



October 1, 2015

Wade Broughton  
General Mills Operations, Inc.  
2000 W. Turner Road  
Lodi, CA 95242

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # N-355**  
**Project # N-1153090**

Dear Mr. Broughton:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct permit N-355-100-0 (under project N-1133591) into the Title V operating permit. This permit authorized the installation of a bulk bag material unloading system.

Enclosed is the engineering evaluation with the following attachments: proposed Title V permit, recently issued Authority to Construct permits N-355-100-0, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet  
Director of Permit Services

Enclosures

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

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

## **Title V APPLICATION REVIEW Minor Modification**

**Facility Number:** N-355  
**Facility Name:** General Mills Operations, Inc.

**Mailing Address:** 2000 W. Turner Road  
Lodi, CA 95242

**Contact Name:** Wade Broughton  
**Phone:** (209) 334-7090

**Responsible Official:** Jason Schierling  
**Title:** Plant Manager

**Processing Staff:** Jag Kahlon  
**Project Number:** N-1153090  
**Date:** September 30, 2015

### **I. PROPOSAL**

General Mills has proposed to incorporate Authority to Construct (ATC) permit N-355-100-0 (issued under ATC project N-1133591) into their Title V operating permit. This permit was issued without Certificate of Conformity (COC). The permit authorized the installation of a bulk bag material unloading system.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for permit requirements.

### **II. FACILITY LOCATION**

This facility is located at 2000 West Turner Road in Lodi, California.

### **III. EQUIPMENT DESCRIPTION**

#### **BULK BAG MATERIAL UNLOADING SYSTEM**

The following condition was established as a part of the equipment description:

- Bulk bag material unloading system shall consist of a HAF Equipment Model BNAV bulk bag unloader, a HAF Equipment Model VTF1600 FG enclosed screw conveyor, an enclosed Sweeco Model XS40128 scalper, and a pneumatic conveying system using two HAF equipment Model 2400 HLFG ingredient filter receivers (AC-107 for Puff line 1, AC-108 for Puff line 2) both

equipped with sock filters and a blower package shared by the ingredient filter receivers. [District Rule 2201]

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This project is a Minor Modification under Rule 2520 since the project under which ATC N-355-100 was issued was not an SB-288 or Federal major modification under Rule 2201. Therefore, public review is not required for this project.

#### **V. APPLICABLE REQUIREMENTS**

Rule 2520 Federally Mandated Operating Permits (6/21/01)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

##### N-355-100:

This is a new permit for bulk bag unloading system. This system is comprised of bulk bag unloader, an enclosed screw conveyor, an enclosed scalper and a pneumatic conveying system using ingredient filter receiver on puff line 1 and puff line 2. These filter receivers are equipped with sock filters and a blower package.

All requirements in this permit are now Federally enforceable through Title V permit.

#### **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act;
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
  6. Do not seek to consolidate overlapping applicable requirements.

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

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); and
3. 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 III).

Compliance is expected with this Rule.

#### **APPENDICES**

- Appendix I: Proposed Title V Operating Permit No. N-355-100-1  
Appendix II: Authority to Construct Permit N-355-100-0  
Appendix III: Permit Application  
Appendix IV: Emissions Change

Appendix I  
Proposed Title V Operating Permit No. N-355-100-1

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-355-100-1

**EXPIRATION DATE:** 04/30/2016

**EQUIPMENT DESCRIPTION:**  
BULK BAG MATERIAL UNLOADING SYSTEM

DRAFT

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Bulk bag material unloading system shall consist of a HAF Equipment Model BNAV bulk bag unloader, a HAF Equipment Model VTF1600 FG enclosed screw conveyor, an enclosed Sweeco Model XS40128 scalper, and a pneumatic conveying system using two HAF equipment Model 2400 HLFM ingredient filter receivers (AC-107 for Puff line 1, AC-108 for Puff line 2) both equipped with sock filters and a blower package shared by the ingredient filter receivers. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Visible emissions at the exhaust of the blower 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
4. Each filter receiver shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge 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
5. The differential pressure indicated by the pressure differential gauge associated with each filter receiver shall stay within the range of 0.1 to 8 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from this system shall not exceed 0.3 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Differential operating pressure for each filter receiver shall be monitored and recorded on each day that the bulk unloading system operates. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Records of all maintenance of each filter receiver, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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.

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Appendix II  
Authority to Construct Permit N-355-100-0



**COPY**

**AUTHORITY TO CONSTRUCT**

**PERMIT NO** N 355-100-0

**ISSUANCE DATE** 12/10/2013

**LEGAL OWNER OR OPERATOR** GENERAL MILLS OPERATIONS INC  
**MAILING ADDRESS** ATTN ACCOUNTS PAYABLE  
MN

**LOCATION** WADE BROUGHTON  
2000 W TURNER ROAD  
LODI CA 95242

**EQUIPMENT DESCRIPTION**  
BULK BAG MATERIAL UNLOADING SYSTEM

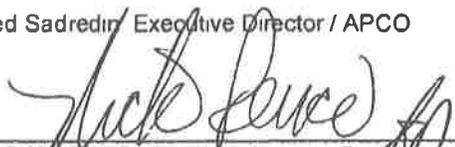
**CONDITIONS**

- 1 The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520 [District Rule 2520] Federally Enforceable Through Title V Permit
- 2 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 3 Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration [District Rule 4201]
- 4 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]
- 5 Bulk bag material unloading system shall consist of a HAF Equipment Model BNAV bulk bag unloader a HAF Equipment Model VTF1600 FG enclosed screw conveyor an enclosed Sweeco Model XS40128 scalper and a pneumatic conveying system using two HAF equipment Model 2400 HLFQ ingredient filter receivers (AC 107 for Puff line 1 AC-108 for Puff line 2) both equipped with sock filters and a blower package shared by the ingredient filter receivers [District Rule 2201]
- 6 Visible emissions at the exhaust of the blower shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour [District Rule 2201]
- 7 Each filter receiver shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location [District Rule 2201]

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 355-100-0 Dec 10 2013 11:17AM KAHLOUJ J ml pect NOT Req Use

- 8 The differential pressure indicated by the pressure differential gauge associated with each filter receiver shall stay within the range of 0.1 to 8 inches of water column [District Rule 2201]
- 9 PM10 emissions from this system shall not exceed 0.3 pounds during any one day [District Rule 2201]
- 10 Differential operating pressure for each filter receiver shall be monitored and recorded on each day that the bulk unloading system operates [District Rule 2201]
- 11 Records of all maintenance of each filter receiver including all change outs of filter media shall be maintained [District Rule 2201]
- 12 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]
- 13 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]

Appendix III  
Permit Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT       MINOR MODIFICATION      [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>General Mills Operations</b>	
2. MAILING ADDRESS: STREET/P.O. BOX: <b>2000 W. Turner Rd</b> CITY: <b>Lodi</b> STATE: <b>CA</b> 9-DIGIT ZIP CODE: <b>95242-2239</b>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <b>2000 W. Turner Rd.</b> CITY: <b>Lodi</b> 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <b>Manufacturer of cereals and baking mixes.</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (Include Permit #s if known, and use additional sheets if necessary) <b>N-355-100</b> <b>Modify permit to include operation of Bulk Bag Unloading &amp; Ingredient Transfer System in Cereal Plant 1.</b>  <b>For questions regarding this application, contact Wade Broughton</b>	
6. TYPE OR PRINT NAME OF APPLICANT: <b>Jason Schierling</b>	TITLE OF APPLICANT: <b>Plant Manager</b>
7. SIGNATURE OF APPLICANT: 	DATE: <b>February 1, 2014</b> PHONE: <b>(209) 334-7090</b> FAX: <b>(209) 334-7090</b> EMAIL: <b>wade.broughton@genmills.com</b>

**For APCD Use Only:**

<p>DATE STAMP: <b>RECEIVED</b> <b>SEP 25 2015</b> SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: \$ <b>0</b> CHECK#: _____ DATE PAID: _____ PROJECT NO: <b>N1153090</b> FACILITY ID: <b>N-355</b></p>
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Central Regional Office • 1990 E Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

**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  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

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 forgoing is correct and true:

  
 Signature of Responsible Official

2/1/14  
 Date

Jason Schierling

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)

Appendix IV  
Emissions Change

## Emissions Change

Per application review under project N-1133591, the quarterly emissions changes (QEC) are summarized in the following table:

Pollutant	QEC (lb)			
	Q1	Q2	Q3	Q4
PM <sub>10</sub>	27	27	28	28