A) Emission factor for NOx, ROC, PM10, and CO from U.S. AP42, Table 3.3-3 (1/95). SO₂ emission factor based on 0.05% sulfur by weight in the fuel.
 (B) Emissions based on 136 hp, 200 hours/quarter and 200 hours/year of operation.

- The emissions from the IC engine (SMAQMD Permit to Operate No. 21074) shall not exceed the following limits:
[SMAQMD Rule 202]

Pollutant	Emission Factor (A) grams/hp-hr	Maximum Allowable Emissions (B)	
		lb/quarter	lb/year
ROC	1.0	127	127
NOx	4.9	622	622
SO ₂	0.1645	21	21
PM10	0.149	19	19
CO	3.7	330	330

- (A) Emission factor for NOx, ROC and CO are based on BACT standards. PM10 emissions are based on T-BACT standards. SO₂ emission factor based on 0.05% sulfur by weight in the fuel.
 (B) Emissions based on 288 hp, 200 hours/quarter and 200 hours/year of operation.

**EQUIPMENT SPECIFIC REQUIREMENTS – INTERNAL COMBUSTION ENGINES,
 EMERGENCY USE**

EQUIPMENT OPERATION REQUIREMENTS:

3. The IC engine (SMAQMD Permit to Operate No. 14634) shall operate only for the following purposes and shall not operate more than the following hours:
[SMAQMD Rule 201 Section 405]

Type of Operational Hours	Maximum Allowable Operation		
	hours/day	hours/quarter	hours/year
Maintenance Purposes (A):			
	<u>NFPA 25 Section</u>		
Weekly testing -	5-3.2.2	0.5	
Annual testing (no flow) -	5-3.3.2.1	1	
Annual testing (flow) -	5-3.3.1	1	40
Quarterly testing -	9-5.2.1	0.5	
Every five years -	9-5.2.2	4	
All Operation:			
Maintenance (A) and Emergency (B)	24	200	200

(A) Maintenance purposes is defined as: the necessary operation of an IC engine in order to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standards for Inspection, Testing and Maintenance of Water-Based Fire Protection Systems," 1998 edition or when required by the SMAQMD to verify compliance with the applicable rules and regulations.

(B) Emergency is defined as: when a fire is detected and the fire pump is operated to supply water for fire suppression.

**EQUIPMENT SPECIFIC REQUIREMENTS – INTERNAL COMBUSTION ENGINES,
 EMERGENCY USE**

4. The IC engine (SMAQMD Permit to Operate No. 21074) shall operate only for the following purposes and shall not operate more than the following hours:
[SMAQMD Rule 201 Section 405]

Type of Operational Hours	Maximum Allowable Operation	
	hours/quarter	hours/year
Maintenance Purposes (A):		
<u>NFPA 25 Section</u>		
Weekly testing - 5-3.2.2		
Annual testing (no flow) - 5-3.3.2.1		
Annual testing (flow) - 5-3.3.1	40	40
Quarterly testing - 9-5.2.1		
Every five years - 9-5.2.2		
All Operation:		
Maintenance (A) and Emergency (B)	200	200

(A) Maintenance purposes is defined as: the necessary operation of an IC engine in order to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standards for Inspection, Testing and Maintenance of Water-Based Fire Protection Systems," 1998 edition or when required by the SMAQMD to verify compliance with the applicable rules and regulations.

(B) Emergency is defined as: when a fire is detected and the fire pump is operated to supply water for fire suppression.

5. The IC engine (SMAQMD Permit to Operate No. 14634) shall be equipped with a non-resetting hour meter, with a minimum display capability of 999 hours, to ensure compliance with Conditions No. 1 and No. 3.

[SMAQMD Rule 201 Section 405]

6. The IC engine (SMAQMD Permit to Operate No. 21074) shall be equipped with a non-resetting hour meter, with a minimum display capability of 9,999 hours, to ensure compliance with Conditions No. 2 and No. 4.

[SMAQMD Rule 201 Section 405]

7. Upon request of the SMAQMD Air Pollution Control Officer, once each year, during daylight hours, each IC engine shall be run at maximum anticipated load, from a cold start condition, for observation of compliance with opacity limitations.

[SMAQMD Rule 201 Section 405]

**EQUIPMENT SPECIFIC REQUIREMENTS – INTERNAL COMBUSTION ENGINES,
 EMERGENCY USE**

8. Each IC engine shall be fueled with:

- A. CARB diesel fuel, or
 - B. An alternative diesel fuel that meets the requirements of the Verification Procedure (as codified in CCR, Title 13, Sections 2700-2710), or
 - C. An alternative fuel, or
 - D. CARB diesel fuel used with fuel additives that meets the requirements of the Verification Procedure (as codified in CCR, Title 13, Sections 2700-2710), or
 - E. Any combination of fuels listed in this condition.
- [SMAQMD Rule 201 Section 405]**

RECORDKEEPING REQUIREMENTS:

9. For each IC engine, the following records shall be continuously maintained onsite for the most recent three year period and shall be made available to the SMAQMD Air Pollution Control Officer upon request. Monthly, quarterly and yearly records shall be made available within 30 days of the end of the reporting period.

[SMAQMD Rule 201 Section 405]

Frequency	Information to be recorded
When operated	A. Date. B. Purpose - either maintenance (M) or emergency (E). C. Number of hours of operation.
When operated for maintenance	D. When operating for maintenance purposes, the daily maintenance record shall also include the type of maintenance performed: <ul style="list-style-type: none"> i. Weekly run NFPA 25, Sec. 5-3.2.2 ii. Annual no flow test NFPA 25, Sec. 5-3.3.2.1 iii. Annual flow test NFPA 25, Sec. 5-3.3.1 iv. Quarterly test NFPA 25, Sec. 9-5.2.1 v. Quincennial (every 5 years) testing NFPA 25, Sec. 9-5.2.2 vi. Required by SMAQMD.

**EQUIPMENT SPECIFIC REQUIREMENTS – INTERNAL COMBUSTION ENGINES,
 EMERGENCY USE**

Frequency	Information to be recorded
	vii. Repair verification (describe repair performed).
Monthly	E. Total number of hours of operation for each operating mode. (hours/month)
Quarterly	F. Total number of hours of operation for each operating mode. (hours/quarter)
Yearly	G. Total number of hours of operation for each operating mode. (hours/year)
All fuel deliveries	H. Retain fuel purchase records that account for all fuel purchased for use in the engine. Fuel purchase records shall include: <ul style="list-style-type: none"> i. Identification of type of fuel (e.g. CARB diesel, alternate diesel, etc.). ii. Quantity of fuel purchased. iii. Date of fuel purchase. iv. Signature of person receiving fuel. v. Signature of fuel provider indicating that fuel was delivered.

EMISSIONS TESTING REQUIREMENTS:

7. None

EQUIPMENT SPECIFIC REQUIREMENTS – INKJET PRINTING OPERATIONS

- A. EQUIPMENT DESCRIPTION:** The information specified under this section is enforceable by the SMAQMD, U.S. EPA and the public.

The requirements specified under the following sections apply to the following equipment:

Inkjet Printing Operations

P/O No. 22542 (for reference purposes only - not federally enforceable)
Description: Inkjet printing operation consisting of various manufacturers and various model number inkjet printers.

- B. EQUIPMENT SPECIFIC FEDERALLY ENFORCEABLE REQUIREMENTS:** The requirements specified under this section are enforceable by the SMAQMD, U.S. EPA, and the public.

EMISSIONS LIMIT REQUIREMENTS:

1. The emissions from the inkjet printing operation (SMAQMD Permit to Operate No. 22542) shall not exceed the following limits:
[SMAQMD Rule 202]

Pollutant	Maximum Allowable Emissions	
	lb/quarter (A)	lb/year
ROC	82	1,500

(A) The daily ROC limit is based on all printers (26 present at the time of initial permitting) emitting ROC at maximum capacity for 24 hours/day).

2. Compliance with the quarterly emission limitation specified in Condition No. 1 shall be determined as follows:

$$\begin{aligned} \text{ROC Emissions} &= (\text{Inks used, gallons/quarter}) \times (\text{VOC content, lb/gal}) \\ (\text{lb/quarter}) &+ (\text{Make-Up fluid used, gallons/quarter}) \times (\text{VOC content, lb/gal}) \\ &+ (\text{Cleaning solution used, gallons/quarter}) \times (\text{VOC content, lb/gal}) \end{aligned}$$

[SMAQMD Rule 201 Section 405]

EQUIPMENT OPERATION REQUIREMENTS:

4. Each ink jet printer shall be operated and maintained in accordance with the manufacturer's recommendations.
[SMAQMD Rule 201 Section 405]
5. All VOC-containing cloth or paper used for surface preparation or equipment cleanup shall be stored or disposed of in closed containers.
[SMAQMD Rule 201 Section 405]

EQUIPMENT SPECIFIC REQUIREMENTS – INKJET PRINTING OPERATIONS

RECORDKEEPING REQUIREMENTS:

6. The following records shall be continuously maintained onsite for the most recent five year period and shall be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly records as specified in the table below shall be made available for inspection within 30 days from the end of the calendar quarter.

Frequency	Information to be recorded
When operated for maintenance	A. List of currently used materials, including the following information: i. Material type by name, code and manufacturer. ii. VOC content of each ink, make-up fluid and cleaning solvent as-applied including water and exempt compounds (grams/liter or lb/gal).
Daily	B. Daily records are not required because all printers are permitted at maximum capacity for 24 hours/day.
Quarterly	C. Usage of each ink, make-up fluid and cleaning solvent as-applied including water and exempt compounds (gallons/quarter). D. Calculation of ROC emissions by the method specified in Condition No. 2.

[SMAQMD Rule 201 Section 405]

EMISSIONS TESTING REQUIREMENTS:

7. None