

AIR QUALITY
MANAGEMENT DISTRICT**STATEMENT OF BASIS
FOR
MINOR MODIFICATION OF TITLE V FEDERAL OPERATING PERMIT**

APPLICATION NO.: TV2010-03-02
DATE: September 11, 2012
REVIEWING ENGINEER: Michelle Joe

A. FACILITY INFORMATION

FACILITY NAME: Campbell Soup Supply Company, LLC

LOCATION: 6200 Franklin Boulevard
Sacramento, CA

MAILING ADDRESS: 6200 Franklin Boulevard
Sacramento, CA 95824

RESPONSIBLE OFFICIAL: Brett Buatti, V.P. Manufacturing
Sacramento Operations
(916) 395-5110

CONTACT PERSON: Jennifer Cornés, Environmental Project Engineer
Sacramento Operations
(916) 395-5137

B. PURPOSE OF THIS STATEMENT OF BASIS

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes that make the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

C. PERMIT ACTIONS

Previous Permit Actions

The following permit actions have occurred since the initial Federal Operating Permit No. 96-03-01 was issued:

<u>Permit Action</u>	<u>Date</u>	<u>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
2nd Permit Renewal	04-19-2011	TV2010-03-01
1st Administrative Amendment	10-03-2011	TV2010-03-01A

Current Permit Action

This 1st minor modification to the 2nd permit renewal will be assigned the following permit number: TV2010-03-02.

The specific changes to the Title V permit are described in Section E below.

D. FACILITY DESCRIPTION

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

1. Manufacturing of 2-piece and 3-piece cans for food product packaging.
2. 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.

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. However, under normal operation, steam is imported from a cogeneration facility located at the SW corner of the Campbell Soup property line. The cogeneration facility is owned by Sacramento Power Authority (subsidiary of SMUD) and operated by Wood Group GTS. The steam is routed through steam lines to the facility areas where it is required. The boilers have special equipment and special natural gas burners to reduce the air emissions of nitrogen oxides (NO_x) and carbon monoxide (CO).

D. FACILITY DESCRIPTION (continued)

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, use of lubricants, forklift activity, architectural coating, grounds maintenance, vehicle traffic, work performed by contractors, etc.

Storage Tanks:

This facility stores materials such as 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.

PROPOSED

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION

1. Replace Dry Ingredient Handling Air Pollution Control System No. 1

Description of Modification Requested:

Related documents:

03-05-2012	A/C No. 23336 Engineering Evaluation	(Attachment B)
03-06-2012	A/C No. 23336 Authority to Construct	(Attachment C)
08-28-2012	Title V Permit Modification Application	(Attachment D)

The following modification is to SMAQMD Rule 201 Permit to Operate No. 16888.

Campbell Soup Supply Company, LLC (CSSC) is proposing to replace the existing dry ingredient handling air pollution control system No. 1 (Rotoclone No. 1) as it has exceeded its useful life.

The new rotoclone is an exact replacement of the existing rotoclone, but will be constructed of 304 stainless steel rather than carbon steel. The rotoclone is a combination centrifugal blower and dynamic wet scrubber. A water spray at the inlet of the rotoclone wets particulates contained in the air stream. The air-dust-slurry mixture is drawn through the rotoclone where the dust slurry is separated from the air. The scrubbed, clean air is exhausted to the atmosphere. Water, dust slurry, and a secondary air stream are discharged tangentially from the rotoclone housing through an expansion chamber attached to the rotoclone. The water and dust slurry flow to the drain connection at the bottom of the expansion chamber to the sewer and secondary air is exhausted through the top of the expansion chamber.

Equipment Modifications:

There are no modifications proposed to the previous size or maximum air flow rate capacity of the rotoclone as listed in the Title V permit.

Emission Modifications:

There is no proposed change to the previous potential to emit with this replacement.

Basis for the Applicable Federally Enforceable Requirements:

SMAQMD Rule 201	General Permit Requirements
SMAQMD Rule 202	New Source Review
SMAQMD Rule 207	Title V - Federal Operating Permit Program
SMAQMD Rule 401	Ringelmann Chart
SMAQMD Rule 404	Particulate Matter

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

Compliance Status:

CSSC complies with the applicable federally enforceable requirements.

Category of Title V Permit Modification:

The proposed permit modification does not meet any of the following criteria describing a "Significant" Title V permit modification:

SMAQMD Rule 207 -

- 233.1 Involves any modification under Section 112(g) of Title I (42 U.S.C. Section 412(g) of the Federal Clean Air Act, or under EPA regulations promulgated pursuant to Title I of the Federal Clean Air Act, including 40 CFR Part 51, 52, 60, 61, and 63.
- 233.2 Involves relaxation or significant change to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
- 233.3 Involves case-by-case determination of an emission limit or other standard.
- 233.4 Involves a stationary source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
- 233.5 Attempts to set or change a Title V permit term or condition which allows a source to avoid an applicable federal requirement including:
 - a. A federally enforceable emission cap pursuant to Title I of the Federal Clean Air Act, or
 - b. An alternative HAP emission limit pursuant to Section 112(i)(5) (Section 42 U.S.C. Section 7412(j)(5) of the Federal Clean Air Act.
- 233.6 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than: 25 tons per year of nitrogen oxides or 25 tons per year of volatile organic compounds when aggregated with all other increases in potential to emit over the period of five consecutive years before the application for modification, and including the calendar year of the most recent application; or 40 tons per year of sulfur dioxide, 100 tons per year of carbon monoxide, 15 tons per year of PM10, or 10 tons per year of PM2.5.
- 233.7 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than the levels as defined in 40 CFR 52.21(b)(49).

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

The proposed modification also does not meet any of the following criteria describing an "Administrative Amendment" Title V permit modification:

SMAQMD Rule 207 -

- 202.1 Corrects typographical errors.
- 202.2 Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the stationary source;
- 202.3 Requires more frequent monitoring or reporting by the responsible official of the stationary source.
- 202.4 Allows for change in ownership or operational control of a source where the Air Pollution Control Officer determines that no other change in the Title V permit is necessary, provided that a written agreement containing a specific date for transfer of Title V permit responsibility, coverage, and liability between the current and new responsible official has been submitted to the Air Pollution Control Officer.
- 202.5 Incorporates into the Title V permit the conditions of a preconstruction permit that is issued to an existing Title V stationary source through SMAQMD Rule 202, NEW SOURCE REVIEW and meeting the procedural requirements specified in Sections 401 through 408 of SMAQMD Rule 202 and the compliance requirements in Section 305 of SMAQMD Rule 202.

Finally, the proposed modification does not violate any applicable requirements which are federally enforceable.

Therefore, the permit modification is classified as a "Minor" Title V permit modification under SMAQMD Rule 207 Section 220.

220 MINOR TITLE V PERMIT MODIFICATION: A modification to a federally enforceable condition in a Title V permit to operate which:

- 220.1 Is not a significant Title V permit modification;
- 220.2 Is not an administrative Title V permit amendment; and
- 220.3 Does not violate any applicable requirements which are federally enforceable.

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

2. Replace Dry Ingredient Handling Air Pollution Control System No. 2

Description of Modification Requested:

Related documents:

03-05-2012	A/C No. 23325 Engineering Evaluation	(Attachment B)
03-06-2012	A/C No. 23325 Authority to Construct	(Attachment C)
08-28-2012	Title V Permit Modification Application	(Attachment D)

The following modification is to SMAQMD Rule 201 Permit to Operate No. 17180.

Campbell Soup Supply Company, LLC (CSSC) is proposing to replace the existing dry ingredient handling air pollution control system No. 2 (Rotoclone No. 2) as it has exceeded its useful life.

The new rotoclone is an exact replacement of the existing rotoclone, but will be constructed of 304 stainless steel rather than carbon steel. The rotoclone is a combination centrifugal blower and dynamic wet scrubber. A water spray at the inlet of the rotoclone wets particulates contained in the air stream. The air-dust-slurry mixture is drawn through the rotoclone where the dust slurry is separated from the air. The scrubbed, clean air is exhausted to the atmosphere. Water, dust slurry, and a secondary air stream are discharged tangentially from the rotoclone housing through an expansion chamber attached to the rotoclone. The water and dust slurry flow to the drain connection at the bottom of the expansion chamber to the sewer and secondary air is exhausted through the top of the expansion chamber.

Equipment Modifications:

Currently, Rotoclone No. 2 vents 3 bagged-flour dumping stations located on the first floor, 2 MSG and sugar batching stations on the second floor, and 1 flour sifter hood on the fourth floor of building W4. Two of the bagged-flour dumping stations have since been removed and a modification to the existing ductwork to vent 5 additional bag unloading stations is now proposed. The rotoclone will serve as an emergency backup to the filters controlling the 5 bag unloading stations in the event that the filters fail. This proposed ductwork would not require any modifications to the previous size or maximum air flow rate capacity of the rotoclone as listed in the Title V permit.

Emission Modifications:

There is no proposed change to the previous potential to emit with this replacement.

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

Basis for the Applicable Federally Enforceable Requirements:

SMAQMD Rule 201	General Permit Requirements
SMAQMD Rule 202	New Source Review
SMAQMD Rule 207	Title V - Federal Operating Permit Program
SMAQMD Rule 401	Ringelmann Chart
SMAQMD Rule 404	Particulate Matter

Compliance Status:

CSSC complies with the applicable federally enforceable requirements.

Category of Title V Permit Modification:

The proposed permit modification does not meet any of the following criteria describing a "Significant" Title V permit modification:

SMAQMD Rule 207 -

- 233.1 Involves any modification under Section 112(g) of Title I (42 U.S.C. Section 412(g) of the Federal Clean Air Act, or under EPA regulations promulgated pursuant to Title I of the Federal Clean Air Act, including 40 CFR Part 51, 52, 60, 61, and 63.
- 233.2 Involves relaxation or significant change to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
- 233.3 Involves case-by-case determination of an emission limit or other standard.
- 233.4 Involves a stationary source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
- 233.5 Attempts to set or change a Title V permit term or condition which allows a source to avoid an applicable federal requirement including:
 - a. A federally enforceable emission cap pursuant to Title I of the Federal Clean Air Act, or
 - b. An alternative HAP emission limit pursuant to Section 112(i)(5) (Section 42 U.S.C. Section 7412(j)(5) of the Federal Clean Air Act.

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

- 233.6 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than: 25 tons per year of nitrogen oxides or 25 tons per year of volatile organic compounds when aggregated with all other increases in potential to emit over the period of five consecutive years before the application for modification, and including the calendar year of the most recent application; or 40 tons per year of sulfur dioxide, 100 tons per year of carbon monoxide, 15 tons per year of PM10, or 10 tons per year of PM2.5.
- 233.7 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than the levels as defined in 40 CFR 52.21(b)(49).

The proposed modification also does not meet any of the following criteria describing an "Administrative Amendment" Title V permit modification:

SMAQMD Rule 207 -

- 202.1 Corrects typographical errors.
- 202.2 Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the stationary source.
- 202.3 Requires more frequent monitoring or reporting by the responsible official of the stationary source.
- 202.4 Allows for change in ownership or operational control of a source where the Air Pollution Control Officer determines that no other change in the Title V permit is necessary, provided that a written agreement containing a specific date for transfer of Title V permit responsibility, coverage, and liability between the current and new responsible official has been submitted to the Air Pollution Control Officer.
- 202.5 Incorporates into the Title V permit the conditions of a preconstruction permit that is issued to an existing Title V stationary source through SMAQMD Rule 202, NEW SOURCE REVIEW and meeting the procedural requirements specified in Sections 401 through 408 of SMAQMD Rule 202 and the compliance requirements in Section 305 of SMAQMD Rule 202.

Finally, the proposed modification does not violate any applicable requirements which are federally enforceable.

Therefore, the permit modification is classified as a "Minor" Title V permit modification under SMAQMD Rule 207 Section 220.

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

220 MINOR TITLE V PERMIT MODIFICATION: A modification to a federally enforceable condition in a Title V permit to operate which:

- 220.1 Is not a significant Title V permit modification;
- 220.2 Is not an administrative Title V permit amendment; and
- 220.3 Does not violate any applicable requirements which are federally enforceable.

3. Replace Dry Ingredient Handling Air Pollution Control System No. 3

Description of Modification Requested:

Related documents:

07-02-2012	A/C No. 23441 Engineering Evaluation	(Attachment B)
07-02-2012	A/C No. 23441 Authority to Construct	(Attachment C)
08-28-2012	Title V Permit Modification Application	(Attachment D)

The following modification is to SMAQMD Rule 201 Permit to Operate No. 18710.

Campbell Soup Supply Company, LLC (CSSC) is proposing to replace the existing dry ingredient handling air pollution control system No. 3 (Rotoclone No. 3) as it has exceeded its useful life.

The new rotoclone is an exact replacement of the existing rotoclone, but will be constructed of 304 stainless steel rather than carbon steel. The rotoclone is a combination centrifugal blower and dynamic wet scrubber. A water spray at the inlet of the rotoclone wets particulates contained in the air stream. The air-dust-slurry mixture is drawn through the rotoclone where the dust slurry is separated from the air. The scrubbed, clean air is exhausted to the atmosphere. Water, dust slurry, and a secondary air stream are discharged tangentially from the rotoclone housing through an expansion chamber attached to the rotoclone. The water and dust slurry flow to the drain connection at the bottom of the expansion chamber to the sewer and secondary air is exhausted through the top of the expansion chamber.

Equipment Modifications:

There are no modifications proposed to the previous size or maximum air flow rate capacity of the rotoclone as listed in the Title V permit.

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

Emission Modifications:

During the original permitting of this rotoclone under SMAQMD Rule 201 Permit to Operate No. 18710, CSSC had proposed an uncontrolled 0.000374 lb/cf (2.618 grains/dscf) PM10 inlet concentration, 99.5% control efficiency and 4 hours/week and 208 hours/year operation. However, the rotoclone was instead permitted similar to Rotoclone No. 1 & 2's potential to emit, which was based on CSSC's proposal of an uncontrolled 0.2 grains/dscf PM10 inlet concentration and 99% control efficiency. Since both PM10 emission factors (2.618 grains/dscf and 0.2 grains/dscf) were proposed by CSSC originally, CSSC was allowed to select the original 2.618 grains/dscf PM10 inlet concentration and 99.5% control to correct the potential to emit for this replacement application (see Attachment B – A/C No. 23441 Engineering Evaluation, Appendix A – Rotoclone No. 3 PM10 Emission Factor Discussion). As a result of this emission factor correction, the quarterly PM10 potential to emit changed from 114 lb/quarter to 743 lb/quarter. However, since the historic PM10 emission factor was incorrect, no emissions increase has occurred to require Best Available Control Technology (BACT) requirements.

Basis for the Applicable Federally Enforceable Requirements:

SMAQMD Rule 201	General Permit Requirements
SMAQMD Rule 202	New Source Review
SMAQMD Rule 207	Title V - Federal Operating Permit Program
SMAQMD Rule 401	Ringelmann Chart
SMAQMD Rule 404	Particulate Matter

Compliance Status:

CSSC complies with the applicable federally enforceable requirements.

Category of Title V Permit Modification:

The proposed permit modification does not meet any of the following criteria describing a "Significant" Title V permit modification:

SMAQMD Rule 207 -

- 233.1 Involves any modification under Section 112(g) of Title I (42 U.S.C. Section 412(g) of the Federal Clean Air Act, or under EPA regulations promulgated pursuant to Title I of the Federal Clean Air Act, including 40 CFR Part 51, 52, 60, 61, and 63.
- 233.2 Involves relaxation or significant change to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
- 233.3 Involves case-by-case determination of an emission limit or other standard.

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

- 233.4 Involves a stationary source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
- 233.5 Attempts to set or change a Title V permit term or condition which allows a source to avoid an applicable federal requirement including:
- a. A federally enforceable emission cap pursuant to Title I of the Federal Clean Air Act, or
 - b. An alternative HAP emission limit pursuant to Section 112(i)(5) (Section 42 U.S.C. Section 7412(j)(5) of the Federal Clean Air Act.
- 233.6 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than: 25 tons per year of nitrogen oxides or 25 tons per year of volatile organic compounds when aggregated with all other increases in potential to emit over the period of five consecutive years before the application for modification, and including the calendar year of the most recent application; or 40 tons per year of sulfur dioxide, 100 tons per year of carbon monoxide, 15 tons per year of PM₁₀, or 10 tons per year of PM_{2.5}.
- 233.7 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than the levels as defined in 40 CFR 52.21(b)(49).

The proposed modification also does not meet any of the following criteria describing an "Administrative Amendment" Title V permit modification:

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- 202.1 Corrects typographical errors.
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- 202.3 Requires more frequent monitoring or reporting by the responsible official of the stationary source.
- 202.4 Allows for change in ownership or operational control of a source where the Air Pollution Control Officer determines that no other change in the Title V permit is necessary, provided that a written agreement containing a specific date for transfer of Title V permit responsibility, coverage, and liability between the current and new responsible official has been submitted to the Air Pollution Control Officer.

E. DESCRIPTION OF TITLE V PERMIT MODIFICATION (continued)

202.5 Incorporates into the Title V permit the conditions of a preconstruction permit that is issued to an existing Title V stationary source through SMAQMD Rule 202, NEW SOURCE REVIEW and meeting the procedural requirements specified in Sections 401 through 408 of SMAQMD Rule 202 and the compliance requirements in Section 305 of SMAQMD Rule 202.

Finally, the proposed modification does not violate any applicable requirements which are federally enforceable.

Therefore, the permit modification is classified as a "Minor" Title V permit modification under SMAQMD Rule 207 Section 220.

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- 220.1 Is not a significant Title V permit modification;
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- 220.3 Does not violate any applicable requirements which are federally enforceable.

F. APPLICABLE FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS AND EQUIPMENT SPECIFIC REQUIREMENTS

The Applicable Federally Enforceable General Requirements and Equipment Specific Requirements will remain the same as those described in the Title V permit Statement of Basis TV2010-03-01. The requirements will not be repeated here (see Title V permit file for Applicable Federally Enforceable General Requirements and Equipment Specific Requirements).

PROPOSED

G. TITLE V PERMIT CONDITIONS

It is recommended that the Campbell Soup Supply Company, LLC Title V Federal Operating Permit be modified to incorporate the minor modifications specified above as TV2010-03-02.

See proposed Title V Federal Operating Permit No. TV2010-03-02 for permit conditions.

Approved by:  Date: 11/19/12

PROPOSED

ATTACHMENT A

**SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY
ENFORCEABLE REQUIREMENTS"
FOR
CAMPBELL SOUP SUPPLY COMPANY**

**SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR CAMPBELL SOUP SUPPLY COMPANY**

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	101	General Provisions and Definitions 09/03/1998 adoption	Yes - no related conditions are included in the permit because of general nature of the rule.
●	●	102	Circumvention 11/29/1983 adoption	Yes - no related conditions are included in the permit because of general nature of the rule.
●	●	103	Exceptions 11/29/1983 adoption	No - source does not operate the type of equipment described in this rule.
●	●	104	General Conformity 11/03/1994 adoption	No - the rule's purpose is to have the SMAQMD review federal conformity findings.
●	●	105	Emission Statement 09/05/1996 adoption	No - actual emissions of ROC and NOx are less than 25 tons/year.
●	●	107	Alternative Compliance	No - it is not a SIP approved rule.
●	●	108	Minor Violations	No - it is not a SIP approved rule.
●	●	201	General Permit Requirements 11/20/1984 adoption	Yes - no related conditions are included in the permit.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	*	202	New Source Review 11/20/1984 adoption	Yes - related conditions are included in the permit. (* SMAQMD Rule 202 was a SIP approved rule until it was replaced by new SMAQMD Rules 203 and 214 on August 19, 2011. The New Source Review (NSR) and Prevention of Significant Deterioration (PSD) requirements of SMAQMD Rule 202 that were applicable to and the basis for permitting actions at the stationary source prior to August 19, 2011 still remain as applicable federally enforceable requirements.)
●	●	203	Prevention of Significant Deterioration 2/26/1991 adoption	No - the source is not considered a new major source or a major modification as defined in 40 CFR 52.21(b).
		204	Emission Reduction Credits	No - it is not a SIP approved rule.
		205	Community Bank and Priority Reserve Bank	No - it is not a SIP approved rule.
		206	Mobile and Transportation Source Emission Reduction Credits	No - it is not a SIP approved rule.
●	*	207	Title V Federal Operating Permit Program	Yes - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the approved Title V Permit Program.)
		208	Acid Rain	No - it is not a SIP approved rule.
		209	Limiting Potential to Emit	No - it is not a SIP approved rule.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		210	Synthetic Minor Source Status	No - it is not a SIP approved rule.
		211	MACT at Major Sources of Hazardous Air Pollutants	No - it is not a SIP approved rule. (For reference purposes, although this is not a SIP approved rule it is federally enforceable because it is part of the approved Title V Permit Program.)
●	●	214	Federal New Source Review 10/28/2010 adoption	Yes - related conditions are included in the permit.
●	*	301	Stationary Source Permit Fees	Yes - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the approved Title V Permit Program.)
		302	Hearing Board Fees	No - it is not a SIP approved rule.
		303	Agricultural Burning Permit Fees	No - it is not a SIP approved rule.
		304	Plan Fees	No - it is not a SIP approved rule.
		305	Environmental Document Preparation and Processing Fees	No - it is not a SIP approved rule.
		306	Air Toxics Fees	No - it is not a SIP approved rule.
●	●	307	Clean Air Act Fees 09/26/2002 adoption	Yes - no related conditions are included in the permit because of limited applicability.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	401	Ringelmann Chart 04/05/1983 adoption	Yes - related conditions are included in the permit.
●		402	Nuisance	No - it is not a SIP approved rule.
●	●	403	Fugitive Dust 11/29/1983 adoption	Yes - related conditions are included in the permit.
●	●	404	Particulate Matter 11/20/1984 adoption	Yes - related conditions are included in the permit.
●	●	405	Dust and Condensed Fumes 11/29/1983 adoption	Yes - related conditions are included in the permit.
●	●	406	Specific Contaminants 11/29/1983 adoption	Yes - related conditions are included in the permit.
●	●	407	Open Burning 11/29/1983 adoption	Yes - no related conditions are included in the permit.
●	●	408	Incinerator Burning 11/29/1983 adoption	No - the source does not operate an incinerator.
●	●	409	Orchard Heaters 11/29/1983 adoption	No - the source does not operate orchard heaters.
●	●	410	Reduction of Animal Matter 11/29/1983 adoption	No - the source does not operate equipment for the reduction of animal matter.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	411	Boiler NOx 08/23/2007 adoption	Yes - related conditions are included in the permit.
●	●	412	Stationary IC Engines at Major Stationary Sources of NOx 06/01/1995 adoption	Yes - related conditions are included in the permit.
●	●	413	Stationary Gas Turbines 03/24/2005 version	No - the source does not operate a gas turbine.
●	●	414	Natural Gas Fired Water Heaters 08/01/1996 adoption 03/25/2010 rule version is not SIP approved	Yes - the permit does not contain any related conditions because the rule targets the sale of water heaters, not the operation of water heaters
●	●	420	Sulfur Content of Fuels 11/29/1983 adoption	Yes - related conditions are included in the permit.
●	●	441	Organic Solvents 11/29/1983 adoption	No - the source is exempt from this rule because it is subject to SMAQMD Rule 451.
●	●	442	Architectural Coatings 09/05/1996 adoption 05/24/2001 rule version is not SIP approved	Yes - related conditions are included in the permit.
●	●	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09/05/1996 adoption	No - the source does not operate synthetic organic chemical or polymer manufacturing equipment.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	444	Petroleum Solvent Dry Cleaning 11/29/1983 adoption	No - the source does not operate petroleum solvent dry cleaning equipment.
●	●	446	Storage of Petroleum Products 11/16/1993 adoption	No - the source only stores petroleum products in tanks that are exempt from the rule requirements (< 40,000 gallons).
●	●	447	Organic Liquid Loading 04/02/1998 adoption	No - the source does not operate organic liquid loading equipment.
●	●	448	Gasoline Transfer into Stationary Storage Containers 02/02/1995 adoption	No - the source does transfer gasoline into storage tanks subject to the rule requirements (≥250 gallons).
●	●	449	Transfer of Gasoline into Vehicle Fuel Tanks 09/26/2002 adoption	No - the source is exempt from this rule because it is exempt from SMAQMD Rule 448.
●	●	450	Graphic Arts Operations 10/23/2008 adoption	No - the source does not operate a graphic arts process as defined in the rule.
●	●	451	Surface Coating of Miscellaneous Metal Parts and Products 11/29/1983 adoption 10/28/2010 rule version is not SIP approved	Yes - no related conditions are included in the permit.
●	●	452	Can Coating 09/25/2008 adoption	No - the source does not operate can coating equipment.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		453	Cutback and Emulsified Asphalt Paving Materials 11/29/1983 adoption	No - the source does not manufacture or apply cutback or emulsified asphalt paving materials.
●		454	Degreasing Operations 09/25/2008 adoption	No - the source uses exempt solvents as defined in the rule.
●		455	Pharmaceuticals Manufacturing 11/29/1983 adoption	No - the source does not manufacture pharmaceuticals.
●		456	Aerospace Coating Operations 09/05/1996 adoption	No - the source does not coat aerospace parts.
●		458	Large Commercial Bread Bakeries 09/05/1996 adoption	No - the source does not produce bread products.
●		459	Automotive, Truck and Heavy Equipment Refinishing Operations 10/02/1997 adoption	No - the source does not refinish vehicles.
●		460	Adhesives and Sealants	No - it is not a SIP approved rule.
●		463	Wood Products Coatings 09/25/2008 adoption	No - the source does not coat wood products.
●		464	Organic Chemical Manufacturing Operations 07/23/1998 adoption	No - the source does not manufacture organic chemicals.
		465	Polyester Resin Operations	No - it is not a SIP approved rule.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	466	Solvent Cleaning 05/23/2002 adoption 10/28/2010 rule version is not SIP approved	Yes - related conditions are included in the permit.
		485	Municipal Landfill Gas	No - it is not a SIP approved rule.
●	●	501	Agricultural Burning 11/29/1983 adoption	No - the source does not conduct agricultural burning.
●		601	Procedure before the Hearing Board	No - it is not a SIP approved rule.
●		602	Breakdown Conditions: Emergency Variance	No - it is not a SIP approved rule.
●	●	701	Emergency Episode Plan 05/27/1999 adoption	No - the source's actual emissions are less than 50 tons/year of ROC and NOx and less than 100 tons/year of CO and PM10.
●		801	New Source Performance Standards	No - it is not a SIP approved rule. Note: there is an equivalent federal regulation.
		901	General Requirements	No - it is not a SIP approved rule. Note: there is an equivalent federal regulation.
		902	Asbestos	No - it is not a SIP approved rule. Note: there is an equivalent federal regulation.
		903	Mercury	No - it is not a SIP approved rule. Note: there is an equivalent federal regulation.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		904	Airborne Toxic Control Measures	No - it is not a SIP approved rule. Note: there are equivalent federal regulations for some of the listed ATCMs.
		1002	Fleet Inventory	No - it is not a SIP approved rule.
		1003	Reduced-Emission Fleet Vehicles/Alternative Fuels	No - it is not a SIP approved rule.
		1005	Mobile Source Emission Reduction Credits/Banking	No - it is not a SIP approved rule.
		1006	Transportation Conformity	No - it is not a SIP approved rule.

PROPOSED

ATTACHMENT B

Engineering Evaluation for Authority to Construct

PROPOSED

AIR QUALITY
MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT EVALUATION

APPLICATION NO.:	<u>23325 & 23336</u>
DATE:	<u>March 5, 2012</u>
ISSUING ENGINEER:	<u>Michelle Joe</u>

FACILITY NAME: CAMPBELL SOUP SUPPLY COMPANY, LLC

LOCATION: 6200 FRANKLIN BLVD., SACRAMENTO, CA 95824

PROPOSAL: OBTAIN AN AUTHORITY TO CONSTRUCT/PERMIT TO OPERATE FOR A NEW APC ROTOCLONE TO REPLACE ROTOCLONE NO. 1 (P/O 16888) AND REPLACE AND MODIFY THE EXISTING DUCTWORK TO VENT 5 ADDITIONAL BAG UNLOADING STATIONS OF ROTOCLONE NO. 2 (P/O 17180).

INTRODUCTION:

Campbell Soup Supply Company, LLC (CSSC) is a canned food and juice processing facility, which includes the manufacturing processes of ingredient handling and processing, ingredient blending, container filling and closing, heat sterilization of canned products, labeling, packaging, and warehousing. For the ingredient handling and processing process, CSSC is proposing to replace the old rotoclone no. 1 (previously permitted under P/O 16888) and rotoclone no. 2 (previously permitted under P/O 17180), and modify the existing ductwork of rotoclone no. 2 to vent 5 additional bag unloading stations.

Each new rotoclone is an exact replacement of the existing rotoclone, but will be constructed of 304 stainless steel rather than carbon steel. The rotoclone is a combination centrifugal blower and dynamic wet scrubber. A water spray at the inlet of the rotoclone wets particulates contained in the air stream. The air-dust-slurry mixture is drawn through the rotoclone where the dust slurry is separated from the air. The scrubbed, clean air is exhausted to the atmosphere. Water, dust slurry, and a secondary air stream are discharged tangentially from the rotoclone housing through an expansion chamber attached to the rotoclone. The water and dust slurry flow to the drain connection at the bottom of the expansion chamber to the sewer and secondary air is exhausted through the top of the expansion chamber.

Currently, rotoclone no. 2 vents 3 bagged-flour dumping stations located on the first floor, 2 MSG and sugar batching stations on the second floor, and 1 flour sifter hood on the fourth floor of building W4. Two of the bagged-flour dumping stations have since been removed and a modification to the existing ductwork to vent 5 additional bag unloading stations is now proposed. The rotoclone will serve as an emergency backup to the filters controlling the 5 bag unloading stations in the event that the filters fail.

No ductwork changes are proposed for rotoclone no. 1.

The estimated startup date for the new rotoclone and modified ductwork is July 31, 2012.

EQUIPMENT DESCRIPTION:

A/C 23325 – APC Rotoclone No. 2 (previously P/O 17180):

Manufacturer: American Air Filter (AAF)
Type: "W"
Size: 27
Capacity: 16,000 ACFM
Horsepower: 40
Venting: 1 bagged-flour dumping station (existing)
5 bulk bag unloading stations (new)
2 MSG and sugar batching stations (existing)
1 flour sifter hood (existing)

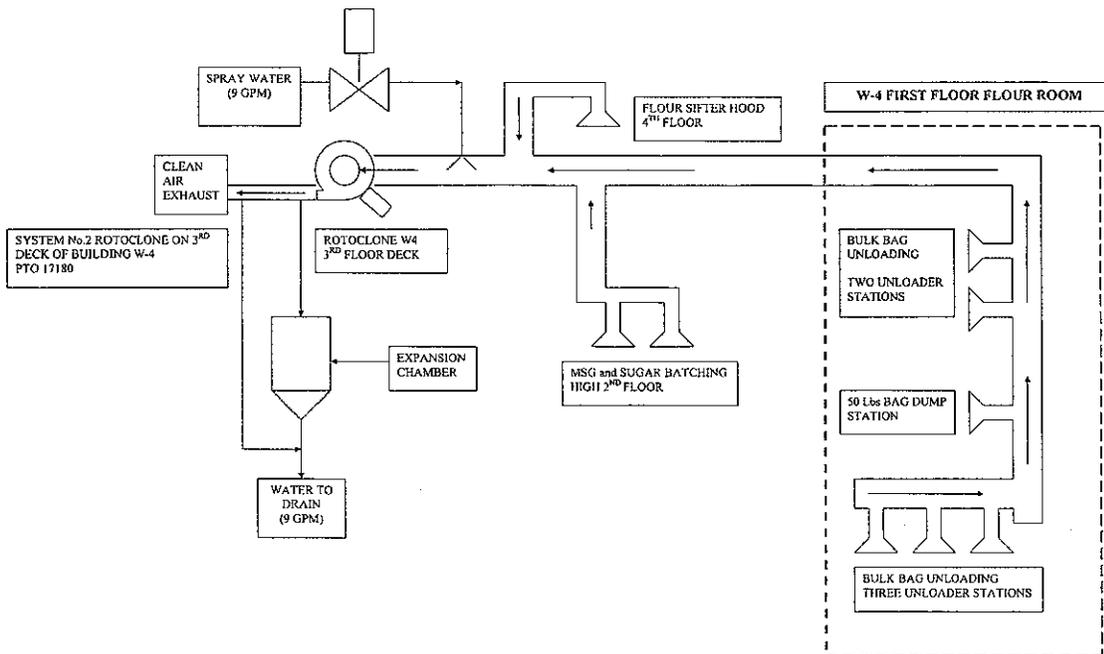
A/C 23336 - APC Rotoclone No. 1 (previously P/O 16888):

Manufacturer: American Air Filter (AAF)
Type: "W"
Size: 27
Capacity: 16,000 ACFM
Horsepower: 40
Venting: 6 flour mixers
1 allergen scale table

FLOW DIAGRAM:

A/C 23325 – APC Rotoclone No. 2 (previously P/O 17180):

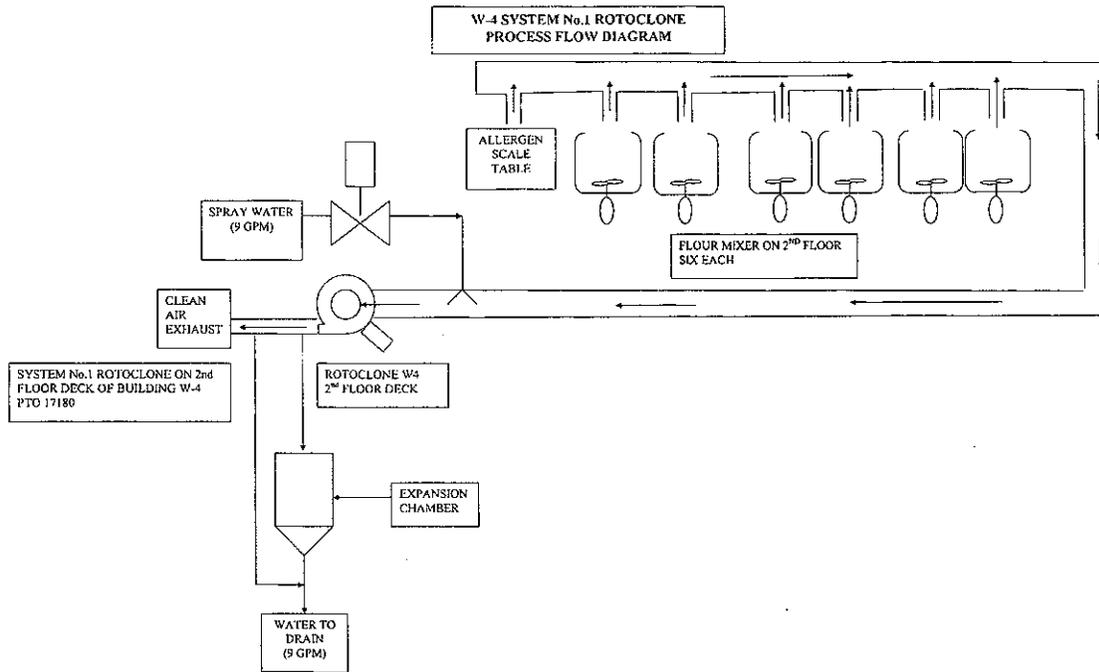
FIGURE 1: FLOW DIAGRAM SYSTEM No.2 ROTOCLONE PROCESSING



A/C 23336 - APC Rotoclone No. 1 (previously P/O 16888):

FIGURE 2:

FLOW DIAGRAM SYSTEM No.1 ROTOCLONE PROCESSING



ROTOCLONE_SYS1 2/16/2012 8:30 AM

PROCESS RATE/FUEL USAGE:

Each rotoclone has a maximum capacity of 16,000 ACFM.

OPERATING SCHEDULE:

Each rotoclone is permitted to operate 24 hours/day, 92 days/quarter and 365 days/year.

CONTROL EQUIPMENT EVALUATION:

The manufacturer guarantees a particulate removal efficiency ranging from 95% for PM5 to better than 99.5% for PM15 and larger for each rotoclone.

EMISSIONS CALCULATIONS:

1. HISTORIC POTENTIAL TO EMIT:

Historic Potential to Emit from P/O 17180:

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.

Historic Potential to Emit from P/O 16888:

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. PROPOSED POTENTIAL TO EMIT:

Proposed Potential to Emit from A/C 23325:

Pollutant	Emission Factor (A) (grains/dscf)	Proposed Potential to Emit (B)		
		lb/day	lb/quarter	lb/year
PM10	0.002	6.6	606	2,409
PM2.5	0.002	6.6	606	2,409
GHG	0	0 tons/day	0 tons/quarter	0 tons/year

- (A) Emission factor for PM10 and PM2.5 (assuming that all PM is PM10 and PM2.5) assumes 0.2 grains/dscf inlet concentration and 99% control. GHG emission factor is the CO₂e emission factor as per Tables C1 and C2 of Subpart C of EPA's *Mandatory Reporting for Greenhouse Gases* rule (40 CFR, Part 98).
(B) Emissions based on maximum capacity of 16,000 CFM and 24 hours/day, 92 days/quarter and 365 days/year of operation.

Proposed Potential to Emit from A/C 23336:

Pollutant	Emission Factor (A) (grains/dscf)	Proposed Potential to Emit (B)		
		lb/day	lb/quarter	lb/year
PM10	0.002	6.6	606	2,409
PM2.5	0.002	6.6	606	2,409
GHG	0	0 tons/day	0 tons/quarter	0 tons/year

- (A) Emission factor for PM10 and PM2.5 (assuming that all PM is PM10 and PM2.5) assumes 0.2 grains/dscf inlet concentration and 99% control. GHG emission factor is the CO₂e emission factor as per Tables C1 and C2 of Subpart C of EPA's *Mandatory Reporting for Greenhouse Gases* rule (40 CFR, Part 98).
(B) Emissions based on maximum capacity of 16,000 CFM and 24 hours/day, 92 days/quarter and 365 days/year of operation.

3. CALCULATION OF BACT TRIGGER:

BACT is applied to any new emissions unit or modification of an existing emissions unit. Since this is a replacement of air pollution control equipment with new control equipment and the emissions of the new equipment are equal to those from the original equipment, this change is not considered a modification for the purposes of New Source Review (Rule 202, Section 225.3.e). However, when determining emissions increases for BACT purposes for replacement air pollution control equipment, emissions must be calculated as the daily Potential to emit minus the historic Potential to emit (as per Rule 202, Section 413.2).

Although each APC rotoclone was not permitted with a daily historic Potential to emit, each rotoclone was permitted with a quarterly historic Potential to emit that was based on the rotoclone operating at maximum capacity and 24 hours/day. Therefore, the daily historic Potential to emit may be calculated from the quarterly historic Potential to emit for BACT trigger purposes.

NEI = (DPE – DHPE)

DPE (BACT)= Daily Potential Emissions

DHPE = Daily Historic Potential Emissions or Daily Actual Emissions if no enforceable daily emissions limitation is present prior to modification.

Calculation of BACT Trigger for A/C 23325:

Pollutant	DPE (BACT) (lb/day)	DHPE (lb/day)	NEI (lb/day)	BACT Trigger Level (lb/day)	Is BACT Required?
VOC	0	0	0	>0	No
NOx	0	0	0	>0	No
SOx	0	0	0	>0	No
PM10	6.6	6.6 (A)	0	>0	No
PM2.5	6.6	6.6 (B)	0	>0	No
CO	0	0	0	>550	No
LEAD	0	0	0	>0	No

(A) Based on the quarterly historic Potential to emit and operating at maximum capacity and 24 hours/day.

(B) Although the historic potential emissions only calculated PM10, it is assumed that all PM is PM10 and PM2.5. Therefore, the historic PM10 serves as a surrogate for PM2.5.

Calculation of BACT Trigger for A/C 23336:

Pollutant	DPE (BACT) (lb/day)	DHPE (lb/day)	NEI (lb/day)	BACT Trigger Level (lb/day)	Is BACT Required?
VOC	0	0	0	>0	No
NOx	0	0	0	>0	No
SOx	0	0	0	>0	No
PM10	6.6	6.6 (A)	0	>0	No
PM2.5	6.6	6.6 (B)	0	>0	No
CO	0	0	0	>550	No
LEAD	0	0	0	>0	No

- (A) Based on the quarterly historic Potential to emit and operating at maximum capacity and 24 hours/day.
(B) Although the historic potential emissions only calculated PM10, it is assumed that all PM is PM10 and PM2.5. Therefore, the historic PM10 serves as a surrogate for PM2.5.

4. CALCULATION OF OFFSET TRIGGER FOR VOC AND NOx:

Permit No.	Emissions Unit	Stationary Source Potential to Emit (lb/quarter)	
		VOC	NOx
P/O 14634	IC Engine Standby	68	840
P/O 16888	APC Rotoclone No. 1	Replaced by A/C 23336	
P/O 17180	APC Rotoclone No. 2	Replaced by A/C 23325	
P/O 18710	APC Rotoclone No. 3	0	0
P/O 20160	Boiler No. 1	2,539 (A)	41,000 (B)
P/O 20161	Boiler No. 2		
P/O 20936	Boiler No. 3		
P/O 20937	Boiler No. 4		
P/O 21074	IC Engine Standby	127	622
P/O 22542	Inkjet Printing Operation	1500	0
A/C 23325	APC Rotoclone No. 2	0	0
A/C 23336	APC Rotoclone No. 1	0	0
Total		4,234	42,462
Trigger Level		≥5,000	≥5,000

- (A) Based on previously permitted daily combined limit of 27.6 lb/day VOC and operating on natural gas for 92 days/quarter for all four boilers combined.
(B) Varies by calendar quarter combined limits on natural gas firing only. This is the maximum quarter.

5. CALCULATION OF OFFSET TRIGGER FOR SO_x, PM10 AND CO:

Permit No.	Emissions Unit	Stationary Source Cumulative Emission Increase Since 01-01-77 (lb/quarter)		
		SO _x	PM10	CO
P/O 14634	IC Engine Standby	10	60	182
P/O 16888	APC Rotoclone No. 1	Replaced by A/C 23336		
P/O 17180	APC Rotoclone No. 2	Replaced by A/C 23325		
P/O 18710	APC Rotoclone No. 3	0	114	0
P/O 20160	Boiler No. 1	552 (A)	4,545 (B)	52,992 (C)
P/O 20161	Boiler No. 2			
P/O 20936	Boiler No. 3			
P/O 20937	Boiler No. 4			
P/O 21074	IC Engine Standby	21	19	330
P/O 22542	Inkjet Printing Operation	0	0	0
A/C 23325	APC Rotoclone No. 2	0	606	0
A/C 23336	APC Rotoclone No. 1	0	606	0
Total		583	5,950	53,504
Trigger Level		≥13,650	≥7,300	≥49,500

- (A) Based on previously permitted daily combined limit of 6 lb/day SO₂ and operating on natural gas for 92 days/quarter for all four boilers combined.
- (B) Based on previously permitted daily combined limit of 49.4 lb/day PM10 and operating on natural gas for 92 days/quarter for all four boilers combined.
- (C) Based on previously permitted daily combined limit of 576 lb/day CO and operating on natural gas for 92 days/quarter for all four boilers combined.

6. CALCULATION OF OFFSET TRIGGER FOR PM2.5:

Permit No.	Emissions Unit	Stationary Source Cumulative Emission Increase Since 01-01-77 (tons/year)
		PM2.5 (A)
P/O 14634	IC Engine Standby	0.03
P/O 16888	APC Rotoclone No. 1	Replaced by A/C 23336
P/O 17180	APC Rotoclone No. 2	Replaced by A/C 23325
P/O 18710	APC Rotoclone No. 3	0.9
P/O 20160	Boiler No. 1	9.09 (B)
P/O 20161	Boiler No. 2	
P/O 20936	Boiler No. 3	
P/O 20937	Boiler No. 4	
P/O 21074	IC Engine Standby	0.01
P/O 22542	Inkjet Printing Operation	0
A/C 23325	APC Rotoclone No. 2	1.2
A/C 23336	APC Rotoclone No. 1	1.2
Total		12.43
Trigger Level		≥15

(A) Assuming all PM is PM10 and PM2.5.

(B) Based on previously permitted daily combined limit of 49.4 lb/day PM10 and operating on natural gas for 92 days/quarter and 4 quarters/year for all four boilers combined.

7. CALCULATION OF EMISSION OFFSETS FOR VOC AND NOx:

The offset threshold for NOx is exceeded. This replacement does not result in any NOx emissions. Offsets have been previously addressed in prior permitting actions. Therefore, no offsets are required for NOx.

Emission offsets are not required for VOC because emissions are below the offset threshold.

8. CALCULATION OF EMISSION OFFSETS FOR SOx, PM10, PM2.5, AND CO:

The offset threshold for CO is exceeded. These replacements do not result in any CO emissions. Offsets have been previously addressed in prior permitting actions. Since each new rotoclone is a replacement of air pollution control equipment with new control equipment and the emissions of the new equipment are equal to those from the original equipment, this change is not considered a modification for the purposes of New Source Review (Rule 202, Section 225.3.e). Therefore, no offsets are required for CO.

Emission offsets are not required for SOx, PM10 or PM2.5 because emissions are below the offset threshold.

offset threshold.

COMPLIANCE WITH RULES AND REGULATIONS:

1. AB 3205 COMPLIANCE:

The proposed project is not located within 1,000 feet from the outer boundary of any K-12 schools. Therefore the school public notice requirements of CA Health & Safety Code §42301.6 do not apply.

2. NEW SOURCE REVIEW COMPLIANCE:

The following table shows the calculated major modification levels for CSSC and the U.S. EPA major modification applicability levels. The calculation of the CSSC major modification levels includes emissions from the current permitting action and all increases in emissions that have occurred at the facility in the prior 5 years. In order to evaluate the source on a worst-case scenario, permitting actions that resulted in an emission decrease will not be considered.

The following table shows all permitting actions at CSSC since June 2007 (prior 5 years to this permitting action, excluding those that resulted in a net emissions decrease).

Date of Authority to Construct	Permit No.	Emissions Unit	Emissions Change (lb/year)					
			VOC	NOx	SOx	PM10	PM2.5 (A)	CO
06-05-2007	20160	Boiler No. 1	1,300	0	24	2,624	2,624	12,808
06-05-2007	20161	Boiler No. 2	1,300	0	24	2,624	2,624	12,808
06-16-2008	20936	Boiler No. 3	0	0	0	0	0	0
06-16-2008	20937	Boiler No. 4	0	0	0	0	0	0
06-16-2008	21074	IC Engine Emergency Use	127	622	21	19	19	330
01-18-2011 (B)	22542	Inkjet Printing Operation	6,000	0	0	0	0	0
~March 2012	23325	APC Rotoclone No. 2	0	0	0	0	0	0
~March 2012	23336	APC Rotoclone No. 1	0	0	0	0	0	0
5 Year Total			8,727	622	69	5,267	5,267	25,946
Major Modification Applicability Levels (lb/year)			50,000	50,000	80,000	30,000	20,000	200,000

(A) Assuming all PM is PM10 and PM2.5.

(B) For inkjet printing operation, date of Authority to Construct is date of Permit to Operate since equipment was treated as a previously permit-exempt emissions unit that lost exemption.

The calculation of major modification levels for CSSC is much less than U.S. EPA major

Rule 202 - New Source Review

Section 113 – Exemption - Notification Requirements The potential to emit from each emissions unit does not meet or exceed the following levels requiring public noticing pursuant to the requirements of Sections 405, 406, 407 and 409.2:

<u>Pollutant</u>	<u>lb/qtr</u>
VOC	5,000
NOx	5,000
SOx	13,650
PM10	7,300
PM2.5	10 TPY
CO	49,500

Section 301 – Best Available Control Technology The proposed potential to emit from the APC rotoclones do not exceed the BACT threshold for PM10 or PM2.5 as specified in Section 301.1 and below, while the emissions of all other criteria pollutants from the project are below the BACT trigger level specified in this section. Therefore, BACT will not be required for PM10 or PM2.5.

<u>Pollutant</u>	<u>lb/day</u>
VOC	0
NOx	0
SOx	0
PM10	0
PM2.5	0
CO	550
Lead	3.3

Section 302 – Offsets The offset thresholds for NOx and CO are exceeded, while the emissions of all other criteria pollutants are below the offset thresholds specified in this section. These replacements do not result in any NOx or CO emissions. Offsets have been previously addressed in prior permitting actions. Each emissions unit was in place prior to 1977 and this replacement does not result in an increase in the potential to emit for PM10. Since this is a replacement of air pollution control equipment with the new control equipment and the emissions of the new equipment are equal to those from the original equipment, this change is not considered a modification for the purposes of New Source Review (Rule 202, Section 225.3.e). Therefore, offsets are not required for NOx or CO.

<u>Pollutant</u>	<u>lb/qtr</u>
VOC	5,000
NOx	5,000
SOx	13,650
PM10	7,300
PM2.5	15 TPY
CO	49,500

Section 307 – Denial, Failure to Meet CEQA The SMAQMD utilizes *Guide to Air Quality Assessment in Sacramento County, SMAQMD, July 2004* as guide during the initial study phase of a proposed project to determine the level of review necessary under CEQA (referenced in the IC Engine Policy manual last updated March 2008).

- a. VOC and NO_x – The average daily emissions are 0.0 lb/day of NO_x and 0.0 lb/day of VOC. These levels are below the trigger levels of 65 lb/day.
- b. Other pollutants – The project does not result in operational emissions that could lead to violations of any applicable state Ambient Air Quality Standards.
- c. Toxic Air Contaminants – T-BACT requirements are not triggered for this project because the facility-wide excess cancer risk is less than 1 in a million and the hazard index is less than one.
- d. Cumulative TACs – The project is not located near any sources identified in the AB2588 program which result in a cumulative risk greater than 10 in one million.

As the project does not exceed any of the criteria above, the project does not require further CEQA review.

Section 404 – Enhanced New Source Review Replacement of the old system no. 1 & 2 APC rotoclones are not considered a Significant Title V Modification since the increase in potential to emit from the replacement when aggregated with all other increases in potential to emit over the period of five consecutive years before the application (see table above under the NEW SOURCE REVIEW COMPLIANCE section) does not exceed the trigger levels specified in Rule 207, Section 233.6. Therefore, this permit action is not subject to EPA and public review in accordance with Rule 207, Sections 401-408.

Sections 405-408 – CARB, EPA, and Public Notification The emissions from this emissions unit does not exceed the exemption level specified in Rule 202, Section 113. Therefore, a CARB, EPA, and public review are unnecessary.

Rule 207 – Title V Federal Operating Permit Program

Section 301.5 – Application Submittal for Minor Title V Permit Modifications CSSC shall submit a Title V permit application for minor Title V permit modification after issuance of the Authority to Construct and before commencing operation associated with this Minor Title V permit modification.

Sections 401-408 – EPA and Public Notification CSSC shall be subject to EPA and public review upon submittal of the Minor Title V permit modification applications.

3. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) COMPLIANCE:

CSSC is a major PSD source for PM2.5. A PSD analysis is not required because this permit action does not result in a new major stationary source or a major modification as defined in 40 CFR 52.21(b).

A source or modification triggers PSD if:

- Its potential to emit any one pollutant is greater than 100 tons/year (if one of the 28 selected industrial categories, including utility plants, steel plants, refineries, boilers >250 MMBtu/hr heat input) or greater than 250 tons/year (all other categories); and
- The project's contemporaneous emissions increase and net emissions increase for any pollutant is greater than the significance levels listed below:

Pollutant	Level of Significance (Tons/Yr)
CO	100
NOx	40
SOx	40
PM	25
PM10	15
PM2.5	10 (PM2.5) or 40 (SO2) or 40(NO)
Ozone	40 of NOx or VOCs
Lead	0.6
Fluorides	3
Sulfuric acid mist	7
H ₂ S	10
Total reduced sulfur (including H ₂ S)	10
Reduced sulfur compounds (including H ₂ S)	10
Greenhouse Gases (CO ₂ e)	75,000

A more detailed PSD analysis is not required because the contemporaneous emissions increases for all pollutants at the facility do not exceed any of the significance levels shown above.

4. PROHIBITORY RULES COMPLIANCE:

Rule 401 – Ringelmann Chart

Visible emissions from each rotoclone is expected to comply with the Ringelmann No. 1 or 20% opacity requirement of this rule.

Rule 404 – Particulate Matter

Total particulate matter emissions from each APC rotoclone is expected to comply with the 0.1 grains/dscf concentration limitation of this rule, as calculated below:

$$\text{Grain Loading} = \frac{[0.27 \text{ lb/hr}][7,000 \text{ gr/lb}][1 \text{ hr}/60 \text{ min}]}{[16,000 \text{ CFM}]} = 0.00197 \text{ gr/cf}$$

5. **NEW SOURCE PERFORMANCE STANDARDS (NSPS) COMPLIANCE:** The list of all adopted New Source Performance Standards as listed in 40 CFR 60 (<http://www.epa.gov/ttn/atw/area/70list.pdf>) were reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no NSPSs applicable to this source category.
6. **NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) COMPLIANCE:**
- NESHAPs under 40 CFR, Part 61: The list of all adopted National Emission Standards for Hazardous Air Pollutants (<http://yosemite.epa.gov/r9/r9nspns.nsf/ViewStandards?ReadForm&Part=61>) were reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no 40 CFR, Part 61 NESHAPs applicable to this source category.
- NESHAPs under 40 CFR, Part 63: The list of all adopted National Emission Standards for Hazardous Air Pollutants (<http://yosemite.epa.gov/r9/r9nspns.nsf/ViewStandards?ReadForm&Part=63>) were reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no 40 CFR, Part 63 NESHAPs (MACT standards) applicable to this source category.
7. **ATCM COMPLIANCE:** The list of all adopted Airborne Toxic Control Measures (<http://www.arb.ca.gov/toxics/atcm/atcm.htm>) was reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no ATCMs applicable to this source category.

RECOMMENDATION:

The APC rotoclone no. 1 and 2 should comply with all applicable District rules and regulations. An Authority to Construct an APC rotoclone no. 1 and 2 should be issued to Campbell Soup Supply Company, LLC with the following conditions.

Refer to conditions in Authority to Construct Nos. 23325 & 23336

REVIEWED BY: Ben F. Hall DATE: 3-6-12

Emission Calculations for Greenhouse Gases

GHG Emission Calculations for Permit Number:

23325

Step 1.

Select a Fuel from the pull-down menu:

Natural Gas

Step 2.

Enter Fuel Consumption in (select from the pull-down menu):

MCF

Step 3.

Enter Fuel Usage in MCF

Potential to Emit for CO2e			
Period	Fuel Usage (MCF)	CO2e Emissions (in short tons)	Units
Daily	0	0.0	tons/day
1st Qtr"	0	0	tons/quarter
2nd Qtr	0	0	tons/quarter
3rd Qtr	0	0	tons/quarter
4th Qtr	0	0	tons/quarter
Annual	0	0	tons/year

Emission Calculations for Greenhouse Gases

GHG Emission Calculations for Permit Number:

23336

Step 1.

Select a Fuel from the pull-down menu:

Natural Gas

Step 2.

Enter Fuel Consumption in (select from the pull-down menu):

MCF

Step 3.

Enter Fuel Usage in MCF

Potential to Emit for CO2e			
Period	Fuel Usage (MCF)	CO2e Emissions (in short tons)	Units
Daily	0	0.0	tons/day
1st Qtr"	0	0	tons/quarter
2nd Qtr	0	0	tons/quarter
3rd Qtr	0	0	tons/quarter
4th Qtr	0	0	tons/quarter
Annual	0	0	tons/year

AIR QUALITY

MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT EVALUATION

APPLICATION NO.:	<u>23441</u>
DATE:	<u>July 2, 2012</u>
ISSUING ENGINEER:	<u>Michelle Joe</u>

FACILITY NAME: CAMPBELL SOUP SUPPLY COMPANY, LLC**LOCATION:** 6200 FRANKLIN BLVD., SACRAMENTO, CA 95824**PROPOSAL:** OBTAIN AN AUTHORITY TO CONSTRUCT/PERMIT TO OPERATE FOR A NEW APC ROTOCLONE TO REPLACE ROTOCLONE NO. 3 (P/O 18710).**INTRODUCTION:**

Campbell Soup Supply Company, LLC (CSSC) is a canned food and juice processing facility, which includes the manufacturing processes of ingredient handling and processing, ingredient blending, container filling and closing, heat sterilization of canned products, labeling, packaging, and warehousing. To control salt dust generated during pneumatic off-loading of rock salt into storage tanks, CSSC is proposing to replace the old rotoclone no. 3 (previously permitted under P/O 18710) as it has exceeded its useful life.

The new rotoclone is an exact replacement of the existing rotoclone, but will be constructed of 304 stainless steel rather than carbon steel. The rotoclone is a combination centrifugal blower and dynamic wet scrubber. A water spray at the inlet of the rotoclone wets particulates contained in the air stream. The air-dust-slurry mixture is drawn through the rotoclone where the dust slurry is separated from the air. The scrubbed, clean air is exhausted to the atmosphere. Water, dust slurry, and a secondary air stream are discharged tangentially from the rotoclone housing through an expansion chamber attached to the rotoclone. The water and dust slurry flow to the drain connection at the bottom of the expansion chamber to the sewer and secondary air is exhausted through the top of the expansion chamber.

The estimated startup date for the new rotoclone and modified ductwork is July 31, 2012.

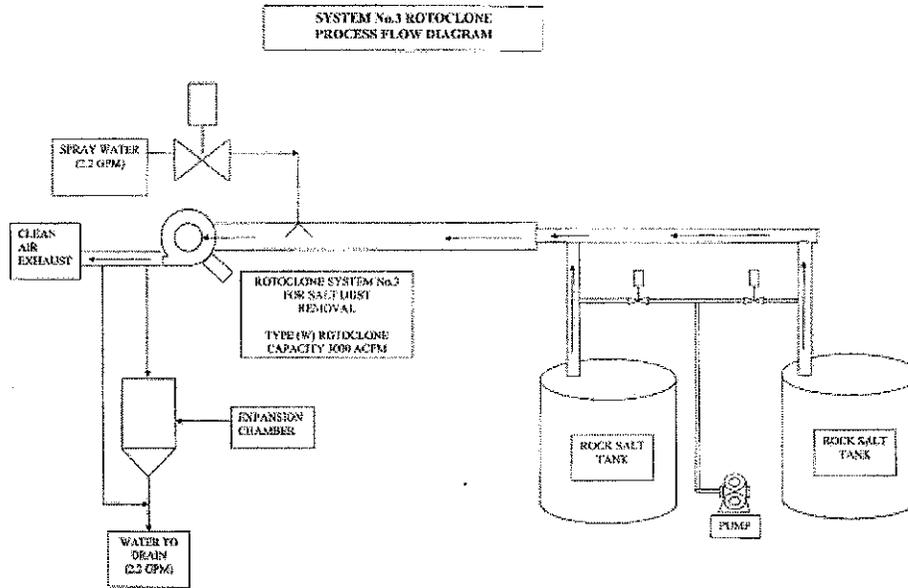
EQUIPMENT DESCRIPTION:**A/C 23441 – APC Rotoclone No. 3 (previously P/O 18710):**

Manufacturer:	American Air Filter (AAF)
Type:	“W”
Size:	12
Capacity:	3,000 ACFM
Horsepower:	10
Venting:	2 rock salt storage silos

FLOW DIAGRAM:

A/C 23441 – APC Rotoclone No. 3 (previously P/O 18710):

FIGURE 3: FLOW DIAGRAM SYSTEM No.3 ROTOCLONE PROCESSING



ROTOCLONE_SYNS3 4/28/2012 11:55 AM

PROCESS RATE/FUEL USAGE:

The rotoclone has a maximum capacity of 3,000 ACFM.

OPERATING SCHEDULE:

The rotoclone is permitted to operate 24 hours/day, 92 days/quarter and 365 days/year.

CONTROL EQUIPMENT EVALUATION:

The manufacturer guarantees a particulate removal efficiency ranging from 95% for PM5 to better than 99.5% for PM15 and larger.

EMISSIONS CALCULATIONS:

1. HISTORIC POTENTIAL TO EMIT:

Historic Potential to Emit from P/O 18710:

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 ACFM), 24 hours/day and 92 days/quarter.

2. PROPOSED POTENTIAL TO EMIT:

During the original permitting of this rotoclone under P/O 18710, CSSC had proposed an uncontrolled 0.000374 lb/cf (2.618 grains/dscf) PM10 inlet concentration, 99.5% control efficiency and 4 hours/week and 208 hours/year operation. However, the rotoclone was instead permitted similar to rotoclone no. 1 & 2's potential to emit, which was based on CSSC's proposal of an uncontrolled 0.2 grains/dscf PM10 inlet concentration and 99% control efficiency. Since both PM10 emission factors (2.618 grains/dscf and 0.2 grains/dscf) were proposed by CSSC originally, CSSC was allowed to select the original 2.618 grains/dscf PM10 inlet concentration and 99.5% control to correct the potential to emit for this replacement application (see Appendix A – Rotoclone No. 3 PM10 Emission Factor Discussion).

Pollutant	Emission Factor (A) (grains/dscf)	Proposed Potential to Emit (B)		
		lb/day	lb/quarter	lb/year
PM10	0.01309	8.1	743	2,949
PM2.5	0.01309	8.1	743	2,949
GHG	0	0 tons/day	0 tons/quarter	0 tons/year

- (A) Emission factor for PM10 and PM2.5 (assuming that all PM is PM10 and PM2.5) assumes 2.618 grains/dscf inlet concentration and 99.5% control. GHG emission factor is the CO₂e emission factor as per Tables C1 and C2 of Subpart C of EPA's *Mandatory Reporting for Greenhouse Gases* rule (40 CFR, Part 98).
(B) Emissions based on maximum capacity of 3,000 CFM and 24 hours/day, 92 days/quarter and 365 days/year of operation.

3. CALCULATION OF BACT TRIGGER:

BACT is applied to any new emissions unit or modification of an existing emissions unit. Since this is a replacement of air pollution control equipment with new control equipment and the emissions of the new equipment are equal to those from the original equipment, this change is not considered a modification for the purposes of New Source Review (Rule 202, Section 225.3.e). However, when determining emissions increases for BACT purposes for replacement air pollution control equipment, emissions must be calculated as the daily Potential to emit minus the historic Potential to emit (as per Rule 202, Section 413.2).

Although the APC rotoclone was not permitted with a daily historic Potential to emit, the rotoclone was permitted with a quarterly historic Potential to emit that was based on the rotoclone operating at maximum capacity and 24 hours/day. Therefore, the daily historic Potential to emit may be calculated from the quarterly historic Potential to emit for BACT trigger purposes.

NEI = (DPE – DHPE)

DPE (BACT) = Daily Potential Emissions

DHPE = Daily Historic Potential Emissions or Daily Actual Emissions if no enforceable daily emissions limitation is present prior to modification.

Pollutant	DPE (BACT) (lb/day)	DHPE (lb/day)	NEI (lb/day)	BACT Trigger Level (lb/day)	Is BACT Required?
VOC	0	0	0	>0	No
NOx	0	0	0	>0	No
SOx	0	0	0	>0	No
PM10	8.1	8.1 (A)	0	>0	No
PM2.5	8.1	8.1 (B)	0	>0	No
CO	0	0	0	>550	No
LEAD	0	0	0	>0	No

(A) Based on the quarterly historic Potential to emit and operating at maximum capacity and 24 hours/day. Note: Potential to Emit calculations were incorrectly calculated in the previous evaluation for P/O 18710, so the corrected quarterly emissions were used in the calculation of NEI here.

(B) Although the historic potential emissions only calculated PM10, it is assumed that all PM is PM10 and PM2.5. Therefore, the historic PM10 serves as a surrogate for PM2.5.

4. CALCULATION OF OFFSET TRIGGER FOR VOC AND NOx:

Permit No.	Emissions Unit	Stationary Source Potential to Emit (lb/quarter)	
		VOC	NOx
P/O 14634	IC Engine Standby	68	840
P/O 16888	APC Rotoclone No. 1	Replaced by A/C 23336	
P/O 17180	APC Rotoclone No. 2	Replaced by A/C 23325	
P/O 18710	APC Rotoclone No. 3	Replaced by A/C 23441	
P/O 20160	Boiler No. 1	2,539 (A)	41,000 (B)
P/O 20161	Boiler No. 2		
P/O 20936	Boiler No. 3		
P/O 20937	Boiler No. 4		
P/O 21074	IC Engine Standby	127	622
P/O 22542	Inkjet Printing Operation	1500	0
A/C 23325	APC Rotoclone No. 2	0	0
A/C 23336	APC Rotoclone No. 1	0	0
A/C 23441	APC Rotoclone No. 3	0	0
Total		4,234	42,462
Trigger Level		≥5,000	≥5,000

- (A) Based on previously permitted daily combined limit of 27.6 lb/day VOC and operating on natural gas for 92 days/quarter for all four boilers combined.
- (B) Varies by calendar quarter combined limits on natural gas firing only. This is the maximum quarter.

5. CALCULATION OF OFFSET TRIGGER FOR SO_x, PM₁₀ AND CO:

Permit No.	Emissions Unit	Stationary Source Cumulative Emission Increase Since 01-01-77 (lb/quarter)		
		SO _x	PM ₁₀	CO
P/O 14634	IC Engine Standby	10	60	182
P/O 16888	APC Rotoclone No. 1	Replaced by A/C 23336		
P/O 17180	APC Rotoclone No. 2	Replaced by A/C 23325		
P/O 18710	APC Rotoclone No. 3	Replaced by A/C 23441		
P/O 20160	Boiler No. 1	552 (A)	4,545 (B)	52,992 (C)
P/O 20161	Boiler No. 2			
P/O 20936	Boiler No. 3			
P/O 20937	Boiler No. 4			
P/O 21074	IC Engine Standby	21	19	330
P/O 22542	Inkjet Printing Operation	0	0	0
A/C 23325	APC Rotoclone No. 2	0	606	0
A/C 23336	APC Rotoclone No. 1	0	606	0
A/C 23441	APC Rotoclone No. 3	0	743	0
Total		583	6,693	53,504
Trigger Level		≥13,650	≥7,300	≥49,500

- (A) Based on previously permitted daily combined limit of 6 lb/day SO₂ and operating on natural gas for 92 days/quarter for all four boilers combined.
- (B) Based on previously permitted daily combined limit of 49.4 lb/day PM₁₀ and operating on natural gas for 92 days/quarter for all four boilers combined.
- (C) Based on previously permitted daily combined limit of 576 lb/day CO and operating on natural gas for 92 days/quarter for all four boilers combined.

6. CALCULATION OF OFFSET TRIGGER FOR PM2.5:

Permit No.	Emissions Unit	Stationary Source Cumulative Emission Increase Since 01-01-77 (tons/year)
		PM2.5 (A)
P/O 14634	IC Engine Standby	0.03
P/O 16888	APC Rotoclone No. 1	Replaced by A/C 23336
P/O 17180	APC Rotoclone No. 2	Replaced by A/C 23325
P/O 18710	APC Rotoclone No. 3	Replaced by A/C 23441
P/O 20160	Boiler No. 1	9.09 (B)
P/O 20161	Boiler No. 2	
P/O 20936	Boiler No. 3	
P/O 20937	Boiler No. 4	
P/O 21074	IC Engine Standby	0.01
P/O 22542	Inkjet Printing Operation	0
A/C 23325	APC Rotoclone No. 2	1.2
A/C 23336	APC Rotoclone No. 1	1.2
A/C 23441	APC Rotoclone No. 3	0.4
Total		12.83
Trigger Level		≥15

(A) Assuming all PM is PM10 and PM2.5.

(B) Based on previously permitted daily combined limit of 49.4 lb/day PM10 and operating on natural gas for 92 days/quarter and 4 quarters/year for all four boilers combined.

7. CALCULATION OF EMISSION OFFSETS FOR VOC AND NO_x:

The offset threshold for NO_x is exceeded. This replacement does not result in any NO_x emissions. Offsets have been previously addressed in prior permitting actions. Therefore, no offsets are required for NO_x.

Emission offsets are not required for VOC because emissions are below the offset threshold.

8. CALCULATION OF EMISSION OFFSETS FOR SO_x, PM10, PM2.5, AND CO:

The offset threshold for CO is exceeded. This replacement does not result in any CO emissions. Offsets have been previously addressed in prior permitting actions. Since the new rotoclone is a replacement of original air pollution control equipment with new control equipment and the emissions of the new equipment are equal to those from the original equipment, this change is not considered a modification for the purposes of New Source Review (Rule 202, Section 225.3.e). Therefore, no offsets are required for CO.

Emission offsets are not required for SO_x, PM10 or PM2.5 because emissions are below the offset threshold.

COMPLIANCE WITH RULES AND REGULATIONS:

1. AB 3205 COMPLIANCE:

The proposed project is not located within 1,000 feet from the outer boundary of any K-12 schools. Therefore the school public notice requirements of CA Health & Safety Code §42301.6 do not apply.

2. NEW SOURCE REVIEW COMPLIANCE:

The following table shows the calculated major modification levels for CSSC and the U.S. EPA major modification applicability levels. The calculation of the CSSC major modification levels includes emissions from the current permitting action and all increases in emissions that have occurred at the facility in the prior 5 years. In order to evaluate the source on a worst-case scenario, permitting actions that resulted in an emission decrease will not be considered.

The following table shows all permitting actions at CSSC since June 2007 (prior 5 years to this permitting action, excluding those that resulted in a net emissions decrease).

Date of Authority to Construct	Permit No.	Emissions Unit	Emissions Change (lb/year)					
			VOC	NOx	SOx	PM10	PM2.5 (A)	CO
06-05-2007	20160	Boiler No. 1	1,300	0	24	2,624	2,624	12,808
06-05-2007	20161	Boiler No. 2	1,300	0	24	2,624	2,624	12,808
06-16-2008	20936	Boiler No. 3	0	0	0	0	0	0
06-16-2008	20937	Boiler No. 4	0	0	0	0	0	0
06-16-2008	21074	IC Engine Emergency Use	127	622	21	19	19	330
01-18-2011 (B)	22542	Inkjet Printing Operation	6,000	0	0	0	0	0
~March 2012	23325	APC Rotoclone No. 2	0	0	0	0	0	0
~March 2012	23336	APC Rotoclone No. 1	0	0	0	0	0	0
~July 2012	23441	APC Rotoclone No. 3	0	0	0	0	0	0
5 Year Total			8,727	622	69	5,267	5,267	25,946
Major Modification Applicability Levels (lb/year)			50,000	50,000	80,000	30,000	20,000	200,000

(A) Assuming all PM is PM10 and PM2.5.

(B) For inkjet printing operation, date of Authority to Construct is date of Permit to Operate since equipment was treated as a previously permit-exempt emissions unit that lost exemption.

The calculation of major modification levels for CSSC is much less than U.S. EPA major modification applicability levels. Therefore, replacement of the old system no. 3 APC rotoclone is not considered a major modification.

Rule 202 - New Source Review

Section 113 – Exemption - Notification Requirements The potential to emit from the emissions unit does not meet or exceed the following levels requiring public noticing pursuant to the requirements of Sections 405, 406, 407 and 409.2:

<u>Pollutant</u>	<u>lb/qtr</u>
VOC	5,000
NOx	5,000
SOx	13,650
PM10	7,300
PM2.5	10 TPY
CO	49,500

Section 301 – Best Available Control Technology The proposed potential to emit from the APC rotoclone does not exceed the BACT threshold for PM10 or PM2.5 as specified in Section 301.1 and below, while the emissions of all other criteria pollutants from the project are below the BACT trigger level specified in this section. Therefore, BACT will not be required for PM10 or PM2.5.

<u>Pollutant</u>	<u>lb/day</u>
VOC	0
NOx	0
SOx	0
PM10	0
PM2.5	0
CO	550
Lead	3.3

Section 302 – Offsets The offset thresholds for NOx and CO are exceeded, while the emissions of all other criteria pollutants are below the offset thresholds specified in this section. This replacement does not result in any NOx or CO emissions. Offsets have been previously addressed in prior permitting actions. This replacement does not result in an increase in the potential to emit for PM10. Since this is a replacement of air pollution control equipment with the new control equipment and the emissions of the new equipment are equal to those from the original equipment, this change is not considered a modification for the purposes of New Source Review (Rule 202, Section 225.3.e). Therefore, offsets are not required for NOx or CO.

<u>Pollutant</u>	<u>lb/qtr</u>
VOC	5,000
NOx	5,000
SOx	13,650
PM10	7,300
PM2.5	15 TPY
CO	49,500

Section 307 – Denial, Failure to Meet CEQA The SMAQMD utilizes Guide to Air Quality Assessment in Sacramento County, SMAQMD, July 2004 as guide during the initial study phase of a proposed project to determine the level of review necessary under CEQA (referenced in the IC Engine Policy manual last updated March 2008).

- a. VOC and NOx – The average daily emissions are 0.0 lb/day of NOx and 0.0 lb/day of VOC. These levels are below the trigger levels of 65 lb/day.
- b. Other pollutants – The project does not result in operational emissions that could lead to violations of any applicable state Ambient Air Quality Standards.
- c. Toxic Air Contaminants – T-BACT requirements are not triggered for this project because the facility-wide excess cancer risk is less than 1 in a million and the hazard index is less than one.
- d. Cumulative TACs – The project is not located near any sources identified in the AB2588 program which result in a cumulative risk greater than 10 in one million.

As the project does not exceed any of the criteria above, the project does not require further CEQA review.

Section 404 – Enhanced New Source Review Replacement of the old system no. 3 APC rotoclone is not considered a Significant Title V Modification since the increase in potential to emit from the replacement when aggregated with all other increases in potential to emit over the period of five consecutive years before the application (see table above under the NEW SOURCE REVIEW COMPLIANCE section) does not exceed the trigger levels specified in Rule 207, Section 233.6. Therefore, this permit action is not subject to EPA and public review in accordance with Rule 207, Sections 401-408.

Sections 405-408 – CARB, EPA, and Public Notification The emissions from this emissions unit does not exceed the exemption level specified in Rule 202, Section 113. Therefore, a CARB, EPA, and public review are unnecessary.

Rule 207 – Title V Federal Operating Permit Program

Section 301.5 – Application Submittal for Minor Title V Permit Modifications CSSC shall submit a Title V permit application for minor Title V permit modification after issuance of the Authority to Construct and before commencing operation associated with this Minor Title V permit modification.

Sections 401-408 – EPA and Public Notification CSSC shall be subject to EPA and public review upon submittal of the Minor Title V permit modification applications.

3. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) COMPLIANCE:

A PSD analysis is not required because this permit action does not result in a new major stationary source or a major modification as defined in 40 CFR 52.21(b).

A source or modification triggers PSD if:

- Its potential to emit any one pollutant is greater than 100 tons/year (if one of the 28 selected industrial categories, including utility plants, steel plants, refineries, boilers >250 MMBtu/hr heat input) or greater than 250 tons/year (all other categories); and
- The project's contemporaneous emissions increase and net emissions increase for any pollutant is greater than the significance levels listed below:

Pollutant	Level of Significance (Tons/Yr)
CO	100
NOx	40
SOx	40
PM	25
PM10	15
PM2.5	10 (PM2.5) or 40 (SO2) or 40(NO)
Ozone	40 of NOx or VOCs
Lead	0.6
Fluorides	3
Sulfuric acid mist	7
H ₂ S	10
Total reduced sulfur (including H ₂ S)	10
Reduced sulfur compounds (including H ₂ S)	10
Greenhouse Gases (CO ₂ e)	75,000

A more detailed PSD analysis is not required because the contemporaneous emissions increases for all pollutants at the facility do not exceed any of the significance levels shown above.

4. PROHIBITORY RULES COMPLIANCE:

Rule 401 – Ringelmann Chart

Visible emissions from the rotoclone is expected to comply with the Ringelmann No. 1 or 20% opacity requirement of this rule.

Rule 404 – Particulate Matter

Total particulate matter emissions from the APC rotoclone is expected to comply with the 0.1 grains/dscf concentration limitation of this rule, as calculated below:

$$\text{Grain Loading} = \frac{[0.34 \text{ lb/hr}][7,000 \text{ gr/lb}][1 \text{ hr}/60 \text{ min}]}{[3,000 \text{ CFM}]} = 0.0132 \text{ gr/cf}$$

5. **NEW SOURCE PERFORMANCE STANDARDS (NSPS) COMPLIANCE:** The list of all adopted New Source Performance Standards as listed in 40 CFR 60 (<http://www.epa.gov/ttn/atw/area/70list.pdf>) were reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no NSPSs applicable to this source category.

6. **NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) COMPLIANCE:**

NESHAPs under 40 CFR, Part 61: The list of all adopted National Emission Standards for Hazardous Air Pollutants (<http://yosemite.epa.gov/r9/r9nsps.nsf/ViewStandards?ReadForm&Part=61>) were reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no 40 CFR, Part 61 NESHAPs applicable to this source category.

NESHAPs under 40 CFR, Part 63: The list of all adopted National Emission Standards for Hazardous Air Pollutants (<http://yosemite.epa.gov/r9/r9nsps.nsf/ViewStandards?ReadForm&Part=63>) were reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no 40 CFR, Part 63 NESHAPs (MACT standards) applicable to this source category.

7. **ATCM COMPLIANCE:** The list of all adopted Airborne Toxic Control Measures (<http://www.arb.ca.gov/toxics/atcm/atcm.htm>) was reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no ATCMs applicable to this source category.

RECOMMENDATION:

The APC rotoclone no. 3 should comply with all applicable District rules and regulations. An Authority to Construct an APC rotoclone no. 3 should be issued to Campbell Soup Supply Company, LLC with the following conditions.

Refer to conditions in Authority to Construct No. 23441

REVIEWED BY:

Brian J. Hall

DATE:

7-2-12

Emission Calculations for Greenhouse Gases

GHG Emission Calculations for Permit Number:

23441

Step 1.

Select a Fuel from the pull-down menu:

Natural Gas

Step 2.

Enter Fuel Consumption in (select from the pull-down menu):

MCF

Step 3.

Enter Fuel Usage in MCF

Potential to Emit for CO2e			
Period	Fuel Usage (MCF)	CO2e Emissions (in short tons)	Units
Daily	0	0.0	tons/day
1st Qtr"	0	0	tons/quarter
2nd Qtr	0	0	tons/quarter
3rd Qtr	0	0	tons/quarter
4th Qtr	0	0	tons/quarter
Annual	0	0	tons/year

Appendix A
Rotoclone No. 3 PM10
Emission Factor
Discussion

MICHELLE JOE

From: MICHELLE JOE
Sent: Tuesday, March 06, 2012 10:27 AM
To: jennifer_cornes@campbellsoup.com
Subject: RE: Rotoclone No. 3 Emission Calculations
Attachments: AC23325 23336.pdf

Hi Jennifer,

I just spoke with my supervisor and received his approval on the attached Authorities to Construct for the Rotoclone No. 1 & 2 replacements (with the originals to follow in the mail).

As for Rotoclone No. 3's PM10 emission factor, my supervisor suggested that either:

1. We continue to use the currently permitted 0.002 gr/dscf PM10 emission factor and 24/7 operation, or
2. Use the originally proposed 0.01309 gr/cf PM10 emission factor and 24/7 operation in the replacement permit, while noting that the previously permitted PM10 emission factor was incorrect and therefore no emissions increase has occurred to require BACT.

SELECTED BY
CAMPBELL'S
IN APPLICATION.

In your application, please indicate which emission factor you would prefer, as both PM10 emission factors had been proposed by Campbell Soup originally.

Please let me know if you should have any other questions in the meantime.

Thank you,

Michelle Joe
Associate Air Quality Engineer
Sacramento Metropolitan AQMD
777 12th Street, 3rd Floor
Sacramento, CA 95814
mjoe@airquality.org

(916) 874-4853 Office
(916) 874-4899 Fax

From: MICHELLE JOE
Sent: Monday, March 05, 2012 4:31 PM
To: jennifer_cornes@campbellsoup.com
Subject: Rotoclone No. 3 Emission Calculations

Hi Jennifer,

Thank you for your time this morning in discussing Rotoclone No. 3's historic permitted emissions. Based on my review of the original Campbell Soup permit application and the SMAQMD's engineering evaluation, I noticed that, while Campbell Soup proposed a 0.000374 lb/cf PM10 emission factor and 99.5% control and 4 hours/week and 208 hours/year of operation, we had used Rotoclone No. 1 & 2's 0.2 gr/dscf PM10 emission factor and 99% control while operating continuously. Please see the comparison table below, with the last column representing your proposal to use the originally-applied for PM10 emission factor while operating continuously:

Parameter	Campbell Soup Application	SMAQMD Evaluation	Campbell Soup Emission Factor and 24/7/365 Operation
Uncontrolled PM10 Emission Factor	0.000374 lb/cf x 7000 gr/lb = 2.618 gr/cf	0.2 gr/dscf	0.000374 lb/cf = 2.618 gr/cf
Rotoclone Control Efficiency	99.5%	99%	99.5%
Controlled PM10 Emission Factor	0.01309 gr/cf	0.002 gr/dscf	0.01309 gr/cf

Maximum Flow Rate	3,000 CFM	3,000 CFM	3,000 CFM
Daily Hours of Operation	4 hours/week x week/7 days = 0.57 hours/day	24 hours/day	24 hours/day
Quarterly Hours of Operation	4 hours/week x 13 weeks/quarter = 52 hours/quarter	24 hours/day x 92 days/qtr = 2,208 hours/qtr	24 hours/day x 92 days/qtr = 2,208 hours/qtr
Annual Hours of Operation	4 hours/week x 52 weeks/year = 208 hours/year	24 hours/day x 365 days/year = 8,760 hours/year	24 hours/day x 365 days/year = 8,760 hours/year
Daily PM10 Emissions	0.01309 gr/cf x 3000 cf/min x lb/7000 gr x 60 min/hr x 0.57 hours/day = 1.9 lb/day	1.2 lb/day	8.1 lb/day
Quarterly PM10 Emissions	0.01309 gr/cf x 3000 cf/min x lb/7000 gr x 60 min/hr x 52 hours/quarter = 17.5 lb/quarter	114 lb/quarter	743 lb/quarter
Annual PM10 Emissions	0.01309 gr/cf x 3000 cf/min x lb/7000 gr x 60 min/hr x 208 hours/year = 70 lb/year	451 lb/year	2,949 lb/year

In order to determine which emission factor should be applicable to your modification, could you please provide supporting documentation for either your newly proposed PM10 emission factor or for the originally proposed 0.000374 lb/cf PM10 emission factor? In the absence of any explanations in the original evaluation of Rotoclone No. 3, I'm assuming that the 0.2 gr/dscf (0.002 gr/dscf controlled) PM10 emission factor was used because it was used to permit Rotoclone Nos. 1 & 2 (even though No. 3 was used to control rock salt dust and Nos. 1 & 2 were used to control flour dust).

Also, I just submitted my evaluation for your recent Rotoclone No. 1 replacement application for my supervisor's review, and will let you know once the Authority to Construct is ready for issuance (at which time I will also submit the Authority to Construct approved for the Rotoclone No. 2 replacement).

Please let me know if you should have any questions in the meantime, and I appreciate your assistance.

Thank you,

Michelle Joe
Associate Air Quality Engineer
Sacramento Metropolitan AQMD
777 12th Street, 3rd Floor
Sacramento, CA 95814
mjoe@airquality.org

(916) 874-4853 Office
(916) 874-4899 Fax

ATTACHMENT C

SMAQMD Rule 201 Authority to Construct

PROPOSED

AIR QUALITY

MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT

A/C NO.: 23336

DATE ISSUED: MARCH 6, 2012

DATE EXPIRES: MARCH 6, 2014

ISSUED TO: CAMPBELL SOUP SUPPLY COMPANY, LLC

LOCATION: 6200 FRANKLIN BLVD., SACRAMENTO, CA 95824

DESCRIPTION: APC ROTOCLONE NO. 1 (REPLACEMENT OF P/O 16888), MAKE: AMERICAN AIR FILTER (AAF), TYPE: W, SIZE NO.: 27, SERIAL NO.: TBD, MAXIMUM CAPACITY: 16,000 ACFM, RATED: 40 HP, VENTING: 6 FLOUR MIXERS AND 1 ALLERGEN SCALE TABLE.

ISSUED BY:


MICHELLE JOE**AUTHORITY TO CONSTRUCT CONDITIONS****START-UP REQUIREMENTS**

S1. Upon installation of the equipment authorized in this Authority to Construct, the owner/operator shall contact the Sacramento Metropolitan Air Quality Management District (SMAQMD) at (916) 874-4800 to arrange for a start-up inspection.

[Basis: SMAQMD Rule 201, Section 405]

S2. This Authority to Construct shall serve as a temporary Permit to Operate provided that:

A. The SMAQMD has been notified to conduct a start-up inspection.

B. The equipment installed matches the equipment authorized in this Authority to Construct.

C. The equipment is operated in compliance with all conditions listed within this Authority to Construct.

[Basis: SMAQMD Rule 201, Section 405]

S3. The owner or operator of a stationary source shall submit to the Air Pollution Control Officer a complete Title V Permit Application for Minor Title V Permit Modification prior to commencing operation associated with the Minor Title V Permit Modification.

[Basis: SMAQMD Rule 207, Section 301.5]

AIR QUALITY
MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT

GENERAL

1. The equipment shall be properly maintained and operated in accordance with the manufacturer's recommendations at all times.
[Basis: SMAQMD Rule 201, Section 405]
2. The 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 Authority to Construct, and
 - B. At reasonable times to have access to and copy any records required to be kept under terms and conditions of this Authority to Construct, and
 - C. To inspect any equipment, operation, or method required in this Authority to Construct, and
 - D. To sample emissions from the source or require samples to be taken.**[Basis: SMAQMD Rule 201, Section 405]**
3. This Authority to Construct does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the California Health and Safety Code or the Rules and Regulations of the SMAQMD.
[Basis: SMAQMD Rule 201, Section 405]
4. The equipment shall not discharge such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
[Basis: SMAQMD Rule 402, Section 301]
5. A legible copy of this Authority to Construct shall be maintained on the premises with the equipment.
[Basis: SMAQMD Rule 201, Section 401]

EMISSION LIMITATIONS

6. The APC rotoclone shall not discharge into the atmosphere any visible air contaminant other than uncombined water vapor for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Ringelmann No. 1 or equivalent to or greater than 20% opacity.
[Basis: SMAQMD Rule 401, Section 301]

AIR QUALITY

MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT

7. Emissions from the APC rotoclone shall not exceed the following:
[Basis: SMAQMD Rule 202, Section 301]

Pollutant	Emission Factors (A) (grains/dscf)	Maximum Allowable Emissions (B)		
		(lb/day)	(lb/quarter)	(lb/year)
PM10	0.002	6.6	606	2,409
PM2.5	0.002	6.6	606	2,409
GHG	0	0 tons/day	0 tons/quarter	0 tons/year

- (A) Emission factor for PM10 and PM2.5 (assuming that all PM is PM10 and PM2.5) assumes 0.2 grains/dscf inlet concentration and 99% control. GHG emission factor is the CO₂e emission factor as per Tables C1 and C2 of Subpart C of EPA's *Mandatory Reporting for Greenhouse Gases* rule (40 CFR, Part 98).
 (B) Emissions based on maximum capacity of 16,000 CFM and 24 hours/day, 92 days/quarter and 365 days/year of operation.

EQUIPMENT OPERATION

8. The flour mixers and allergen scale table shall not operate unless vented to the APC rotoclone.
[Basis: SMAQMD Rule 201, Section 405]
9. The APC rotoclone shall not operate unless the water supply is on.
[Basis: SMAQMD Rule 201, Section 405]

RECORD KEEPING

10. None required, since the APC rotoclone is permitted to operate at maximum capacity, 24 hours/day, 92 days/quarter and 365 days/year.
[Basis: SMAQMD Rule 201, Section 405]

AIR QUALITY

MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT

Your application for this air quality Authority to Construct was evaluated for compliance with Sacramento Metropolitan Air Quality Management District (SMAQMD), state and federal air quality rules. The following listed rules are those that are most applicable to the operation of your equipment. Other rules may also be applicable.

<u>SMAQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
301	STATIONARY SOURCE PERMIT FEES
401	RINGELMANN CHART
404	PARTICULATE MATTER

In addition, the conditions on this Authority to Construct may reflect some, but not all, requirements of these rules. There may be other conditions that are applicable to the operation of your equipment. Future changes in prohibitory rules may establish more stringent requirements which may supersede the conditions listed here.

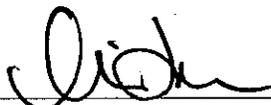
For further information please consult your SMAQMD rulebook or contact the SMAQMD for assistance.

AIR QUALITY

MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT

A/C NO.: 23325

ISSUED BY: 
MICHELLE JOE

DATE ISSUED: MARCH 6, 2012

DATE EXPIRES: MARCH 6, 2014

ISSUED TO: CAMPBELL SOUP SUPPLY COMPANY, LLC

LOCATION: 6200 FRANKLIN BLVD., SACRAMENTO, CA 95824

DESCRIPTION: APC ROTOCLONE NO. 2 (REPLACEMENT OF P/O 17180), MAKE: AMERICAN AIR FILTER (AAF), TYPE: W, SIZE NO.: 27, SERIAL NO.: TBD, MAXIMUM CAPACITY: 16,000 ACFM, RATED: 40 HP, VENTING: 1 BAGGED-FLOUR DUMPING STATION, 5 BULK BAG UNLOADING STATIONS, 2 MSG AND SUGAR BATCHING STATIONS, AND 1 FLOUR SIFTER HOOD.

AUTHORITY TO CONSTRUCT CONDITIONS

START-UP REQUIREMENTS

S1. Upon installation of the equipment authorized in this Authority to Construct, the owner/operator shall contact the Sacramento Metropolitan Air Quality Management District (SMAQMD) at (916) 874-4800 to arrange for a start-up inspection.

[Basis: SMAQMD Rule 201, Section 405]

S2. This Authority to Construct shall serve as a temporary Permit to Operate provided that:

- A. The SMAQMD has been notified to conduct a start-up inspection.
- B. The equipment installed matches the equipment authorized in this Authority to Construct.
- C. The equipment is operated in compliance with all conditions listed within this Authority to Construct.

[Basis: SMAQMD Rule 201, Section 405]

S3. The owner or operator of a stationary source shall submit to the Air Pollution Control Officer a complete Title V Permit Application for Minor Title V Permit Modification prior to commencing operation associated with the Minor Title V Permit Modification.

[Basis: SMAQMD Rule 207, Section 301.5]

AIR QUALITY

MANAGEMENT DISTRICT

AUTHORITY TO CONSTRUCT

GENERAL

1. The equipment shall be properly maintained and operated in accordance with the manufacturer's recommendations at all times.
[Basis: SMAQMD Rule 201, Section 405]
2. The 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 Authority to Construct, and
 - B. At reasonable times to have access to and copy any records required to be kept under terms and conditions of this Authority to Construct, and
 - C. To inspect any equipment, operation, or method required in this Authority to Construct, and
 - D. To sample emissions from the source or require samples to be taken.**[Basis: SMAQMD Rule 201, Section 405]**
3. This Authority to Construct does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the California Health and Safety Code or the Rules and Regulations of the SMAQMD.
[Basis: SMAQMD Rule 201, Section 405]
4. The equipment shall not discharge such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
[Basis: SMAQMD Rule 402, Section 301]
5. A legible copy of this Authority to Construct shall be maintained on the premises with the equipment.
[Basis: SMAQMD Rule 201, Section 401]

EMISSION LIMITATIONS

6. The APC rotoclone shall not discharge into the atmosphere any visible air contaminant other than uncombined water vapor for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Ringelmann No. 1 or equivalent to or greater than 20% opacity.
[Basis: SMAQMD Rule 401, Section 301]