



NOV 19 2013

Mr. Robert Murr
Post Foods LLC
901 E Whitmore Ave
Modesto, CA 95358-9408

Re: Notice of Minor Title V Permit Modification
District Facility # N-1933
Project # N-1133494

Dear Mr. Murr:

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-1933-28-0 into the Title V operating permit. The proposed project was to install a grape nut in-lay system, which includes the following equipment: additive (soy based protein, dried almonds, etc.) tote dumper, surge bins, weigh scales, moveable weigh bins, bucket elevators, vibratory feeders and conveying equipment, receiving cyclone, and a dust collector.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1933-28-0, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

Title V APPLICATION REVIEW Minor Modification

Facility Number: N-1933
Facility Name: Post Foods, LLC
Mailing Address: 901 E Whitmore Ave
Modesto, CA 95358-9408

Contact Name: Bob Murr
Phone: (209) 541-3455

Responsible Official: Larry Mitchell
Title: Plant Manager

Processing Staff: Jag Kahlon
Project Number: N-1133494
Date: October 31, 2013

I. PROPOSAL

Post Foods LLC has proposed to incorporate Authority to Construct (ATC) permit N-1933-28-0 into their Title V operating permit. The ATC permit was issued without Certificate of Conformity (COC). The proposed project was to install a grape nut in-lay system, which includes the following equipment: additive (soy based protein, dried almonds, etc.) tote dumper, surge bins, weigh scales, moveable weigh bins, bucket elevators, vibratory feeders and conveying equipment, receiving cyclone, and a dust collector.

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

II. FACILITY LOCATION

This facility is located at 901 E Whitmore Ave, Modesto, California.

III. EQUIPMENT DESCRIPTION

N-1933-28-1:
GRAPE NUT IN-LAY SYSTEM

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification under Rule 2520 as project was not an SB-288 or a Federal Major Modification under Rule 2201. Therefore, public review is not required.

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The proposed system is used to blend soy based protein, dried almonds, dried strawberry and reworked grape nuts¹ into the grape nut stream. This system operates independent of the existing units in grape nut lines under permit N-1933-4 and the tack system under permit N-1933-21. Therefore, the proposed system was given a separate permit.

VII. COMPLIANCE

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

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; 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.

¹ Occasionally, due to packaging equipment malfunction, they have to open grape nut bags and dump the cereal in big totes; this cereal (reworked grape nuts) will be re-introduced in the proposed grape nut in-lay system.

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

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

Compliance is expected with this Rule.

APPENDICES

Appendix I: Proposed Title V Operating Permit No. N-1933-28-1

Appendix II: Authority to Construct N-1933-28-0

Appendix III: Permit Application

Appendix IV: Emissions Change

Appendix I
Proposed Title V Operating Permit No. N-1933-28-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1933-28-1

EXPIRATION DATE: 07/31/2017

EQUIPMENT DESCRIPTION:
GRAPE NUT IN-LAY SYSTEM

DRAFT

PERMIT UNIT REQUIREMENTS

1. **GRAPE NUT IN-LAY SYSTEM:** This system includes 1 additive tote dumper, 1 existing rework tote dumper, 2 Deamco model BES-09P-T-X-SS-SST and BEM-18P-T-X-SS-SST bucket elevators, 1 additive surge bin, 1 grape nut base bin, 1 rework surge bin, 3 vibratory conveyors, 1 belt conveyor, 3 weigh scales, 3 weigh bins on wheels, 1 Mac Process Equipment CT-17 receiving cyclone, and a Donaldson Torit TBI-15 dust collector. The additive surge bin, grape nut base bin, rework surge bin, vibratory conveyors, belt conveyor, bucket elevators, and the receiving cyclone are served a Donaldson Torit TBI-15 dust collector. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions at the exhaust of the dust collector 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. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The differential pressure, as indicated by the pressure differential gauge on the dust collector, shall stay between 1.5 to 10 inches of water column, when the grape nut in-lay system operates. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The total amount of finished product through the grape nut in-lay system (i.e., grape nuts, grape nuts additives, and reworked grape nuts) shall not exceed 160 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The total PM10 emissions from the system covered under this permit shall not exceed 0.057 pounds per ton of the total amount of finished product through the grape nut in-lay system. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall keep records of date and the total amount of finished product through the grape nut in-lay system. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Differential operating pressure shall be monitored and recorded on each day that the grape nut in-lay system operates. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070] Federally Enforceable Through Title V Permit

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

DRAFT

Appendix II
Authority to Construct N-1933-28-0



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1933-28-0

ISSUANCE DATE: 10/15/2012

LEGAL OWNER OR OPERATOR: POST FOODS, LLC
MAILING ADDRESS: 901 E WHITMORE AVE
MODESTO, CA 95358-9408

LOCATION: 901 E WHITMORE
MODESTO, CA 95358

EQUIPMENT DESCRIPTION:
GRAPE NUT IN-LAY SYSTEM

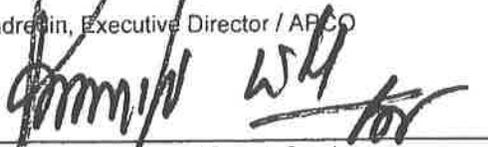
CONDITIONS

1. **GRAPE NUT IN-LAY SYSTEM:** This system includes 1 additive tote dumper, 1 existing rework tote dumper, 2 Deamco model BES-09P-T-X-SS-SST and BEM-18P-T-X-SS-SST bucket elevators, 1 additive surge bin, 1 grape nut base bin, 1 rework surge bin, 3 vibratory conveyors, 1 belt conveyor, 3 weigh scales, 3 weigh bins on wheels, 1 Mac Process Equipment CT-17 receiving cyclone, and a Donaldson Torit TBI-15 dust collector. The additive surge bin, grape nut base bin, rework surge bin, vibratory conveyors, belt conveyor, bucket elevators, and the receiving cyclone are served a Donaldson Torit TBI-15 dust collector. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Visible emissions at the exhaust of the dust collector 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. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start-up inspection. The established range shall be listed in the Permit to Operate. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadreghin, Executive Director / APCD



DAVID WARNER, Director of Permit Services

N-1933-28-0 : Oct 15, 2012 8:44AM - KAHLONU : Joint Inspection NOT Required

8. The total amount of finished product through the grape nut in-lay system (i.e., grape nuts, grape nuts additives, and reworked grape nuts) shall not exceed 160 tons in any one day. [District Rule 2201]
9. The total PM10 emissions from the system covered under this permit shall not exceed 0.057 pounds per ton of the total amount of finished product through the grape nut in-lay system. [District Rule 2201]
10. The permittee shall keep records of date and the total amount of finished product through the grape nut in-lay system. [District Rule 2201]
11. Differential operating pressure shall be monitored and recorded on each day that the grape nut in-lay system operates. [District Rule 2201]
12. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]
13. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070]

Appendix III
Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

COPY

Permit Application For:

[] ADMINISTRATIVE AMENDMENT MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>Post Foods LLC</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>901 E Whitmore Ave.</u> CITY: <u>Modesto</u> STATE: <u>CA</u> ZIP CODE: <u>95358-9408</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>901 E Whitmore Ave</u> CITY: <u>Modesto</u> ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>Cereal Breakfast Foods</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Incorporate the "Grape Nut In-Lay System" Authority to Construct N-1933-28-0 into the facility Title V N-1933 facility operating permit.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Robert Murr</u>	TITLE OF APPLICANT: <u>Sr. Project Engineer</u>
7. SIGNATURE OF APPLICANT: <u>Robert E Murr.</u>	DATE: _____ PHONE: <u>(209) 541-3455</u> FAX: () EMAIL: <u>bob.murr@postfoods.com</u>

For APCD Use Only:

<p style="text-align: center; font-weight: bold; font-size: 1.2em;">RECEIVED</p> <p>DATE STAMP <u>OCT 30 2013</u></p> <p style="text-align: center;">SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: \$ _____ CHECK#: _____</p> <p>DATE PAID: _____</p> <p>PROJECT NO: _____ FACILITY ID: _____</p>
--	--

Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: <u>Post Foods, LLC</u>	FACILITY ID: <u>N-1933</u>
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:	
3. Agent to the Owner:	

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

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

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


Signature of Responsible Official

10/29/13
Date

Larry Mitchell
Name of Responsible Official (please print)

PLANT MANAGER.
Title of Responsible Official (please print)

Appendix IV
Emissions Change

Emissions Change

Emissions change under ATC project that resulted in ATC N-1933-28-0 is summarized in the following table.

Emissions Change			
Pollutant	Annual PE2 (lb/yr)	Annual PE1 (lb/yr)	Quarterly IPE (lb/qtr)
NOx	0	0	0
SOx	0	0	0
PM10	3,322	0	830.5
CO	0	0	0
VOC	0	0	0