

AIR QUALITY

MANAGEMENT DISTRICT

**STATEMENT OF BASIS
FOR
2nd RENEWAL OF TITLE V FEDERAL OPERATING PERMIT**

APPLICATION NO.:	<u>TV2010-03-01</u>
DATE:	<u>January 26, 2011</u>
REVIEWING ENGINEER:	<u>Michelle Joe</u>

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 Cornes, Environmental Project Engineer
Sacramento Operations
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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 makes 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 HISTORY

This Statement of Basis is for the second renewal of the Title V Federal Operating Permit No. 2005-03-01 issued to Campbell Soup Supply Company, LLC on April 19, 2006. The Title V Federal Operating Permit No. 2005-03-01 has an April 19, 2011 expiration date. 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

This 2nd permit renewal will be assigned the following permit number: TV2010-03-01.

Campbell Soup Supply Company is requesting to renew the Title V federal operating permit for its facility which was issued on 04-19-2006 and last modified on 07-31-2008. This permit renewal will also include an Administrative Amendment to change the company's responsible official.

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 Siemens-Westinghouse. 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 (NOx) and carbon monoxide (CO).

D. FACILITY DESCRIPTION (continued)
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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.

E. SIGNIFICANT EMISSIONS UNIT INFORMATION

This section describes the emission units that have a current and valid Permit to Operate from the SMAQMD and are part of the Title V Federal Operating Permit.

BOILER NO. 1

SMAQMD Permit No. 20160

Cleaver Brooks, Model LD-94-R,H, 100 MMBTU/hour (main burner), 4.9 MMBTU/hour (standing pilot flame burner), natural gas primary fuel, no standby fuel.

BOILER NO. 2

SMAQMD Permit No. 20161

Cleaver Brooks, Model LD-94-R,H, 100 MMBTU/hour (main burner), 4.9 MMBTU/hour (standing pilot flame burner), natural gas primary fuel, no standby fuel.

BOILER NO. 3

SMAQMD Permit No. 20936

Cleaver Brooks, Model DLDH-94, 100 MMBTU/hour (main burner), 4.9 MMBTU/hour (standing pilot flame burner), natural gas primary fuel, no standby fuel.

BOILER NO. 4

SMAQMD Permit No. 20937

Cleaver Brooks, Model CA-28, 139 MMBTU/hour (main burner), 4.9 MMBTU/hour (standing pilot flame burner), natural gas primary fuel, no standby fuel.

DRY INGREDIENT HANDLING AIR POLLUTION CONTROL SYSTEM NO. 1

SMAQMD Permit No. 16888

The Dry Ingredient Air Pollution Control Rotoclone venting six mixers. The APC Rotoclone is an American Air Filter, Type W, Size No. 27 handling 16,000 CFM and rated at 40 hp.

DRY INGREDIENT HANDLING AIR POLLUTION CONTROL SYSTEM NO. 2

SMAQMD Permit No. 17180

The Dry Ingredient Air Pollution Control Rotoclone venting two bagged flour dumping stations, one flour sifter hood, one MSG batching station and one sugar batching station. The APC Rotoclone is an American Air Filter, Type W, Size No. 27 handling 16,000 CFM and rated at 40 hp.

DRY INGREDIENT HANDLING AIR POLLUTION CONTROL SYSTEM NO. 3

SMAQMD Permit No. 18710

The Dry Ingredient Air Pollution Control Rotoclone venting two rock salt storage silos. The APC Rotoclone is an American Air Filter, Type W, Size No. 12 handling 3,000 CFM and rated at 10 hp.

INTERNAL COMBUSTION ENGINE - EMERGENCY USE

SMAQMD Permit No. 14634

An emergency use Internal Combustion Engine that drives a water pump for fighting fires at the site. The Internal Combustion Engine is a Cummins, Model No. V-378-F2, 136 HP, diesel no. 2 fueled.

E. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)
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INTERNAL COMBUSTION ENGINE - EMERGENCY USE

SMAQMD Permit No. 21074

An emergency use Internal Combustion Engine that drives a water pump for fighting fires at the site. The Internal Combustion Engine is a Cummins, Model No. CFP83-F40, 288 HP, diesel no. 2 fueled.

INKJET PRINTING OPERATIONS

SMAQMD Permit No. 22542

The existing inkjet printing operations were previously considered insignificant emissions units when they were each determined to emit less than 2 lb/day of ROC emissions. However, the SMAQMD policy recently changed to consider all inkjet printers as one permit unit, thereby exceeding the 2 lb/day significance limit. The inkjet printing operations consist of various inkjet printers installed on the container and case lines and are used to print codes on packages.

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION

Process Description	Basis for Exemption
Ingredient preparation (transfer, washing, sorting/grading, cutting, dicing, peeling, grinding, dumping, waste stream, conveyors, thaw cabinet, barrel washer, spice batching, pepper slicing, onion slicing)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Blending (blenders, mixers, kettles, blanching/cooking)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Filling (can filler, can sealer)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Sterilizing (retorts, heat sterilization/cookers, hydrostatic cookers, can cooling section)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Packaging (casing, shrinkwrapping, palletizing)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Hot melt glue application on Lines 4, Z, LL01, LL02, LL03, LL04, LL05, LL07, LL08	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Cold glue on Line 4	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Fork lifts and on-site diesel trucks	SMAQMD Rule 201 Section 111.1, vehicles used to transport passengers and freight
Vacuum pumps	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Air conditioning equipment	SMAQMD Rule 201 Section 115, cooling systems
Building ventilation	SMAQMD Rule 201 Section 115, cooling systems
Ventilation heat tunnels	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Laboratory equipment	SMAQMD Rule 201 Section 120, laboratory equipment
Air flow cleaners	SMAQMD Rule 201 Section 115, cooling systems
Maintenance welding hoods	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Lubrication stations	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Paint booth	SMAQMD Rule 201 Section 118.2, < 1 gallon/day
Battery usage and charging station	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Insect and rodent fumigation service performed by contractor	SMAQMD Rule 201 Section 121 Maintenance
Ammonia refrigeration	SMAQMD Rule 201 Section 122, < 2 lb/24 hours

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Process Description	Basis for Exemption
Fructose Tank	SMAQMD Rule 201 Section 117.2 Vapor pressure < 0.1 psi at 20°C
Vegetable oil tanks (20,000 gallon outside silo)	SMAQMD Rule 201 Section 117.2 Vapor pressure < 0.1 psi at 20°C
Fructose tank	SMAQMD Rule 201 Section 117.2 Vapor pressure < 0.1 psi at 20°C
Vegetable oil tank (20,000 gallon outside silo)	SMAQMD Rule 201 Section 117.2 Vapor pressure < 0.1 psi at 20°C
Vegetable oil tank (3,000 gallons on 3rd floor)	SMAQMD Rule 201 Section 117.3 Vapor pressure < 1.5 psi at 20°C and capacity < 6076 gallons
Diesel tanks	SMAQMD Rule 201 Section 117.3 Vapor pressure < 1.5 psi at 20°C and capacity < 6076 gallons
Gasoline tank	SMAQMD Rule 201 Section 117.3 Vapor pressure < 1.5 psi at 20°C and capacity < 6076 gallons
Propane tanks	SMAQMD Rule 201 Section 117.1 Compressed gas
Liquid nitrogen tank	SMAQMD Rule 201 Section 117.1 Liquefied gas
Phosphate tank (liquid)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Corrosion inhibitor tanks	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Sodium hypochlorite tanks	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Belt lubricant tank (850 gallons)	SMAQMD Rule 201 Section 117.3 Vapor pressure < 1.5 psi at 20°C and capacity < 6076 gallons
Detergent tank (3,050 gallons in Soap Room)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Detergent tank (3,800 gallons in Soap Room)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Detergent tank (3,800 gallons in Soap Room)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Detergent tank (1,500 gallons in Soap Room)	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Caustic tanks	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Ammonia tank	SMAQMD Rule 201 Section 122, < 2 lb/24 hours

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Process Description	Basis for Exemption
Biocide tanks	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Chlorine/bleach tanks	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Distilled vinegar tank	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Hydrochloric acid tank	SMAQMD Rule 201 Section 122, < 2 lb/24 hours
Cooling towers, HVACs	SMAQMD Rule 201 Section 115, Cooling system
Cooling towers, air compressors	SMAQMD Rule 201 Section 115, Cooling system
Cooling towers, hydrostatic cookers	SMAQMD Rule 201 Section 115, Cooling system
Evaporative condensers, refrigeration	SMAQMD Rule 201 Section 115, Cooling system

G. ALTERNATE OPERATING SCENARIOS

None requested by the permittee.

H. RECENT PERMIT ACTIONS

Below is a description of local permit actions that have taken place since the last update to the Title V permit.

Permit Cancellations:

The following Permits to Operate have been cancelled and their reference will be removed from the Title V permit:

Cancelled Permits to Operate			
PO No.	Date Cancelled	Equipment Description	Reason for Cancellation
14638	1/16/2008	100 MMBTU/hr Boiler #1	Permit modified by SMAQMD Permit No. 20160 to comply with Rule 411 by replacing the burner and to remove diesel as a standby fuel.
14639	1/16/2008	100 MMBTU/hr Boiler #2	Permit modified by SMAQMD Permit No. 20161 to comply with Rule 411 by replacing the burner and to remove diesel as a standby fuel.
14640	1/16/2008	100 MMBTU/hr Boiler #3	Permit modified by SMAQMD Permit No. 20317 to allow for temporary operation without CEMS monitoring during CEMS upgrade and to remove diesel as a standby fuel.
14641	1/16/2008	139 MMBTU/hr Boiler #4	Permit modified by SMAQMD Permit No. 20318 to allow for temporary operation without CEMS monitoring during CEMS upgrade and to remove diesel as a standby fuel.
20317	11/21/2008	100 MMBTU/hr Boiler #3	Permit modified by SMAQMD Permit No. 20936 to comply with Rule 411 by replacing the burner.
20318	11/21/2008	139 MMBTU/hr Boiler #4	Permit modified by SMAQMD Permit No. 20937 to comply with Rule 411 by replacing the burner.

H. RECENT PERMIT ACTIONS (continued)

New Permits to Operate:

The following Permits to Operate have been issued since the last Title V update and will be incorporated into the Title V permit:

New Permits to Operate			
PO No.	Date Issued	Equipment Description	Reason for Permit
20160	1/16/2008	100 MMBTU/hr Boiler #1	Modification of existing boiler previously permitted under SMAQMD Permit No. 14638.
20161	1/16/2008	100 MMBTU/hr Boiler #2	Modification of existing boiler previously permitted under SMAQMD Permit No. 14639.
20936	11/21/2008	100 MMBTU/hr Boiler #3	Modification of existing boiler previously permitted under SMAQMD Permit No. 14640.
20937	11/21/2008	139 MMBTU/hr Boiler #4	Modification of existing boiler previously permitted under SMAQMD Permit No. 14641.
21074	8/12/2008	288 BHP IC Engine Standby	Newly installed engine.
22542	1/18/2011	Inkjet Printing Operations	SMAQMD permit policy recently changed which required this previously insignificant emissions equipment to obtain an SMAQMD Rule 201 Permit to Operate.

I. FACILITY EMISSIONS

Maximum Allowable 2010 Emissions (tons per year)								
SMAQMD Permit No.	Process or Equipment	ROC	NOx	PM10	SOx	CO	Single HAP (D)	Total HAPs (D)
20160, 20161, 20936, & 20937	Boiler Nos. 1, 2, 3, and 4 (A)	3	60.3	5	0.6	54	<3	<3
16888	Dry Ingredient Handling No. 1	0	0	1.2	0	0	0	0
17180	Dry Ingredient Handling No. 2	0	0	1.2	0	0	0	0
18710	Dry Ingredient Handling No. 3	0	0	1.2	0	0	0	0
14634	IC Engine Emergency Use (B)	0.034	0.42	0.03	0.005	0.091	<0.13	<0.13
21074	IC Engine Emergency Use (B)	0.0635	0.311	0.0095	0.0105	0.165	<0.13	<0.13
22542	Can and Case Printing (C)	1.31	0	0	0	0	<1.3	<1.3
N/A	Labeling Adhesive (C)	0.08	0	0	0	0	<0.09	<0.09
N/A	Misc. ROC Usage (C)	1.99	0	0	0	0	<0.7	<0.7
Total		6.5	61.0	8.6	0.6	54.3	<5.2	<5.2

- (A) Emissions based on combusting natural gas only.
- (B) Emissions based on permitted annual limits.
- (C) Emissions based on actual material usage in 2009.
- (D) Based on the maximum allowable 2004 emissions in the 1st Title V Permit Renewal.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Facility-wide Requirements
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SMAQMD Rule 201 - General Permit Requirements

SIP approved: 07-13-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved
08-24-2006 rule version is the current version and is not SIP approved

Rule Description: This rule provides an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

Compliance Status: Campbell Soup Supply Company has active permits for all sources that require permits.

SMAQMD Rule 202 - New Source Review

SIP approved: 06-19-1985 (50 FR 25417)
11-20-1984 rule version is SIP approved
02-24-2005 rule version is the current version and is not SIP approved

Rule Description: This rule sets the procedures for review of new and modified stationary sources and provides the mechanisms for evaluating the applicability of BACT and offset requirements.

Compliance Status: Processes at Campbell Soup Supply Company that require SMAQMD permits have been reviewed pursuant to this rule. BACT and emission offsets have been provided as required by the rule.

SMAQMD Rule 207 - Title V Federal Operating Permits

SIP approved: 11-21-2003 (68 FR 65637) (part of Title V program approval)
04-26-2001 rule version is SIP approved

Rule Description: This rule sets forth the procedures for review, issuance and renewal of Title V operating permits.

Compliance Status: Campbell Soup Supply Company has submitted a timely and complete Title V application for Title V permit renewal and is currently operating under an active Title V permit.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Facility-wide Requirements (continued)
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SMAQMD Rule 401 - Ringelmann Chart

SIP approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule regulates the discharge of air contaminants into the atmosphere by limiting visible emissions.

Compliance Status: All equipment is expected to comply with the visible emissions requirement.

SMAQMD Rule 403 - Fugitive Dust

SIP approved: 12-05-1984 (49 FR 47490)
08-03-1977 rule version is SIP approved

Rule Description: This rule regulates processes which may periodically cause fugitive dust emissions into the atmosphere.

Compliance Status: The facility complies with this rule by taking the necessary precautions to ensure that fugitive dust is not airborne beyond the property line.

SMAQMD Rule 404 - Particulate Matter

SIP approved: 07-13-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates processes which emit particulate matter into the atmosphere, other than combustion contaminants.

Compliance Status: The facility complies with this rule by capturing particulate matter with air pollution control equipment.

SMAQMD Rule 405 - Dust and Condensed Fumes

SIP approved: 12-05-1984 (49 FR 47490)
08-03-1977 rule version is SIP approved

Rule Description: This rule regulates processes which emit dust and condensed fumes into the atmosphere.

Compliance Status: The facility complies with this rule by capturing particulate matter with air pollution control equipment. See Attachment A for calculations showing compliance.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Facility-wide Requirements (continued)
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SMAQMD Rule 442 - Architectural Coatings

SIP approved: 11-09-1998 (63 FR 60214)
09-05-1996 rule version is SIP approved
05-24-2001 rule version is the current version and is not SIP approved

Rule Description: This rule limits the quantity of volatile organic compounds in architectural coatings supplied, sold, offered for sale, applied, solicited for application or manufactured for use within the SMAQMD.

Compliance Status: The affected coatings used by the facility are received and stored in containers that display the required manufacturer's labels and demonstrate compliance with the rule's requirements.

SMAQMD Rule 466 - Solvent Cleaning

SIP approved: 05-05-2010 (75 FR 24406)
05-23-2002 rule version is SIP approved
10-28-2010 rule version is the current version and is not SIP approved

Rule Description: This rule reduces the emissions of volatile organic compounds from solvent cleaning operations and activities, and from the storage and disposal of new and spent cleaning solvents.

Compliance Status: The affected architectural coating application equipment solvent cleaning materials used by the facility are received and stored in containers that display the required manufacturer's labels and demonstrate compliance with the rule's requirements.

Although the 10-28-2010 rule version has not been SIP approved, this rule requires more stringent VOC content limits on solvent cleaning materials than the previous rule version and has already been submitted for, and is expected to receive, SIP approval. Therefore, pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the most stringent requirements are the permit conditions based on SMAQMD Rule No. 466 rule version 10-28-201, which will be included in the Title V permit.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Facility-wide Requirements (continued)
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40 CFR 68 (begin at 68.1) - Chemical Accident Prevention Provisions

Promulgated: 01-31-1994 (59 FR 4493)
[04-09-2004 (69 FR 18831) most recent amendment]

Rule Description: This regulation specifies requirements for owners or operators of stationary sources concerning the prevention of accidental chemical releases.

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of 40 CFR Part 68.

40 CFR 68.215 requires that the air permitting authority include in the Title V permit for a facility specified statements regarding the regulation. Those statements are included in the Federally Enforceable Requirements - General section of the permit.

Compliance Status: The permittee stores more than the designated amounts of the specified chemical substances in 40 CFR 68 and is in compliance with the requirements of the regulation.

40 CFR 82 Subpart F (begin at 82.150) - Protection of Stratospheric Ozone - Recycling and Emissions Reduction

Promulgated: 05-14-1993 (58 FR 28712)
[04-13-2005 (70 FR 19278) most recent amendment]

Rule Description: The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

This subpart applies to any person servicing, maintaining or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale and persons purchasing class I or class II refrigerants.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements (continued)

As indicated in 40 CFR 70.6, Title V permits need to assure compliance with all applicable requirements at the time of permit issuance. Part 70 defines as an applicable requirement, "Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Act, unless the Administrator has determined that such requirements need not be contained in a Title V permit." [40 CFR 70.2(12)]. The applicable requirements of Title VI are included in the Federally Enforceable Requirements - General section of the permit.

Compliance Status: The permittee employs qualified contractors to maintain equipment that contains class I or class II refrigerants.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Boiler Nos. 1, 2, 3, and 4

Boiler Nos. 1, 2, 3, and 4

SMAQMD Rule 406 - Specific Contaminants

SIP approved: 12-05-1984 (49 FR 47490)
 12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations.

Compliance Status: The boilers are expected to emit SO₂ at less than 0.000019% SO₂ by volume, and PM₁₀ at less than 0.0028 grains/dscf at 12% CO₂.

See Attachment B for calculation of SO₂ and PM emission concentrations from the boilers.

The rule emission limits for SO₂ are 0.2% SO₂ by volume and for PM are 0.1 grains/dscf at 12% CO₂, respectively. The emissions from the boilers at the Campbell Soup Supply Company facility comply with this rule.

SMAQMD Rule 411 - Boiler NOx

SIP approved: 05-06-2009 (74 FR 20880)
 08-23-2007 rule version is SIP approved

Rule Description: This rule limits NOx and CO emissions from boilers, steam generators and process heaters with heat input ratings of 1 MMBTU/hour or greater. It limits the NOx and CO emission concentration as described in the table below (in ppm, corrected to 3% O₂):

Boiler Size (MMBtu/hour)	NOx	CO	or limit fuel usage (therms/year)
≥1 and <2.5	30	400	40,000
≥2.5 and <5	30	400	70,000
≥ 5 and < 20	15	400	200,000
≥ 20 and < 100	9	400	200,000
≥ 100	9	400	300,000

Compliance Status: The emissions from the boilers comply with the 9 ppm NOx and 400 ppm CO corrected to 3% O₂ requirements of the rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Boiler Nos. 1, 2, 3, and 4 (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP approved: 12-05-1984 (49 FR 47490)
 08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous fuels and the expected sulfur content of gaseous fuels combusted in equipment at the facility.

The permittee's equipment complies with this rule.

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel (grains S per 100 cubic feet)	Expected Sulfur Content of Fuel Used (grains S per 100 cubic feet)
Boiler Nos. 1, 2, 3, and 4	Natural Gas	50	0.22 (A)

(A) Based on the sulfur content of pipeline-quality natural gas in Sacramento County.

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Condition Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, mass emissions and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

Equipment	SMAQMD Rule 201 Permit No.	Permit conditions that are <u>not</u> federally enforceable
Boiler Nos. 1, 2, 3, and 4	20160, 20161, 20936, and 20937	Condition Nos. 1, 2, 3, and 4 – These are administrative requirements not contained in any SIP-approved rule or other federally enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Boiler Nos. 1, 2, 3, and 4 (continued)

Boiler No. 4 only

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record.

40 CFR 60 Subpart Db (begin at 60.40b) - NSPS for Industrial - Commercial – Institutional Steam Generating Units:

Rule Description: This regulation is only applicable to a steam generating unit that has a heat capacity greater than 100 MMBTU/hour but less than 250 MMBTU/hour and is modified after June 19, 1984. The regulation limits PM, NO_x, SO_x, and opacity emissions. A **modification** only occurs, by NSPS definition, when there is an increase in emissions. When physical changes were made to Boiler No. 4 the emissions decreased and therefore the NSPS is not applicable.

Compliance Status: Not applicable as explained above.

Boiler Nos. 1, 2 and 3 only

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record.

40 CFR 60 Subpart Dc (begin at 60.40c) - NSPS for Small Industrial - Commercial - Institutional Steam Generating Units:

Rule Description: This regulation affects steam generating units with maximum design heat input of 10 - 100 MMBTU/hour and limits PM, NO_x, SO_x, and opacity emissions. The regulation also requires recordkeeping and reporting. However, no standards within the subpart are applicable to units fired by natural gas only and therefore the NSPS is not applicable.

Compliance Status: Not applicable as explained above.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Boiler Nos. 1, 2, 3, and 4 (continued)

Boiler Nos. 1, 2, 3, and 4

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record.

40 CFR 63 Subpart DDDDD - NESHAP for Industrial, Commercial, and Institutional Boilers:

Rule Description: This regulation establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial and institutional boilers and process heaters that are located at, or part of, a major source of HAP.

Rule Status: This subpart was promulgated on September 13, 2004. However, on July 30, 2007, the Court of Appeals for the District of Columbia Circuit issued its mandate in NRDC v. EPA, vacating the boiler NESHAP because of challenges to EPA's use of health-based compliance alternative standards instead of MACT standards.

Compliance Status: The vacating of this regulation by the court is likened to the regulation never being promulgated. When EPA fails to meet the deadline for establishing emission limits for HAPs under Section 112 of the Clean Air Act or when the court vacates a rule, then the "MACT hammer" (Section 112(j)) is triggered.

The "hammer provisions" require a state or local permitting agency to develop MACT standards for the affected facility on a case-by-case basis. These standards may not be less stringent than the MACT floor, which is the average emission limitation achieved by the best performing 12% of existing sources in the industrial category.

As of this writing, the SMAQMD is anticipating EPA's release of the revised MACT standards. In the meantime, an affected source shall be required to comply with a two-part permit process. Part 1 is a notification of applicability by providing the facility's location and other basic information. Part 2 is a more detailed description of emissions and controls, which will enable the agency to establish emission limits on a facility-by-facility basis.

The boilers at Campbell Soup Supply Company are not subject to the federal NESHAP for Boilers because they are not located at a facility that is a major source for HAP.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Boiler Nos. 1, 2, 3, and 4 (continued)

Boiler Nos. 1, 2, 3, and 4

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record.

40 CFR 64 (begin at 64.1) – Compliance Assurance Monitoring:

Rule Description: This regulation affects pollutant-specific emissions units located at major sources that are required to obtain a Part 70 or 71 permit that: (1) are subject to an emission limitation or standard, and (2) use a control device to achieve compliance, and (3) have potential pre-control emissions that exceed or are equivalent to the major source threshold.

Compliance Status: As exempted under 40 CFR 64.2(b)(1)(vi), the requirements of this part do not apply to emissions limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance determination method. Although these boilers are subject to this part because: (1) they are subject to an emission limitation, and (2) they are equipped with flue gas recirculation systems to achieve compliance, and (3) they have potential pre-control emissions that exceed or are equivalent to the major source threshold, the Title V permit specifies the use of a continuous emission monitoring system (CEMS) to ensure compliance with the NOx emissions limit. The CEMS meets the definition of a continuous compliance determination method since it (1) is used to determine compliance with an emission limitation on a continuous basis and (2) provides data in units correlated directly with the compliance limit. Therefore, these boilers are exempt from this part.

<p>K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Emergency Use IC Engines</p>

SMAQMD Rule 406 - Specific Contaminants

SIP approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations.

Compliance Status: The diesel fueled emergency use IC Engines are expected to emit SO₂ at less than 0.001% SO₂ by volume and PM10 at less than 0.1 grains/dscf at 12% CO₂.

See Attachment B for calculation of SO₂ and PM emission concentrations from the emergency use IC engines.

The rule emission limits for SO₂ are 0.2% SO₂ by volume and for PM are 0.1 grains/dscf at 12% CO₂, respectively. The emissions from the emergency use IC Engines at the Campbell Soup Supply Company facility comply with this rule.

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)
06-01-1995 rule version is SIP approved

Rule Description: This rule regulates NOx, CO and ROC emissions from the operation of stationary IC engines located at major stationary sources of NOx. However, emergency use IC engines are only required to install a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Compliance Status: The emergency use IC engines are each equipped with a non-resetting totalizing hour meter and maintain operation records to comply with this rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Emergency Use IC Engines (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP approved: 12-05-1984 (49 FR 47490)
 08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for liquid fuels and the expected sulfur content of liquid fuels combusted in equipment at the facility.

The permittee's equipment complies with this rule.

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel (% S by weight)	Expected Sulfur Content of Fuel Used (% S by weight)
IC engines, emergency use	CARB diesel	0.5	0.0015

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Condition Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, mass emissions and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

Equipment	SMAQMD Rule 201 Permit No.	Permit conditions that are not federally enforceable
IC engine, emergency use	14634	Condition Nos. 1, 2, 3, and 4 – These are administrative requirements not contained in any SIP-approved rule or other federally enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

**Equipment Specific Requirements
 Emergency Use IC Engines (continued)**

Equipment	SMAQMD Rule 201 Permit No.	Permit conditions that are not federally enforceable
IC engine, emergency use	21074	Condition Nos. 1, 2, 3, and 4 – These are administrative requirements not contained in any SIP-approved rule or other federally enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

40 CFR 60 Subpart IIII (begin at 60.4200) - NSPS for Stationary Compression Ignition Internal Combustion Engines:

Rule Description: This regulation affects manufacturers, owners and operators of new stationary compression ignition internal combustion engines and limits NMHC + NOx, HC, NOx, CO, and PM emissions. The regulation also requires the use of compliant fuels, monitoring equipment and maintenance operation limits.

Compliance Status: The fire pump engine permitted under SMAQMD Permit No. 14634 was installed before July 1, 2006 and therefore the NSPS is not applicable.

The fire pump engine permitted under SMAQMD Permit No. 21074 was installed after July 1, 2006 and is subject to this NSPS. The regulation requires the following:

1. The engine must meet the non-road standard that is applicable to the engine size and year of manufacture. The engine meets the standards specified in Table 4 of this subpart for model year 2008 and earlier engines rated between 175-700 hp, as follows: NOx+ROC – 7.8 g/hp/hr, CO – 2.6 g/hp-hr, PM – 0.40 g/hp-hr.
2. The fuel used must meet the requirements specified in 40 CFR 80.510(b). The engine is required to use CARB diesel to comply with the aforementioned fuel specification.
3. The engine must have an hour meter installed. The engine is equipped with an hour meter.
4. Operation for maintenance purposes shall be limited to 100 hours per year. The engine is limited to 50 hours per year for maintenance purposes.

Therefore, the permittee's equipment complies with this NSPS.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Emergency Use IC Engines (continued)

40 CFR 63 Subpart ZZZZ (begin at 63.6580) - NESHAP for Reciprocating Internal Combustion Engines (RICE):

Rule Description: This regulation limits the emissions of HAP from new reciprocating internal combustion engines located at area and major sources of HAPs.

Compliance Status: The fire pump engine permitted under SMAQMD Permit No. 14634 was installed before June 12, 2006 and therefore the NESHAP is not applicable.

The fire pump engine permitted under SMAQMD Permit No. 21074 was installed after June 12, 2006 and is subject to this NESHAP. The regulation requires the engine to comply with the requirements specified in 40 CFR Subpart IIII - NSPS for Stationary Compression Ignition Internal Combustion Engines. The engine complies with this NSPS, and therefore complies with this NESHAP.

Streamlining Multiple Applicable Requirements:

The emergency use engines are subject to the following overlapping Applicable Federally Enforceable Requirements:

Basis of Requirement	Applicable Requirements % S by weight
SMAQMD Rule No. 420 – Sulfur Content of Fuels	≤ 0.5%
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	≤ 0.0015%

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202, which will be included in the Title V permit.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Emergency Use IC Engines (continued)

Basis of Requirement	Applicable Requirements
SMAQMD Rule No. 412 – Stationary IC Engines Located at Major Stationary Sources of NOx	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202, which will be included in the Title V permit.

<p>K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Dry Ingredient Handling Air Pollution Control Systems Nos. 1, 2 and 3</p>
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Dry Ingredient Handling Air Pollution Control Systems Nos. 1, 2 and 3

SMAQMD Permits to Operate Nos. 16888, 17180 and 18710:

Condition Nos. 1, 2, 3, and 4 – These are administrative requirements not contained in any SIP-approved rule or other federally enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status:

Campbell Soup Supply Company is currently in compliance with all the conditions of the Permit to Operate Nos. 16888, 17180 and 18710.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

**Equipment Specific Requirements
Inkjet Printing Operations**

Inkjet Printing Operations

SMAQMD Permit to Operate No. 22542:

Condition Nos. 1, 2, 3, and 4 – These are administrative requirements not contained in any SIP-approved rule or other federally enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status:

Campbell Soup Supply Company is expected to be in compliance with all the conditions of the Permit to Operate.

L. FUTURE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Facility-wide Requirements

SMAQMD Rule 202 - New Source Review

SIP approved: Not SIP approved
SMAQMD adopted the revised Rule 202 on 10-28-2010

Rule Description:

This rule was revised on 10-28-2010 to provide for the issuance of Authorities to Construct and Permits to Operate at new and modified stationary sources without interfering with the attainment or maintenance of ambient air quality standards.

Compliance Status:

This rule is not effective until U.S. EPA approves SMAQMD Rule 214. This amended rule will affect any new emissions unit or modification of an existing emissions unit occurring on or after the rule effective date.

SMAQMD Rule 214- New Source Review

SIP approved: Not SIP approved
SMAQMD adopted the new Rule 214 on 10-28-2010

Rule Description:

This rule was adopted on 10-28-2010 to provide for the issuance of Authorities to Construct and Permits to Operate at new and modified stationary sources without interfering with the attainment or maintenance of ambient air quality standards.

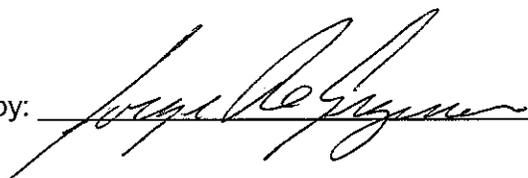
Compliance Status:

This rule will be effective the day of U.S. EPA final action approving this rule. This new rule will affect any new emissions unit or modification of an existing emissions unit occurring on or after the rule effective date.

M. TITLE V PERMIT CONDITIONS

It is recommended that the Campbell Soup Supply Company, LLC Title V Federal Operating Permit be renewed.

See proposed Title V Federal Operating Permit No. TV2010-03-01 for permit conditions.

Approved by:  Date: 4/19/11

ATTACHMENT A

SMAQMD Rule 405
Compliance Calculations
for
Dry Ingredient Air Pollution
Control Systems No. 1, No. 2 and No. 3

Calculation of "Process Weight" for Dry Ingredient Air Pollution Control System No. 1

The total weight of flour introduced to the flour mixers is a maximum of 6,000 lb/hour. Therefore, the total "Process Weight" of all materials used in the process that is exhausted by Dry Ingredient Air Pollution Control System No. 1 is 6,000 lb/hour.

Based on the Table in SMAQMD Rule 405 the maximum allowable "dust and condensed fumes" emission is 7.27 lb/hour for a "Process Weight" of 6,000 lb/hour.

Permit Condition No. 1 in the Dry Ingredient Air Pollution Control System section of the Title V permit limits the PM10 emissions to the following:

$$\text{PM10} = \left(0.002 \frac{\text{grains}}{\text{ft}^3}\right) \times \left(16,000 \frac{\text{ft}^3}{\text{min}}\right) \times \left(\frac{1 \text{ lb}}{7000 \text{ grains}}\right) \times \left(60 \frac{\text{min}}{\text{hour}}\right)$$

$$\text{PM10} = 0.27 \frac{\text{lb}}{\text{hour}} \quad \text{Maximum permitted emission}$$

Since the maximum permitted PM10 emission of 0.27 lb/hour is much less than the SMAQMD Rule 405 maximum allowable emission of 7.27 lb/hour, the process complies with SMAQMD Rule 405.

Calculation of "Process Weight" for Dry Ingredient Air Pollution Control System No. 2

The weight of flour dumped to the flour dumping station is a maximum of 500 lb/hour. The weight of sugar/MSG handled from the sugar/MSG batching station is a maximum of 300 lb/hour. The weight of flour processed in the flour sifter is 5,000 lb/hour. Therefore, the total "Process Weight" of all materials used in the processes that are exhausted by Dry Ingredient Air Pollution Control System No. 2 is 5,800 lb/hour.

Based on the Table in SMAQMD Rule 405 the maximum allowable "dust and condensed fumes" emission is 7.12 lb/hour for a "Process Weight" of 6,000 lb/hour.

Permit Condition No. 2 in the Dry Ingredient Air Pollution Control System of the Title V permit limits the PM10 emissions to the following:

$$\text{PM10} = \left(0.002 \frac{\text{grains}}{\text{ft}^3}\right) \times \left(16,000 \frac{\text{ft}^3}{\text{min}}\right) \times \left(\frac{1 \text{ lb}}{7000 \text{ grains}}\right) \times \left(60 \frac{\text{min}}{\text{hour}}\right)$$

$$\text{PM10} = 0.27 \frac{\text{lb}}{\text{hour}} \quad \text{Maximum permitted emission}$$

Since the maximum permitted PM10 emission of 0.27 lb/hour is much less than the SMAQMD Rule 405 maximum allowable emission of 7.27 lb/hour, the process complies with SMAQMD Rule 405.

Calculation of "Process Weight" for Dry Ingredient Air Pollution Control System No. 3

The weight of rock salt pneumatically conveyed to the storage silo is a maximum of 50,000 lb/hour. The "Process Weight" of all materials used in the processes that are exhausted by Dry Ingredient Air Pollution Control System No. 3 is 50,000 lb/hour.

Based on the Table in SMAQMD Rule 405 the maximum allowable "dust and condensed fumes" emission is 14.7 lb/hour for a "Process Weight" of 50,000 lb/hour.

Permit Condition No. 3 in the Dry Ingredient Air Pollution Control System section of the Title V permit limits the PM10 emissions to the following:

$$\text{PM10} = \left(0.002 \frac{\text{grains}}{\text{ft}^3}\right) \times \left(3,000 \frac{\text{ft}^3}{\text{min}}\right) \times \left(\frac{1 \text{ lb}}{7000 \text{ grains}}\right) \times \left(60 \frac{\text{min}}{\text{hour}}\right)$$

$$\text{PM10} = 0.05 \frac{\text{lb}}{\text{hour}} \quad \text{Maximum permitted emission}$$

Since the maximum permitted PM10 emission of 0.05 lb/hour is much less than the SMAQMD Rule 405 maximum allowable emission of 14.7 lb/hour, the process complies with SMAQMD Rule 405.

ATTACHMENT B

SMAQMD Rule 406
Compliance Calculations
for
Boilers and IC Engines

**Calculation of SO₂ and PM Emission Concentrations
 from Boilers and IC Engines**

Boilers

Assumptions for calculations:

Natural gas F-factor	=	8,710 dscf/MMBTU (at 0% O ₂ , by definition of F factor)
Natural Gas HHV	=	1,000 BTU/cf
Molecular Weight of SO ₂	=	64 grams/mol
Standard Molar Volume	=	0.8493 dscf/gram mole (at 68 degrees F and 1 atm)
Total Maximum Rated Heat Input	=	(100+100+100+139) MMBTU/hour = 439 MMBTU/hour
SO ₂ Emission Factor	=	0.6 lb SO ₂ /mmcf
PM Emission Factor	=	7.6 lb PM/mmcf
Boiler Efficiency	=	85% (assumed for natural gas boiler)
Outlet Oxygen	=	9.5% (assumed for natural gas boiler)
Outlet Carbon Dioxide	=	12% (assumed for natural gas boiler)

SO₂ from Boilers

Based on the SO₂ emission factor for boilers fired on natural gas from U.S. EPA AP42 Table 1.4-2 (7/98), the SO₂ emission concentration from the boilers is estimated to be:

$$\begin{aligned}
 &= \frac{\text{Boiler volumetric SO}_2 \text{ emission rate (ft}^3\text{/hour)}}{\text{Boiler volumetric combustion gas flow rate (ft}^3\text{/hour)}} \\
 &= \frac{(0.6 \text{ lbs SO}_2\text{/mmcf}) (0.439 \text{ mmcf/hour}) (0.8493 \text{ ft}^3\text{/mole}) (1 \text{ mole}/64 \text{ grams}) (453.6 \text{ grams}/\text{lb})}{(439 \text{ MMBTU/hour}) (1 \text{ BTU input}/0.85 \text{ BTU output}) (8,710 \text{ E-6 ft}^3\text{/BTU)}} \\
 &= \frac{1.59 \text{ ft}^3 \text{ SO}_2\text{/hour}}{4,498,458.8 \text{ ft}^3\text{/hour}} \text{ at 0\% O}_2 \text{ by definition of F factor} \\
 &= \frac{1.59 \text{ ft}^3 \text{ SO}_2\text{/hour}}{(4,498,458.8 \text{ ft}^3\text{/hour}) (20.9/(20.9-9.5))} \text{ at 9.5\% O}_2 \text{ actual operating condition, } \frac{20.9}{(20.9-9.5)} \\
 &= (1.93\text{E-7}) * 100 = 0.000019\% \text{ SO}_2 \text{ by volume}
 \end{aligned}$$

**Calculation of SO₂ and PM Emission Concentrations
from Boilers and IC Engines
(continued)**

PM10 from Boilers

Based on the PM emission factor for boilers fired on natural gas from U.S. EPA AP42 Table 1.4-2 (7/98), the PM emission concentration from the boilers is estimated to be:

$$\begin{aligned} &= \frac{\text{Boiler PM mass emission rate (grains/hour)}}{\text{Boiler volumetric combustion gas flow rate (ft}^3\text{/hour)}} \\ &= \frac{(7.6 \text{ lbs PM/mmcf}) (0.439 \text{ mmcf/hour}) (7,000 \text{ grains/lb})}{(439 \text{ MMBTU/hour}) (1 \text{ BTU input}/0.85 \text{ BTU output}) (8,710 \text{ E-6 ft}^3\text{/BTU)}} \\ &= \frac{23,354.8 \text{ grains PM/hour}}{4,498,458.8 \text{ ft}^3\text{/hour}} \text{ at 0\% O}_2 \text{ by definition of F factor} \\ &= \frac{23,354.8 \text{ grains PM/hour}}{(4,498,458.8 \text{ ft}^3\text{/hour}) (20.9/(20.9-9.5))} \text{ at 9.5\% O}_2 \text{ actual operating condition, } \frac{20.9}{(20.9-9.5)} \\ &= 0.0028 \text{ grains/ft}^3 \text{ at 12\% CO}_2 \end{aligned}$$

SMAQMD Rule 406 emission limits for SO₂ and PM are 0.2% SO₂ by volume and 0.1 grains/cf at 12% CO₂, respectively. Therefore, the emissions from the boilers at the Campbell Soup Supply Company facility should comply with this rule.

**Calculation of SO₂ and PM Emission Concentrations
from Boilers and IC Engines
(continued)**

IC Engines:

Assumptions for calculations:

Diesel fuel F-factor	=	9,190 dscf/MMBTU (at 0% O ₂ , by definition of F factor)
Diesel HHV	=	140,000 BTU/gal = 0.14 MMBTU/gal
Molecular weight of SO ₂	=	64 grams/gram mole
Standard molar volume	=	0.8493 dscf/gram mole (at 68 degrees F and 1 atm)
Grains/Pound conversion	=	7000 grains/lb
SO ₂ emission factor	=	0.1645 grams/hp-hr
PM emission factor	=	1.0 grams/hp-hr = 0.29 lb/hr (based on the permitted PM emission factor for P/O 14634 as a worse-case scenario)
IC engine horsepower	=	136 hp (for SMAQMD Permit No. 14634)
IC engine fuel consumption	=	8 gal/hour (for SMAQMD Permit No. 21074)
IC engine heat rate	=	0.0025425 MMBTU/hp-hr at 100% engine efficiency
IC engine efficiency	=	35% (assumed for diesel IC engine)
Outlet oxygen	=	13.5% (typical for diesel IC engine)
Outlet carbon dioxide	=	8% (typical for diesel IC engine)

SO₂ from IC Engines

SO₂ emissions from the IC engines are calculated by dividing the Volumetric SO₂ Emission Rate by the Volumetric Combustion Gas Emission Rate as shown below:

Volumetric SO₂ Emission Rate:

$$\begin{aligned} &= (0.1645 \text{ g/hp-hr}) (0.8493 \text{ dscf/gram mole}) (1 \text{ gram mole}/64 \text{ grams}) \\ &= 0.0022 \text{ dscf SO}_2/\text{hp-hr} \end{aligned}$$

Volumetric Combustion Gas Emission Rate:

$$\begin{aligned} &= (9190 \text{ dscf/MMBTU}) (0.0025425 \text{ MMBTU/hp-hr}) (100\%/35\% \text{ engine efficiency}) \\ &= 67 \text{ dscf of combustion gas/hp-hr at } 0\% \text{ O}_2 \text{ by definition of F factor} \\ &= 189 \text{ dscf of combustion gas/hp-hr at } 13.5\% \text{ O}_2 \text{ at } 13.5\% \text{ O}_2 \text{ actual operating condition, } \frac{(20.9-0)}{(20.9-13.5)} \end{aligned}$$

**Calculation of SO₂ and PM Emission Concentrations
from Boilers and IC Engines
(continued)**

% SO₂ by volume:

$$= \frac{\text{Volumetric SO}_2 \text{ Emission Rate} \times (100\%)}{\text{Volumetric Combustion Gas Emission Rate}}$$

$$= \frac{(0.0022 \text{ dscf SO}_2/\text{hp-hr}) (100\%)}{189 \text{ dscf/hp-hr}}$$

$$= 0.001\% \text{ SO}_2 \text{ by volume}$$

PM10 from IC Engines

$$= \frac{(\text{PM emission rate}) (7000 \text{ grains/lb})}{(\text{heat rate}) (\text{fuel consumption}) (\text{F factor}) (\text{correction to 12\% CO}_2 \text{ from 8\% actual})}$$

$$= \frac{(0.29 \text{ lb PM/hr}) (7000 \text{ grains/lb})}{(0.14 \text{ MMBTU/hr}) (8 \text{ gal/hr}) (9190 \text{ dscf/MMBTU}) (12\%/8\%)}$$

$$= 0.13 \text{ grains/dscf at 12\% CO}_2$$

SMAQMD Rule 406 emission limits for SO₂ and PM are 0.2% SO₂ by volume and 0.1 grains/dscf at 12% CO₂, respectively. The particulate emission concentration limit is regulated by SMAQMD Rule 406 to only one decimal point. Therefore, the calculated emission can be as high as 0.149 grains/dscf and still be in compliance with the rule. Therefore, the emissions from the IC Engines at the Campbell Soup Supply Company facility should comply with this rule.

ATTACHMENT C

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.
●	●	202	New Source Review 11/20/1984 adoption	Yes - 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"?
		203	Prevention of Significant Deterioration	No - it is not a SIP approved rule.
		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.
		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.
●	*	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.)

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	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.
●	●	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.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	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.
●	●	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

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	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.
●	●	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.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	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.
●	●	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.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	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.
●	●	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.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	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.
		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.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
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		1006	Transportation Conformity	No - it is not a SIP approved rule.
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ATTACHMENT D

SMAQMD Rule 201 Permits To Operate

SACRAMENTO METROPOLITAN



PERMIT TO OPERATE

ISSUED TO: CAMPBELL SOUP SUPPLY COMPANY, LLC

EQUIPMENT LOCATION: 6200 FRANKLIN BLVD., SACRAMENTO, CA 95824

PERMIT NO.	EQUIPMENT DESCRIPTION
20160	LOAD-FOLLOWING UNIT: BOILER #1, MAKE: CLEAVER BROOKS, MODEL: LD-94-R,H, SERIAL NO.: W-3548, MAXIMUM RATED HEAT INPUT: 100 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, BACKUP FUEL: NONE, EQUIPPED WITH NATCOM ULTRA LOW-NOx BURNER (MAIN BURNER) AND 4.9 MMBTU/HR STANDING PILOT FLAME BURNER, APPLICATION: INDUSTRIAL PROCESS/SOUP MANUFACTURING.
20161	LOAD-FOLLOWING UNIT: BOILER #2, MAKE: CLEAVER BROOKS, MODEL: LD-94-R,H, SERIAL NO.: W-3549, MAXIMUM RATED HEAT INPUT: 100 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, BACKUP FUEL: NONE, EQUIPPED WITH NATCOM ULTRA LOW-NOx BURNER (MAIN BURNER) AND 4.9 MMBTU/HR STANDING PILOT FLAME BURNER, APPLICATION: INDUSTRIAL PROCESS/SOUP MANUFACTURING.
20936	LOAD-FOLLOWING UNIT: BOILER #3, MAKE: CLEAVER BROOKS, MODEL: DLDH-94, SERIAL NO.: W35530, MAXIMUM RATED HEAT INPUT: 100 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, BACKUP FUEL: NONE, EQUIPPED WITH NATCOM ULTRA LOW-NOx BURNER (MAIN BURNER) AND 4.9 MMBTU/HR STANDING PILOT FLAME BURNER, APPLICATION: INDUSTRIAL PROCESS/SOUP MANUFACTURING.
20937	LOAD-FOLLOWING UNIT: BOILER #4, MAKE: CLEAVER BROOKS, MODEL: CA-28, SERIAL NO.: WL1018, MAXIMUM RATED HEAT INPUT: 139 MMBTU/HR, PRIMARY FUEL: NATURAL GAS, BACKUP FUEL: NONE, EQUIPPED WITH NATCOM ULTRA LOW-NOx BURNER (MAIN BURNER) AND 4.9 MMBTU/HR STANDING PILOT FLAME BURNER, APPLICATION: INDUSTRIAL PROCESS/SOUP MANUFACTURING.
CONTINUOUS EMISSION MONITOR	NOx AND O ₂ CONTINUOUS STACK GAS ANALYZER, MAKE: HORIBA, MODEL: CMA-C622L, SERIAL NO.: 41640100043, EQUIPPED WITH EMC DATA ACQUISITION SYSTEM, MONITORING BOILER #1, #2, #3, AND #4.

DATE REVISED: 04-19-2011
DATE ISSUED: 11-21-2008
DATE EXPIRES: 02-24-2012 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: 

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED AND OPERATED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS AT ALL TIMES.
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.
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 AIR QUALITY MANAGEMENT DISTRICT.
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.
5. A LEGIBLE COPY OF THIS AUTHORITY TO CONSTRUCT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSION LIMITATIONS

6. THE BOILERS 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.
7. THE MAIN BURNER OF BOILERS #1, #2, #3, & #4 (P/O 20160, 20161, 20936, & 20937), WHEN BURNING NATURAL GAS FUEL, SHALL NOT EMIT:
 - A. NITROGEN OXIDES (NO_x) IN EXCESS OF 9 PPMVD, CORRECTED TO 3% O₂ AND AVERAGED OVER A PERIOD AS SPECIFIED IN CONDITION NO. 16 OR:
 - i. AVERAGED HOURLY IN PPMVD CORRECTED TO 3% O₂ FOR EACH BOILER, USING THE AVERAGE OF THE THREE PREVIOUS ONE HOUR AVERAGE CONCENTRATIONS, AND
 - ii. TOTALED FROM ALL FOUR BOILERS (LB/HOUR), USING THE AVERAGE OF THE THREE PREVIOUS ONE HOUR AVERAGE CONCENTRATIONS,
 - B. CARBON MONOXIDE (CO) IN EXCESS OF 400 PPMVD, CORRECTED TO 3% O₂ AND AVERAGED OVER A PERIOD OF 15 CONSECUTIVE MINUTES,AS APPLICABLE, EXCEPT DURING PERIODS OF STARTUP OR SHUTDOWN AS DEFINED IN RULE 411, BOILER NO_x.
8. THE STANDING PILOT FLAME BURNERS OF BOILERS #1, #2, #3, & #4 (P/O 20160, 20161, 20936, & 20937), WHEN BURNING NATURAL GAS FUEL, SHALL NOT EMIT:
 - A. NITROGEN OXIDES (NO_x) IN EXCESS OF 30 PPMVD, CORRECTED TO 3% O₂ AND AVERAGED OVER A PERIOD AS SPECIFIED IN CONDITION NO. 16 OR:
 - i. AVERAGED HOURLY IN PPMVD CORRECTED TO 3% O₂ FOR EACH BOILER, USING THE AVERAGE OF THE THREE PREVIOUS ONE HOUR AVERAGE CONCENTRATIONS, AND
 - ii. TOTALED FROM ALL FOUR BOILERS (LB/HOUR), USING THE AVERAGE OF THE THREE PREVIOUS ONE HOUR AVERAGE CONCENTRATIONS,
 - B. CARBON MONOXIDE (CO) IN EXCESS OF 400 PPMVD, CORRECTED TO 3% O₂ AND AVERAGED OVER A PERIOD OF 15 CONSECUTIVE MINUTES,AS APPLICABLE, EXCEPT DURING PERIODS OF STARTUP OR SHUTDOWN AS DEFINED IN RULE 411, BOILER NO_x.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

9. THE EMISSIONS FROM THE MAIN BURNER OF EACH BOILER #1, #2 & #3 (P/O 20160, 20161 & 20936) WHEN USING NATURAL GAS SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (A) LB/MMCF	MAXIMUM ALLOWABLE EMISSIONS FOR NATURAL GAS FIRING (B)	
		LB/DAY	LB/QUARTER
ROC	4	9.6	883
NOx	10.9	26.2	2,407
SOx	0.6	1.4	132
PM10	7.6	18.2	1,678
CO	(C)	576 (D)	52,992 (E)

- (A) EMISSION FACTOR FOR SOx AND PM10 FROM AP-42, TABLE 1.4-2 (7/98). EMISSION FACTOR FOR NOx AND ROC ARE BASED ON THE MANUFACTURER'S GUARANTEE OF 9 PPMVD NOx AND 10 PPMVD ROC CORRECTED TO 3% O₂.
- (B) EMISSIONS BASED ON MAXIMUM CAPACITY OF 100,000 CF/HOUR, THE EMISSION FACTORS IN THIS TABLE AND OPERATING FOR 24 HOURS/DAY AND 92 DAYS/QUARTER, EXCEPT FOR CO.
- (C) THE CO EMISSION FACTORS ARE BASED ON SOURCE TEST DATA. THE FACTORS USED SHALL BE DETERMINED BASED ON THE METHOD OUTLINED IN ATTACHMENT A.
- (D) DAILY EMISSIONS LIMIT FOR CO IS BASED ON PERMITTED LEVELS FOR ALL FOUR BOILERS COMBINED AND THE EMISSION FACTOR DERIVED FROM THE METHOD OUTLINED IN ATTACHMENT A.
- (E) QUARTERLY EMISSIONS LIMIT FOR CO IS BASED ON PERMITTED DAILY LEVEL OF 576 LBS/DAY AND OPERATING FOR 92 DAYS/QUARTER FOR ALL FOUR BOILERS COMBINED.

10. THE EMISSIONS FROM BOILER #4 (P/O 20937) WHEN BURNING NATURAL GAS SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (A) LB/MMCF	MAXIMUM ALLOWABLE EMISSIONS FOR NATURAL GAS FIRING (B)	
		LB/DAY	LB/QUARTER
ROC	4	13.3	1,228
NOx	36	36.4	3,345
SOx	0.6	2.0	184
PM10	7.6	25.4	2,333
CO	(C)	576 (D)	52,992 (E)

- (A) EMISSION FACTORS FOR ROC, SOx AND PM10 FROM AP-42, TABLE 1.4-1,2,3 (10/96). EMISSION FACTOR FOR NOx IS BASED ON 30 PPMVD CORRECTED TO 3% O₂.
- (B) EMISSIONS BASED ON MAXIMUM CAPACITY OF 139,000 CF/HOUR, THE EMISSION FACTORS IN THIS TABLE AND OPERATING FOR 24 HOURS/DAY AND 92 DAYS/QUARTER, EXCEPT FOR CO.
- (C) THE CO EMISSION FACTOR IS BASED ON SOURCE TEST DATA. THE FACTOR USED SHALL BE DETERMINED BASED ON THE METHOD OUTLINED IN ATTACHMENT A.
- (D) DAILY EMISSIONS FOR CO IS BASED ON PERMITTED LEVELS FOR ALL FOUR BOILERS COMBINED AND THE EMISSION FACTOR DERIVED FROM THE CRITERIA OUTLINED IN ATTACHMENT A.
- (E) QUARTERLY EMISSIONS FOR CO ARE BASED ON PERMITTED DAILY LEVEL OF 576 LBS/DAY AND OPERATING FOR 92 DAYS/QUARTER FOR ALL FOUR BOILERS COMBINED.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

11. THE EMISSIONS FROM THE STANDING PILOT FLAME BURNER OF EACH BOILER #1, #2, #3, & #4 (P/O 20160, 20161, 20936, & 20937) WHEN USING NATURAL GAS SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (A) LB/MMCF	MAXIMUM ALLOWABLE EMISSIONS FOR NATURAL GAS FIRING (B)	
		LB/DAY	LB/QUARTER
ROC	5.5	0.6	60
NOx	36.4	4.3	394
SOx	0.6	0.1	6
PM10	7.6	0.9	82
CO	296	576 (C)	52,992 (D)

- (A) EMISSION FACTORS FOR ROC, SOx AND PM10 FROM AP-42, TABLE 1.4-2 (7/98). EMISSION FACTOR FOR NOx AND CO ARE BASED ON 30 PPMVD NOx AND 400 PPMVD CO CORRECTED TO 3% O₂.
 (B) EMISSIONS BASED ON MAXIMUM CAPACITY OF 4,900 CF/HOUR, THE EMISSION FACTORS IN THIS TABLE AND OPERATING FOR 24 HOURS/DAY AND 92 DAYS/QUARTER, EXCEPT FOR CO.
 (C) DAILY EMISSIONS LIMIT FOR CO IS BASED ON PERMITTED LEVELS FOR ALL FOUR BOILERS COMBINED AND THE EMISSION FACTOR DERIVED FROM THE METHOD OUTLINED IN ATTACHMENT A.
 (D) QUARTERLY EMISSIONS LIMIT FOR CO IS BASED ON PERMITTED DAILY LEVEL OF 576 LBS/DAY AND OPERATING FOR 92 DAYS/QUARTER FOR ALL FOUR BOILERS COMBINED.

12. THE COMBINED NOx EMISSIONS FROM BOILERS #1, #2, #3, AND #4 (P/O 20160, 20161, 20936, & 20937) WHEN BURNING NATURAL GAS SHALL NOT EXCEED THE FOLLOWING LIMITS:

	QUARTER 1 JAN-MAR	QUARTER 2 APR-JUN	QUARTER 3 JUL-SEP	QUARTER 4 OCT-DEC
NOx, LB/DAY	275	250	450	350
NOx, TONS/QUARTER	12.5	11.4	20.5	15.9

13. THE COMBINED EMISSIONS FROM BOILERS #1, #2, #3, AND #4 (P/O 20160, 20161, 20936, & 20937) WHEN BURNING NATURAL GAS SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR LB/MMCF	MAXIMUM ALLOWABLE EMISSIONS (D)	
		LB/DAY	TONS/YEAR
ROC	BOILERS #1, #2, #3, & #4 – MAIN BURNER = 4 (A) BOILERS #1 & 2 – STANDING PILOT FLAME BURNER = 5.5 (B)	27.6	3
NOx	USE CEM DATA	CONDITION NO. 12	60.3
SOx	0.6 (B)	6	0.6
PM10	7.6 (B)	49.4	5
CO	(C)	576	54

- (A) EMISSION FACTOR FOR ROC FROM MANUFACTURER'S GUARANTEE OF 10 PPMVD CORRECTED TO 3% O₂.
 (B) EMISSION FACTOR FOR ROC, SOx AND PM10 FROM AP-42, TABLE 1.4-2 (7/98).
 (C) THE CO FACTORS USED SHALL BE DETERMINED BASED ON THE CRITERIA OUTLINED IN ATTACHMENT A.
 (D) BASED ON DAILY AND ANNUAL NATURAL GAS USAGE AND THE EMISSION FACTOR LISTED IN THIS TABLE.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

EQUIPMENT OPERATION

14. THE RESPECTIVE FLUE GAS RECIRCULATION SYSTEMS SHALL OPERATE WHENEVER THE BOILERS ARE OPERATING.
15. A COMPUTERIZED TRACKING SYSTEM THAT MAINTAINS A CONTINUOUS DAILY RECORD OF FUEL USAGE SHALL BE INSTALLED, MAINTAINED AND OPERATED TO MONITOR PERIODS OF INDIVIDUAL STANDING PILOT FLAME BURNER USAGE TO CALCULATE CO EMISSIONS IN ACCORDANCE WITH ATTACHMENT A.
16. AN IN-STACK CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) AND DATA ACQUISITION SYSTEM (DAS), THAT HAS BEEN APPROVED BY THE SMAQMD AIR POLLUTION CONTROL OFFICER, SHALL BE INSTALLED, OPERATED AND MAINTAINED FOR EACH BOILER EXHAUST STACK. THE CEMS SHALL OPERATE WHENEVER THE MAIN BURNER OR STANDING PILOT FLAME BURNER OF EACH BOILER OPERATES.
 - A. THE CEMS SHALL MONITOR AND RECORD THE CONCENTRATION OF NITROGEN OXIDES AND OXYGEN.
 - B. THE CEMS SHALL BE INSTALLED AND OPERATED IN COMPLIANCE WITH THE U.S. EPA MONITORING REQUIREMENTS SPECIFIED IN 40 CFR 60.13.
 - C. THE CEMS SHALL COMPLY WITH THE U.S. EPA PERFORMANCE SPECIFICATIONS SPECIFIED IN 40 CFR 60 APPENDIX B, PERFORMANCE SPECIFICATIONS 2 AND 3.
 - D. THE CEMS SHALL COMPLY WITH THE U.S. EPA QUALITY ASSURANCE PROCEDURES SPECIFIED IN 40 CFR 60 APPENDIX F.
 - E. THE DAS SHALL HAVE THE CAPABILITY OF EXPRESSING THE MEASURED NO_x EMISSIONS IN TERMS OF PARTS PER MILLION BY VOLUME DRY (PPMVD) CORRECTED TO 3% O₂.
 - F. THE DAS SHALL RECORD NO_x EMISSIONS IN THE ENGINEERING UNITS DEFINED BY THE PERMIT TO OPERATE.
 - G. THE DAS SHALL RECORD ALL DATA IN COMPLIANCE WITH U.S. EPA QUALITY ASSURANCE PROCEDURES SPECIFIED IN 40 CFR 60 APPENDIX F.
 - H. THE CEMS AND DAS SHALL MONITOR AND COLLECT A MINIMUM OF DATA AS FOLLOWS:
 1. OBTAIN AT LEAST TWO DATA POINTS PER HOUR IN ORDER TO CALCULATE A VALID 1-HOUR ARITHMETIC AVERAGE. 40 CFR 60.13(E)(2) REQUIRES CEMS TO COMPLETE AT LEAST ONE CYCLE OF OPERATION (SAMPLING, ANALYZING AND DATA RECORDING) FOR EACH SUCCESSIVE 15-MINUTE PERIOD.
 2. COMPLIANCE WITH THE EMISSION LIMITS OF CONDITION NO. 7 AND 8 SHALL BE DETERMINED ON AN HOURLY BASIS USING THE THREE PREVIOUS ONE HOUR AVERAGE EMISSIONS CONCENTRATIONS.
17. THE FUEL FLOW METERS TO MONITOR THE NATURAL GAS FUEL FLOW RATE TO THE BOILERS SHALL BE PROPERLY MAINTAINED AND CALIBRATED.
18. THE CONTINUOUS EMISSIONS TRACKING SYSTEM TO CALCULATE THE HOURLY, DAILY, QUARTERLY AND ANNUAL NO_x EMISSIONS FROM THE BOILERS SHALL BE PROPERLY MAINTAINED AND OPERATED TO ENSURE THE LIMITS IN CONDITION NO. 7, 8, 9, 10, 11, 12, AND 13 ARE NOT EXCEEDED.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

RECORD KEEPING

19. THE FOLLOWING RECORD SHALL BE CONTINUOUSLY MAINTAINED ON SITE FOR THE MOST RECENT THREE YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE AIR POLLUTION CONTROL OFFICER UPON REQUEST. QUARTERLY AND ANNUAL RECORDS SHALL BE MADE AVAILABLE FOR INSPECTION WITHIN 30 DAYS OF THE END OF THE PREVIOUS QUARTER OR YEAR RESPECTIVELY.

FREQUENCY	INFORMATION TO BE RECORDED
HOURLY	A. AVERAGE HOURLY NO _x CONCENTRATION IN PPMVD CORRECTED TO 3% O ₂ FOR EACH BOILER, USING THE AVERAGE OF THE THREE PREVIOUS ONE HOUR AVERAGE CONCENTRATIONS. CONDITION NO. 7 AND 8 B. TOTAL HOURLY NO _x EMISSIONS FROM ALL FOUR BOILERS (LB/HOUR), USING THE AVERAGE OF THE THREE PREVIOUS ONE HOUR AVERAGE CONCENTRATIONS. CONDITION NO. 12
DAILY	A. TOTAL DAILY NATURAL GAS USAGE FOR EACH BOILER (CF/DAY). B. TOTAL DAILY NO _x , CO, ROC, SO _x AND PM ₁₀ EMISSIONS, WHEN BURNING NATURAL GAS, FROM ALL FOUR BOILERS (LB/DAY). CONDITION NO. 13
QUARTERLY	A. TOTAL QUARTERLY NO _x EMISSIONS, WHEN BURNING NATURAL GAS, FOR ALL FOUR BOILERS (TONS/QUARTER). CONDITION NO. 13
ANNUALLY	A. TOTAL ANNUAL NATURAL GAS USAGE FOR EACH BOILER (CF/YEAR). B. TOTAL ANNUAL NO _x , CO, ROC, SO _x AND PM ₁₀ EMISSIONS FROM ALL FOUR BOILERS (TONS/YEAR). CONDITION NO. 13

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

REPORTING

20. A WRITTEN REPORT SHALL BE SUBMITTED TO THE AIR POLLUTION CONTROL OFFICER INCLUDING THE FOLLOWING INFORMATION:

FREQUENCY	INFORMATION TO BE INCLUDED IN REPORT
QUARTERLY SUBMITTED BY THE FOLLOWING DATES OF EACH YEAR: JANUARY 30 APRIL 30 JULY 30 OCTOBER 30	QUARTERLY OPERATING REPORT TO INCLUDE THE FOLLOWING: A. TOTAL NATURAL GAS FUEL USAGE FOR ALL FOUR BOILERS (CUBIC FEET/QUARTER). B. TOTAL NO _x EMISSIONS FROM NATURAL GAS FUEL USAGE FOR ALL FOUR BOILERS (TONS/QUARTER).
QUARTERLY SUBMITTED BY THE FOLLOWING DATES OF EACH YEAR: JANUARY 30 APRIL 30 JULY 30 OCTOBER 30	QUARTERLY EXCESS EMISSIONS REPORT TO INCLUDE THE FOLLOWING: (EXCESS EMISSIONS ARE DEFINED AS ANY PERIOD DURING WHICH THE EMISSIONS OF NO _x EXCEEDS THE LIMIT OF CONDITION NO. 7, 8, 9, 10, 11, 12, OR 13.) A. THE DATE AND TIME OF COMMENCEMENT AND COMPLETION OF EACH TIME PERIOD OF EXCESS EMISSIONS. B. THE MAGNITUDE OF EXCESS EMISSIONS IN UNITS OF PPMVD, POUNDS PER HOUR, POUNDS PER DAY, POUNDS PER QUARTER OR POUNDS PER YEAR AS APPLICABLE. C. SPECIFIC IDENTIFICATION OF EACH PERIOD OF EXCESS EMISSIONS THAT OCCURS DURING START-UPS, SHUTDOWNS AND MALFUNCTIONS OF THE BOILER 1. THE NATURE AND CAUSE OF ANY MALFUNCTIONS (IF KNOWN). 2. THE CORRECTIVE ACTION TAKEN OR PREVENTATIVE MEASURES ADOPTED. D. THE DATE AND TIME IDENTIFYING EACH PERIOD DURING WHICH THE CONTINUOUS EMISSION MONITOR OR THE CONTINUOUS EMISSIONS TRACKING SYSTEM WAS INOPERATIVE, EXCEPT FOR ZERO AND SPAN CHECKS, AND THE NATURE OF THE SYSTEM REPAIRS OR ADJUSTMENTS. E. WHEN NO EXCESS EMISSIONS HAVE OCCURRED OR THE CONTINUOUS MONITORING SYSTEM HAS NOT BEEN INOPERATIVE, REPAIRED OR ADJUSTED, SUCH INFORMATION SHALL BE STATED IN THE REPORT.

EMISSION TESTING

21. A NO_x AND CO SOURCE TEST OF THE MAIN BURNER OF BOILERS #1, #2, #3, & #4 (P/O 20160, 20161, 20936, & 20937) USING NATURAL GAS AS A FUEL SHALL BE PERFORMED ANNUALLY TO VERIFY COMPLIANCE WITH CONDITION NO. 7. A SEPARATE NO_x AND CO SOURCE TEST OF THE STANDING PILOT FLAME BURNER OF BOILERS #1, #2, #3, & #4 (P/O 20160, 20161, 20936, & 20937) SHALL BE PERFORMED ANNUALLY TO VERIFY COMPLIANCE WITH CONDITION NO. 8. THE TEST SHALL CONFORM TO THE FOLLOWING TEST CONDITION AND TIME SCHEDULE:

- A. SUBMIT A SOURCE TEST PLAN TO THE AIR POLLUTION CONTROL OFFICER FOR APPROVAL AT LEAST 30 DAYS BEFORE THE SOURCE TEST IS TO BE PERFORMED.
- B. NOTIFY THE AIR POLLUTION CONTROL OFFICER AT LEAST 7 DAYS PRIOR TO THE SOURCE TEST DATE.
- C. SUBMIT THE SOURCE TEST REPORT TO THE AIR POLLUTION CONTROL OFFICER WITHIN 60 DAYS FROM THE COMPLETION OF THE SOURCE TEST.

22. TEST METHODS USED AND FIRING RATES FOR THE SOURCE TESTS SHALL BE THOSE SPECIFIED IN SECTION 501.1 OF RULE 411 BOILER NO_x.

23. RELATIVE ACCURACY TEST OF THE CONTINUOUS EMISSIONS MONITORING SYSTEM SHALL BE PERFORMED AT THE TIME OF THE ANNUAL EMISSIONS TEST AS SPECIFIED IN CONDITION NO. 16.D.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

ATTACHMENT A

CO EMISSION CALCULATION METHOD

CAMPBELL SOUP SUPPLY COMPANY, LLC

PERMIT NUMBER	EQUIPMENT	RATING	CO EMISSION FACTOR A	DAILY USAGE B	DAILY USAGE UNITS	CO EMISSION LB/DAY = A x B
20160	BOILER #1 (MAIN BURNER)	100 MMBTU/HR	30 LB/MMCF OR (A)		MMCF/DAY	
20160	BOILER #1 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
20161	BOILER #2 (MAIN BURNER)	100 MMBTU/HR	30 LB/MMCF OR (A)		MMCF/DAY	
20161	BOILER #2 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
20936	BOILER #3 (MAIN BURNER)	100 MMBTU/HR	30 LB/MMCF OR (A)		MMCF/DAY	
20936	BOILER #3 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
20937	BOILER #4 (MAIN BURNER)	139 MMBTU/HR	187 LB/MMCF OR (A)		MMCF/DAY	
20937	BOILER #4 (STANDING PILOT FLAME BURNER)	4.9 MMBTU/HR	296 LB/MMCF		MMCF/DAY	
TOTAL DAILY CO EMISSIONS						
[NOT TO EXCEED 576 LB/DAY]						

(A) DATA FROM THE MOST RECENT SOURCE TEST SHALL BE USED IF THAT DATA PRODUCES AN EMISSION FACTOR GREATER THAN THE VALUE SHOWN IN THIS TABLE.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO AIR QUALITY MANAGEMENT DISTRICT (AQMD), 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.

AQMD RULE NUMBER	RULE
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
207	ENHANCED NEW SOURCE REVIEW
301	STATIONARY SOURCE PERMIT FEES
401	RINGLEMANN CHART
402	NUISANCE
406	SPECIFIC CONTAMINANTS
411	BOILER NOx
420	SULFUR CONTENT OF FUELS

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE 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 AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.



PERMIT TO OPERATE

**CAMPBELL SOUP SUPPLY COMPANY, LLC
6200 FRANKLIN BOULEVARD
SACRAMENTO, CA 95824**

EQUIPMENT LOCATION: 6200 FRANKLIN BOULEVARD, SACRAMENTO CA

PERMIT NO.	EQUIPMENT DESCRIPTION
16888	AIR POLLUTION CONTROL SYSTEM CONSISTING OF THE FOLLOWING: 1. ROTOCLONE, AMERICAN AIR FILTER, TYPE W, SIZE NO. 27, 16,000 CFM, 40 HP. 2. EXHAUST SYSTEM VENTING SIX FLOUR MIXERS.

SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL

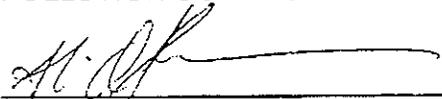
1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED.
2. THE AIR POLLUTION CONTROL OFFICER AND/OR AUTHORIZED REPRESENTATIVES, UPON THE PRESENTATION OF CREDENTIALS, SHALL BE PERMITTED:
 - A. TO ENTER UPON THE PREMISES WHERE THE SOURCE IS LOCATED OR IN WHICH ANY RECORDS ARE REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - B. TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT 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 AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSIONS LIMITATIONS

5. THE EQUIPMENT SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS 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 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

NORM COVELL
AIR POLLUTION CONTROL OFFICER

DATE ISSUED: 08-14-2003
DATE EXPIRES: 02-24-2004 (UNLESS RENEWED)

BY: 

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

6. THE EMISSIONS FROM THE EQUIPMENT SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (A)	MAXIMUM ALLOWABLE EMISSIONS (B)
	GRAINS/DSCF	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 ACFM), 24 HOURS/DAY AND 92 DAYS/QUARTER.

EQUIPMENT OPERATION

7. THE FLOUR MIXERS SHALL NOT OPERATE UNLESS VENTED TO THE APC ROTOCLONE.
8. THE ROTOCLONE SHALL NOT OPERATE UNLESS THE WATER SUPPLY IS ON.

RECORD KEEPING

NONE (BECAUSE MAXIMUM ALLOWABLE EMISSIONS ARE BASED ON MAXIMUM CAPACITY, 24 HOURS/DAY AND 92 DAYS/QUARTER.)

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO AIR QUALITY MANAGEMENT DISTRICT (AQMD), 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>AQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
401	RINGELMANN CHART
404	PARTICULATE MATTER

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE 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 AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.

SACRAMENTO METROPOLITAN



PERMIT TO OPERATE

CAMPBELL SOUP SUPPLY CO., LLC
6200 FRANKLIN BOULEVARD
SACRAMENTO, CA 95824

EQUIPMENT LOCATION: 6200 FRANKLIN BLVD., SACRAMENTO

PERMIT NO.	EQUIPMENT DESCRIPTION
17180	APC ROTOCLONE, AMERICAN AIR FILTER, TYPE W, SIZE NO. 27, S.N: 03-4429, 16,000 ACFM, 40 HP, SERVING 3 BAGGED FLOUR DUMPING STATIONS.

SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL

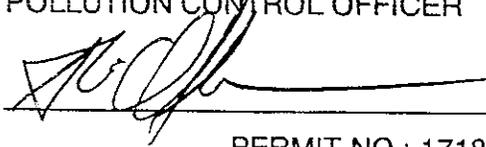
1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED.
2. THE AIR POLLUTION CONTROL OFFICER AND/OR AUTHORIZED REPRESENTATIVES, UPON THE PRESENTATION OF CREDENTIALS SHALL BE PERMITTED:
 - A. TO ENTER UPON THE PREMISES WHERE THE SOURCE IS LOCATED OR IN WHICH ANY RECORDS ARE REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT 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 AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSION LIMITATIONS

5. THE EQUIPMENT SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS 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 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

DATE ISSUED: 07-30-2004
DATE EXPIRES: 02-24-2005 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: 

PAGE 1 OF 2 PAGES

PERMIT NO.: 17180

REVOCABLE AND NON-TRANSFERABLE

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

6. THE EMISSIONS FROM THE EQUIPMENT SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (A)	MAXIMUM ALLOWABLE EMISSIONS (B)
	GRAINS/DSCF	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 ACFM), 24 HOURS/DAY AND 92 DAYS/QUARTER.

EQUIPMENT OPERATION

- 7. THE FLOUR MIXERS SHALL NOT OPERATE UNLESS VENTED TO THE APC ROTOCLONE.
- 8. THE ROTOCLONE SHALL NOT OPERATE UNLESS THE WATER SUPPLY IS ON.

RECORD KEEPING

NONE (BECAUSE MAXIMUM ALLOWABLE EMISSIONS ARE BASED ON MAXIMUM CAPACITY, 24 HOURS/DAY AND 92 DAYS/QUARTER.

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO AIR QUALITY MANAGEMENT DISTRICT (AQMD), 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>AQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
401	RINGELMANN CHART
404	PARTICULATE MATTER

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE 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 AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.



AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

ISSUED TO: **CAMPBELL SOUP SUPPLY COMPANY, LLC**

EQUIPMENT LOCATION: **6200 FRANKLIN BLVD., SACRAMENTO, 95824**

PERMIT NO.	EQUIPMENT DESCRIPTION
18710	APC ROTOCLONE, MODEL NO. 846493-3, SERIAL NO. W05-0059, SERVING ROCK SALT STORAGE AND HANDLING SYSTEM. CONSISTING OF THE FOLLOWING: AMERICAN AIR FILTER, TYPE W, SIZE NO. 12, 3,000 ACFM, 10 HP.

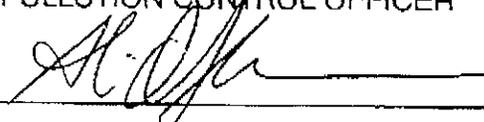
SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED.
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 PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT 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 AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

DATE ISSUED: 03-07-2006
DATE EXPIRES: 02-24-2007 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: 

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

EMISSIONS LIMITATIONS

- THE EQUIPMENT SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH ARE AS DARK OR DARKER THAN RINGELMANN NO. 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.
- THE EMISSIONS FROM THE EQUIPMENT SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR (A)	MAXIMUM ALLOWABLE EMISSIONS (B)
	GRAINS/DSCF	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.

EQUIPMENT OPERATION

- THE ROCK SALT STORAGE AND HANDLING SYSTEM SHALL NOT OPERATE UNLESS VENTED TO THE APC ROTOCLONE.
- THE ROTOCLONE SHALL NOT OPERATE UNLESS THE WATER SUPPLY IS ON.

RECORD KEEPING

NONE (BECAUSE MAXIMUM ALLOWABLE EMISSIONS ARE BASED ON MAXIMUM CAPACITY, 24 HOURS/DAY AND 92 DAYS/QUARTER.)

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO AIR QUALITY MANAGEMENT DISTRICT (AQMD), 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>AQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
401	RINGELMANN CHART
404	PARTICULATE MATTER

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE 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 AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.



AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

ISSUED TO: **CAMPBELL SOUP SUPPLY CO., LLC**

EQUIPMENT LOCATION: 6200 FRANKLIN BLVD, SACRAMENTO

PERMIT NO.: **14634** EQUIPMENT DESCRIPTION:
IC ENGINE STANDBY, MAKE: CUMMINS, MODEL: V-378-F2, SERIAL NO.:
20216434, 136 BHP, DIESEL FIRED, DRIVING AN EMERGENCY
STANDBY FIRE PUMP

SUBJECT TO THE FOLLOWING CONDITIONS

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED
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 PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT 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 AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSION LIMITATIONS

5. THE IC ENGINE SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS 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 RINGLEMANN 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

DATE ISSUED: 5/24/2000
DATE AMENDED: 12/31/05
EXPIRATION DATE: 2/24/2006 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY:

Julio Lukashovskiy

6. THE EMISSIONS FROM THE IC ENGINE SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR	BASIS FOR EMISSION FACTOR	MAXIMUM ALLOWABLE EMISSIONS (A)	
			POUNDS/QUARTER	POUNDS/YEAR
ROC	1.14	AP-42	68	68
NOx	14	AP-42	840	840
SOx	0.16	0.05% SULFUR CONTENT	10	10
PM10	1.00	AP-42	60	68
CO	3.03	AP-42	182	182
HC+NOx	N/A	N/A	N/A	N/A

(A) EMISSIONS ARE BASED ON 136 BHP, 200 HOURS/QUARTER AND 200 HOURS/YEAR OF OPERATION.

EQUIPMENT OPERATION

7. THE IC ENGINE SHALL OPERATE ONLY FOR THE FOLLOWING PURPOSES AND SHALL NOT OPERATE MORE THAN THE FOLLOWING HOURS:

TYPE OF OPERATIONAL HOURS	MAXIMUM ALLOWABLE OPERATION		
	HOURS/DAY	HOURS/QUARTER	HOURS/YEAR
MAINTENANCE PURPOSES (A)			
WEEKLY TESTING - NFPA 25, SEC. 5-3.2.2	0.5		
ANNUAL TESTING (NO FLOW) - NFPA 25, SEC 5-3.3.2.1	1		
ANNUAL TESTING (FLOW) - NFPA 25, SEC. 5-3.3.1	1	40	40
QUARTERLY - NFPA 25, SEC. 9-5.2.1	0.5		
EVERY FIVE YEARS - NFPA 25, SEC 9-5.2.2	4		
ALL OPERATION - MAINTENANCE (A) AND EMERGENCY (B)	24	200	200

(A) MAINTENANCE PURPOSES IS DEFINED AS: THE NECESSARY OPERATION OF AN IC ENGINE IN ORDER TO COMPLY WITH THE TESTING REQUIREMENTS OF THE NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 25 - "STANDARDS FOR INSPECTION, TESTING, AND MAINTENANCE OF WATER-BASED FIRE PROTECTION SYSTEMS," 1998 EDITION OR WHEN REQUIRED BY THE DISTRICT TO VERIFY COMPLIANCE WITH THE APPLICABLE RULES AND REGULATIONS.

(B) EMERGENCY IS DEFINED AS: WHEN A FIRE IS DETECTED AND THE FIRE PUMP IS OPERATED TO SUPPLY WATER FOR FIRE SUPPRESSION.

8. THE IC ENGINE SHALL BE EQUIPPED WITH A NON-RESETTING HOUR METER, WITH A MINIMUM DISPLAY CAPABILITY OF 999 HOURS, TO ENSURE COMPLIANCE WITH CONDITION NUMBERS 6 AND 7.
9. UPON REQUEST OF THE AIR POLLUTION CONTROL OFFICER OR DESIGNEE, ONCE EACH YEAR, DURING DAYLIGHT HOURS, THE IC ENGINE SHALL BE RUN AT MAXIMUM ANTICIPATED LOAD, FROM A COLD START CONDITION, FOR OBSERVATION OF COMPLIANCE WITH OPACITY LIMITATIONS.
10. THE IC ENGINE SHALL BE FUELED WITH CARB DIESEL FUEL, OR AN ALTERNATIVE DIESEL FUEL THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE (AS CODIFIED IN TITLE 13, CCR, SECTIONS 2700-2710), OR AN ALTERNATIVE FUEL, OR CARB DIESEL FUEL USED WITH FUEL ADDITIVES THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE, OR ANY COMBINATION OF FUELS LISTED IN THIS CONDITION.

RECORD KEEPING

505392

11. THE FOLLOWING RECORDS SHALL BE CONTINUOUSLY MAINTAINED ONSITE FOR THE MOST RECENT THREE YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE AIR POLLUTION CONTROL OFFICER UPON REQUEST. MONTHLY, QUARTERLY, AND YEARLY RECORDS SHALL BE MADE AVAILABLE WITHIN 30 DAYS OF END OF REPORTING PERIOD.

FREQUENCY	INFORMATION TO BE RECORDED
WHEN OPERATED	A. DATE. B. PURPOSE - EITHER MAINTENANCE (M) OR EMERGENCY (E). C. NUMBER OF HOURS OF OPERATION.
WHEN OPERATED FOR MAINTENANCE	D. WHEN OPERATING FOR MAINTENANCE PURPOSES, THE DAILY RECORD SHALL ALSO INCLUDE THE TYPE OF MAINTENANCE PERFORMED: 1. WEEKLY RUN (NFPA 25, SEC. 5-3.2.2) 2. ANNUAL NO FLOW TEST (NFPA 25, SEC 5-3.3.2.1) 3. ANNUAL FLOW TEST (NFPA 25, SEC 5-3.3.1) 4. QUARTERLY TEST (NFPA 25, SEC 9-5.2.1) 5. QUINCENNIAL (EVERY 5 YEARS) TESTING (NFPA 25, SEC 9-5.2.2) 6. REQUIRED BY AIR DISTRICT 7. REPAIR VERIFICATION (DESCRIBE REPAIR PERFORMED)
MONTHLY	E. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
QUARTERLY	F. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/CALENDAR QUARTER).
YEARLY	G. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/YEAR).
ALL FUEL DELIVERIES	H. RETAIN FUEL PURCHASE RECORDS THAT ACCOUNT FOR ALL FUEL PURCHASED FOR USE IN THE ENGINE. FUEL PURCHASE RECORDS SHALL INCLUDE: 1. IDENTIFICATION OF TYPE OF FUEL (I.E. CARB DIESEL, ALTERNATE DIESEL, ETC.) 2. QUANTITY OF FUEL PURCHASED. 3. DATE OF FUEL PURCHASE. 4. SIGNATURE OF PERSON RECEIVING FUEL. 5. SIGNATURE OF FUEL PROVIDER INDICATING THAT FUEL WAS DELIVERED.

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (AQMD), 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>AQMD RULE NUMBER</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
401	RINGELMANN CHART
406	SPECIFIC CONTAMINANTS
420	SULFUR CONTENT OF FUELS
904	AIR TOXICS CONTROL MEASURES - STATIONARY COMPRESSION IGNITION ENGINES

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 AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.

SACRAMENTO METROPOLITAN



PERMIT TO OPERATE

ISSUED TO: **CAMPBELL SOUP SUPPLY COMPANY, LLC**

EQUIPMENT LOCATION: 6200 FRANKLIN BLVD., SACRAMENTO, CA 95824

PERMIT NO.	EQUIPMENT DESCRIPTION
21074	IC ENGINE STANDBY, MAKE: CUMMINS, MODEL: CFP83-F40, SERIAL NO.: 46893638 (DIESEL #2), 288 BHP @ 1,760 RPM, 505 IN ³ DISPLACEMENT, DIESEL FIRED, DRIVING AN EMERGENCY WATER PUMP

SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED.
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 PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION, OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT 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 AIR QUALITY MANAGEMENT DISTRICT.
4. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSIONS LIMITATIONS

5. THE IC ENGINE SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH ARE AS DARK OR DARKER THAN RINGELMANN NO. 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

DATE ISSUED: 08-12-2008
DATE EXPIRES: 02-24-2009 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: 

PERMIT NO.: 21074

PAGE 1 OF 4 PAGES

REVOCABLE AND NON-TRANSFERABLE

SACRAMENTO METROPOLITAN
 AIR QUALITY MANAGEMENT DISTRICT

6. THE EMISSIONS FROM THE IC ENGINE SHALL NOT EXCEED THE FOLLOWING LIMITS:

POLLUTANT	EMISSION FACTOR(A) G/HP-HR	MAXIMUM ALLOWABLE EMISSIONS (B)	
		LB/QUARTER	LB/YEAR
ROC	1.0	127	127
NO _x	4.9	622	622
ROC + NO _x (C)	4.9	622	622
SO _x	0.1645	21	21
PM10	0.149	19	19
CO	3.7	330	330

- (A) EMISSION FACTORS FOR ROC, NO_x, ROC + NO_x, AND CO ARE BASED ON BACT STANDARDS. PM EMISSIONS ARE BASED ON T-BACT STANDARDS. SO_x EMISSIONS ARE BASED ON 0.05% SULFUR BY WEIGHT IN THE FUEL.
 (B) EMISSIONS BASED ON 288 HP, 200 HOURS/QUARTER AND 200 HOURS/YEAR OF OPERATION.
 (C) THE ENGINE IS REQUIRED TO COMPLY WITH THE COMBINED NO_x + ROC EMISSION STANDARD. FOR THE PURPOSE OF CALCULATING NO_x AND ROC INDIVIDUALLY, ROC EMISSIONS ARE ASSESSED AT THE WORSE CASE SCENARIO OF THE UNCONTROLLED AP-42 EMISSION FACTOR OF 1.0 G/HP-HR AND NO_x EMISSIONS ARE ASSESSED AT THE WORSE CASE LIMIT OF 4.9 G/HP-HR. BACT IS ONLY TRIGGERED FOR INDIVIDUAL POLLUTANTS.

EQUIPMENT OPERATION

7. THE IC ENGINE SHALL OPERATE ONLY FOR THE FOLLOWING PURPOSES AND SHALL NOT OPERATE MORE THAN THE FOLLOWING HOURS:

TYPE OF OPERATIONAL HOURS	MAXIMUM ALLOWABLE OPERATION	
	HOURS/QUARTER	HOURS/YEAR
MAINTENANCE PURPOSES (A) WEEKLY TESTING – NFPA 25, SEC. 5-3.2.2 ANNUAL TESTING (NO FLOW) – NFPA 25, SEC. 5-3.3.2.1 ANNUAL TESTING (FLOW) – NFPA 25, SEC. 5-3.3.1 QUARTERLY – NFPA 25, SEC. 9-5.2.1 EVERY FIVE YEARS – NFPA 25, SEC. 9-5.2.2	40	40
ALL OPERATION - MAINTENANCE (A) AND EMERGENCY (B)	200	200

- (A) MAINTENANCE PURPOSES IS DEFINED AS: THE OPERATION OF AN IC ENGINE IN ORDER TO COMPLY WITH THE TESTING REQUIREMENTS OF THE NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 25 – "STANDARDS FOR INSPECTION, TESTING, AND MAINTENANCE OF WATER-BASED FIRE PROTECTION SYSTEMS," 2002 EDITION OR WHEN REQUIRED BY THE DISTRICT TO VERIFY COMPLIANCE WITH THE APPLICABLE RULES AND REGULATIONS.
 (B) EMERGENCY IS DEFINED AS: WHEN A FIRE IS DETECTED AND THE FIRE PUMP IS OPERATED TO SUPPLY WATER FOR FIRE SUPPRESSION.

8. THE IC ENGINE SHALL BE EQUIPPED WITH A NON-RESETTING HOUR METER, WITH A MINIMUM DISPLAY CAPABILITY OF 9,999 HOURS, TO ENSURE COMPLIANCE WITH CONDITION NUMBERS 6 AND 7.
 9. UPON REQUEST OF THE AIR POLLUTION CONTROL OFFICER, ONCE EACH YEAR, DURING DAYLIGHT HOURS, THE IC ENGINE SHALL BE RUN AT MAXIMUM ANTICIPATED LOAD, FROM A COLD START CONDITION, FOR OBSERVATION OF COMPLIANCE WITH OPACITY LIMITATIONS.
 10. THE IC ENGINE SHALL BE FUELED WITH CARB DIESEL FUEL, OR AN ALTERNATIVE DIESEL FUEL THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE (AS CODIFIED IN TITLE 13, CCR, SECTIONS 2700-2710), OR AN ALTERNATIVE FUEL, OR CARB DIESEL FUEL USED WITH FUEL ADDITIVES THAT MEETS THE REQUIREMENTS OF THE VERIFICATION PROCEDURE, OR ANY COMBINATION OF FUELS LISTED IN THIS CONDITION.

SACRAMENTO METROPOLITAN
 AIR QUALITY MANAGEMENT DISTRICT

RECORD KEEPING

11. THE FOLLOWING RECORD SHALL BE CONTINUOUSLY MAINTAINED ONSITE FOR THE MOST RECENT THREE YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE AIR POLLUTION CONTROL OFFICER UPON REQUEST. QUARTERLY AND YEARLY RECORDS SHALL BE MADE AVAILABLE WITHIN 30 DAYS FOLLOWING THE END OF THE QUARTER AND YEAR RESPECTIVELY.

FREQUENCY	INFORMATION TO BE RECORDED
WHEN OPERATED	A. DATE. B. PURPOSE – EITHER MAINTENANCE (M) OR EMERGENCY POWER (E). C. NUMBER OF HOURS OF OPERATION.
WHEN OPERATED FOR MAINTENANCE	D. WHEN OPERATING FOR MAINTENANCE PURPOSES, THE DAILY RECORD SHALL ALSO INCLUDE THE TYPE OF MAINTENANCE PERFORMED: 1. WEEKLY RUN (NFPA 25, SEC. 5-3.2.2) 2. ANNUAL NO FLOW TEST (NFPA 25, SEC. 5-3.3.2.1) 3. ANNUAL FLOW TEST (NFPA 25, SEC. 5-3.3.1) 4. QUARTERLY TEST (NFPA 25, SEC. 9-5.2.1) 5. QUINCENNIAL (EVERY FIVE YEARS) TESTING (NFPA 25, SEC. 9-5.2.2) 6. REQUIRED BY AIR DISTRICT 7. REPAIR VERIFICATION (DESCRIBE REPAIR PERFORMED)
MONTHLY	E. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/MONTH).
QUARTERLY	F. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/QUARTER).
YEARLY	G. TOTAL NUMBER OF HOURS OF OPERATION FOR EACH OPERATING MODE (HOURS/YEAR).
ALL FUEL DELIVERIES	H. RETAIN FUEL PURCHASE RECORDS THAT ACCOUNT FOR ALL FUEL PURCHASED FOR USE IN THE ENGINE. FUEL PURCHASE RECORDS SHALL INCLUDE: 1. IDENTIFICATION OF TYPE OF FUEL (I.E. CARB DIESEL, ALTERNATE DIESEL, ETC.) 2. QUANTITY OF FUEL PURCHASED. 3. DATE OF FUEL PURCHASE. 4. SIGNATURE OF PERSON RECEIVING FUEL. 5. SIGNATURE OF FUEL PROVIDER INDICATING THAT FUEL WAS DELIVERED.

SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

YOUR APPLICATION FOR THIS AIR QUALITY AUTHORITY TO CONSTRUCT WAS EVALUATED FOR COMPLIANCE WITH SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (AQMD), 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>AQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
301	PERMIT FEES – STATIONARY SOURCE
401	RINGELMANN CHART
402	NUISANCE
406	SPECIFIC CONTAMINANTS
420	SULFUR CONTENT OF FUELS
904	AIR TOXICS CONTROL MEASURES – STATIONARY COMPRESSION IGNITION ENGINES

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 AQMD RULEBOOK OR CONTACT THE AQMD FOR ASSISTANCE.

SACRAMENTO METROPOLITAN



AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

ISSUED TO: **CAMPBELL SOUP SUPPLY COMPANY**
EQUIPMENT LOCATION: **6200 FRANKLIN BOULEVARD, SACRAMENTO 95824**

PERMIT NO.	EQUIPMENT DESCRIPTION
22542	INKJET PRINTING OPERATION CONSISTING OF VARIOUS MANUFACTURER AND VARIOUS MODEL NUMBER INKJET PRINTERS

SUBJECT TO THE FOLLOWING CONDITIONS

GENERAL

1. ALL EQUIPMENT, FACILITIES AND SYSTEMS INSTALLED OR USED TO ACHIEVE COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE SHALL AT ALL TIMES BE MAINTAINED IN GOOD WORKING ORDER AND BE OPERATED AS EFFICIENTLY AS POSSIBLE SO AS TO MINIMIZE AIR POLLUTANT EMISSIONS.
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 PERMIT TO OPERATE, AND
 - B. AT REASONABLE TIMES TO HAVE ACCESS TO AND COPY ANY RECORDS REQUIRED TO BE KEPT UNDER TERMS AND CONDITIONS OF THIS PERMIT TO OPERATE, AND
 - C. TO INSPECT ANY EQUIPMENT, OPERATION OR METHOD REQUIRED IN THIS PERMIT TO OPERATE, AND
 - D. TO SAMPLE EMISSIONS FROM THE SOURCE OR REQUIRE SAMPLES TO BE TAKEN.
3. THIS PERMIT 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 SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT.

DATE ISSUED: 01-18-2011
DATE EXPIRES: 02-24-2012 (UNLESS RENEWED)

LARRY GREENE
AIR POLLUTION CONTROL OFFICER

BY: Bruce Nixon

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

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.
5. A LEGIBLE COPY OF THIS PERMIT TO OPERATE SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSIONS LIMITATIONS

6. THE INKJET PRINTING OPERATION SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH ARE AS DARK OR DARKER THAN RINGELMANN NO. 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.
7. EMISSIONS FROM THE INKJET PRINTING OPERATION SHALL NOT EXCEED THE FOLLOWING LIMIT:

POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS	
	LB/DAY (A)	LB/QUARTER
ROC	82	1,500

(A) THE DAILY ROC LIMIT IS BASED ON ALL PRINTERS (26 PRESENT AT THE TIME OF INITIAL PERMITTING) EMITTING ROC AT MAXIMUM CAPACITY FOR 24 HOURS/DAY.

8. COMPLIANCE WITH THE QUARTERLY EMISSION LIMITATION SPECIFIED IN CONDITION NO. 7 SHALL BE DETERMINED AS FOLLOWS:

$$\begin{aligned} \text{ROC EMISSIONS} = & (\text{INKS USED, GAL/QUARTER}) \times (\text{VOC CONTENT, LB/GAL}) \\ (\text{LB/QUARTER}) & + (\text{MAKE-UP FLUID USED, GAL/QUARTER}) \times (\text{VOC CONTENT, LB/GAL}) \\ & + (\text{CLEANING SOLUTION USED, GAL/QUARTER}) \times (\text{VOC CONTENT, LB/GAL}) \end{aligned}$$

EQUIPMENT OPERATION

9. EACH INK JET PRINTER SHALL BE OPERATED AND MAINTAINED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS.
10. ALL VOC-CONTAINING CLOTH OR PAPER USED FOR SURFACE PREPARATION OR EQUIPMENT CLEANUP SHALL BE STORED OR DISPOSED OF IN CLOSED CONTAINERS.

RECORD KEEPING

11. THE FOLLOWING RECORDS SHALL BE CONTINUOUSLY MAINTAINED ON-SITE FOR THE MOST RECENT FIVE-YEAR PERIOD AND SHALL BE MADE AVAILABLE TO THE SMAQMD AIR POLLUTION CONTROL OFFICER UPON REQUEST. QUARTERLY RECORDS AS SPECIFIED IN THE TABLE BELOW SHALL BE MADE AVAILABLE FOR INSPECTION WITHIN 30 DAYS FROM THE END OF THE CALENDAR QUARTER.

FREQUENCY	INFORMATION TO BE RECORDED
AT ALL TIMES	A. LIST OF CURRENTLY USED MATERIALS, INCLUDING THE FOLLOWING INFORMATION: I. MATERIAL TYPE BY NAME, CODE AND MANUFACTURER. II. VOC CONTENT OF EACH INK, MAKE-UP FLUID AND CLEANING SOLVENT AS-APPLIED INCLUDING WATER AND EXEMPT COMPOUNDS (GRAMS/LITER OR LB/GAL).
DAILY	B. DAILY RECORDS ARE NOT REQUIRED BECAUSE ALL PRINTERS ARE PERMITTED AT MAXIMUM CAPACITY FOR 24 HOURS/DAY.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

FREQUENCY	INFORMATION TO BE RECORDED
QUARTERLY	C. USAGE OF EACH INK, MAKE-UP FLUID AND CLEANING SOLVENT AS-APPLIED INCLUDING WATER AND EXEMPT COMPOUNDS. [GALLONS/QUARTER] D. CALCULATION OF ROC EMISSIONS BY THE METHOD SPECIFIED IN CONDITION NO. 8. [LB ROC/QUARTER]

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<u>SMAQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
301	STATIONARY SOURCE PERMIT FEES
401	RINGELMANN CHART
402	NUISANCE

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE 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.

