



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

FEB 16 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # N-355
Project # N-1084122

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. General Mills is proposing a Title V minor permit modification to incorporate the recently issued N-355-5-4 into the Title V operating permit. The changes authorized by the ATC were the replacement of a dust collection hood for improved collection efficiency, the installation of a wet-type centrifugal collector for particulate matter control and the addition of weigh cells, a product densifier and box handling rollers.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-355-5-4, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW: MJS/cm

Enclosures

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region

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

Central Region (Main Office)

1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region

34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

FEB 16 2010

Wade Broughton
General Mills
PO Box 3002
Lodi, CA 95241

**Re: Notice of Minor Title V Permit Modification
District Facility # N-355
Project # N-1084122**

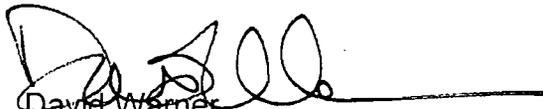
Dear Mr. Broughton:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-355-5-4 into the Title V operating permit. The changes authorized by the ATC were the replacement of a dust collection hood for improved collection efficiency, the installation of a wet-type centrifugal collector for particulate matter control and the addition of weigh cells, a product densifier and box handling rollers.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-355-5-4, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

DW: MJS/cm

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1084122

Engineer: Mark Schonhoff
Date: February 10, 2010

Facility Number: N-355
Facility Name: General Mills
Mailing Address: PO Box 3002
Lodi, CA 95241

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

Responsible Official: Carson Funderburk
Title: Plant Manager

I. PROPOSAL

General Mills is proposing a Minor Modification to their Title V permit to incorporate Authority to Construct (ATC) N-355-5-4 into the current Title V permit, which is N-355-5-3. The changes authorized by the ATC were the replacement of a dust collection hood for improved collection efficiency, the installation of a wet-type centrifugal collector for particulate matter control and the addition of weigh cells, a product densifier and box handling rollers. ATC N-355-5-4 was issued without a Certificate of Conformity, therefore, a Title V modification was logged in under N-355-5-6 (a Title V renewal action was previously logged in under N-355-5-5).

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

II. FACILITY LOCATION

2000 W. Turner Road
Lodi, CA

III. EQUIPMENT DESCRIPTION

CEREAL PLANT PACKAGING SYSTEM: TWIN PACK LINE A SERVED BY A FLEX-KLEEN MODEL 20 PCBK3 III DUST COLLECTOR (AC-48), TWIN PACK LINE B SERVED BY A FLEX-KLEEN MODEL 20 PCBL3 III DUST COLLECTOR (AC-49), 8 SCALES SERVED BY 4 BOEDECKER MODEL DC-58-144-3B DUST COLLECTORS (2 SCALES/DUST COLLECTOR), 8 BAGGERS EACH SERVED BY A DEDICATED BOEDECKER MODEL RDP-25-3-3-B DUST COLLECTOR, WHICH ARE ALL VENTED TO A FLEX-KLEEN CYCLONIC RECEIVER WITH SOCK FILTER (AC-89), CEREAL FILLING STATION (A-104) SERVED BY A DUST COLLECTION HOOD VENTED TO AN AMERICAN AIR FILTER MODEL B WET TYPE ROTOCLONE COLLECTOR (AC-104)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permit is considered to be a Minor Modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

General Mills received Authority to Construct N-355-5-4, which authorized the replacement of a dust collection hood for improved collection efficiency, the installation of a wet-type centrifugal collector for particulate matter control and the addition of weigh cells, a product densifier and box handling rollers. General Mills is now proposing to incorporate this Authority to Construct into the facility Title V permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for

- temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
 5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

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

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Draft Title V Operating Permit N-355-5-6
- B. Authority to Construct N-355-5-4
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit N-355-5-3

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-355-5-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-355-5-6

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

CEREAL PLANT PACKAGING SYSTEM: TWIN PACK LINE A SERVED BY A FLEX-KLEEN MODEL 20 PCBK3 III DUST COLLECTOR (AC-48), TWIN PACK LINE B SERVED BY A FLEX-KLEEN MODEL 20 PCBL3 III DUST COLLECTOR (AC-49), 8 SCALES SERVED BY 4 BOEDECKER MODEL DC-58-144-3B DUST COLLECTORS (2 SCALES/DUST COLLECTOR), 8 BAGGERS EACH SERVED BY A DEDICATED BOEDECKER MODEL RDP-25-3-3-B DUST COLLECTOR, WHICH ARE ALL VENTED TO A FLEX-KLEEN CYCLONIC RECEIVER WITH SOCK FILTER (AC-89), CEREAL FILLING STATION (A-104) SERVED BY A DUST COLLECTION HOOD VENTED TO AN AMERICAN AIR FILTER MODEL B WET TYPE ROTOCLONE COLLECTOR (AC-104)

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Visible emissions from each dust collector (wet or dry) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from baghouses and cyclones that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Dust collection systems shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Baghouse dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. PM10 emissions from this permit unit shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Permit Unit Requirements for N-355-5-6 (continued)

Page 2 of 2

12. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour. (amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least five years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct
N-355-5-4



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-355-5-4

ISSUANCE DATE: 09/17/2008

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

LOCATION: WADE BROUGHTON
2000 W TURNER ROAD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

MODIFICATION OF: CEREAL PLANT PACKAGING SYSTEM SERVED BY TWO BAGHOUSES: TO INSTALL A NEW DUST COLLECTION HOOD WHICH IS SERVED BY A NEW AMERICAN AIR FILTER MODEL B WET TYPE ROTOCONE COLLECTOR, INSTALL WEIGH CELLS AND PRODUCT DENSIFIER AND BOX HANDLING ROLLERS. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BECOME: CEREAL PLANT PACKAGING SYSTEM: TWIN PACK LINE A SERVED BY A FLEX-KLEEN MODEL 20 PCBK3 III DUST COLLECTOR (AC-48), TWIN PACK LINE B SERVED BY A FLEX-KLEEN MODEL 20 PCBK3 III DUST COLLECTOR (AC-49), 8 SCALES SERVED BY 4 BOEDECKER MODEL DC-58-144-3B DUST COLLECTORS (2 SCALES/DUST COLLECTOR), 8 BAGGERS EACH SERVED BY A DEDICATED BOEDECKER MODEL RDP-25-3-3-B DUST COLLECTOR, WHICH ARE ALL VENTED TO A FLEX-KLEEN CYCLONIC RECEIVER WITH SOCK FILTER (AC-89), CEREAL FILLING STATION (A-104) SERVED BY A DUST COLLECTION HOOD VENTED TO AN AMERICAN AIR FILTER MODEL B WET TYPE ROTOCONE COLLECTOR (AC-104)

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadreidin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-355-5-4 - Sep 17 2008 8:15 AM - PERCEN Joint Inspection NOT Required

Conditions for N-355-5-4 (continued)

Page 2 of 2

5. Visible emissions from each dust collector (wet or dry) shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. Visible emissions from baghouses and cyclones that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Dust collection systems shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Baghouse dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. PM10 emissions from this permit unit shall not exceed 0.3 lb/day. [District Rule 2201]
10. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit and permit requirement. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. [District Rules 1070 and 2201]
11. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour. (amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least five years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
14. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

ATC	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
N-355-5-4	0	0	0	0	-547
TOTAL	0	0	0	0	-547

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Received

NOV 03 2008

Permits Srvc
SJVAPCD

Permit Application For:

ADMINISTRATIVE AMENDMENT

MINOR MODIFICATION

SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>General Mills Operations, Inc.</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2000 W Turner Rd P.O. Box 3002</u> CITY: <u>Lodi</u> STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>95241-1906</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2000 W Turner Rd</u> CITY: <u>Lodi</u> _____% SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE
4. GENERAL NATURE OF BUSINESS: <u>Cereal & Baking mix manufacturer</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #s if known, and use additional sheets if necessary) <u>N-355-5-4 Modification of Cereal Plant Packaging System to install a new dust collection hood which is served by an new American Air Filter Model B Wet Type Rotoclone Collector, install weigh cells, product densifier, and box handling rollers. District project number N-1083089.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Carson Funderburk</u> Contact: <u>Wade Broughton</u>	TITLE OF APPLICANT: <u>Plant Manager</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>9/22/07</u> PHONE: <u>209-334-7090</u> FAX: EMAIL: <u>wade.broughton@genmills.com</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK # _____
	DATE PAID: _____
	PROJECT NO: <u>N-1084122</u> FACILITY ID: <u>N-355</u>

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE AMENDMENT

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

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

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

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

Carson D. Funderburk

Signature of Responsible Official

September 22, 2008

Date

Carson Funderburk

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
N-355-5-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-355-5-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

CEREAL PLANT PACKAGING SYSTEM SERVED BY TWO BAGHOUSES.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions from the fabric filter(s) serving this operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions from baghouses and cyclones that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Dust collection systems shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Baghouse dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour. (amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit
9. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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