

Facility Name: **Keebler Company – Sunshine Biscuits, Inc.**  
City: Columbus  
County: Muscogee  
AIRS #: 04-13-215-00050

Application #: TV-13449  
Date SIP Application Received: November 15, 2001  
Date Title V Application Received: November 15, 2001  
Date of Draft Permit:  
Permit No: 2052-215-0050-V-02-1

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the attached SIP permit to construct and/or draft/proposed operating permit amendment. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit amendment is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit amendment is to identify state and federal air requirements applicable to the modification/construction to be performed at Keebler Company – Sunshine Biscuits, Inc. and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit amendment and is presented in the same general order as the permit amendment. It initially describes the facility receiving the permit amendment, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit amendment in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description**

A. Existing Permits

The facility is currently operating under Title V Permit 2052-215-0050-V-02-1.

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2052-215-0050-V-02-0	January 19, 1999		X

Table 2: Comments on Specific Permits

Permit Number	Comments
	No Comments.

B. Regulatory Status

1. PSD/NSR

The facility has an emission limit of 249 tons of volatile organic compounds per twelve consecutive months to avoid PSD review.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Y			✓
PM <sub>10</sub>	Y			✓
SO <sub>2</sub>	Y			✓
VOC	Y	✓		
NO <sub>x</sub>	Y			✓
CO	Y			✓
TRS	N			✓
H <sub>2</sub> S	N			
Individual HAP	N			
Total HAPs	N			

**II. Proposed Modification**

A. Description of Modification

Keebler is going to install a new yeast leavened product line/oven. The oven will be fired by natural gas with propane as the back-up fuel. The oven is rated at 15.6MMBtu/hr.

B. Emissions Change

The installation and use of the new oven/line will not produce any significant change in actual emissions of any of the pollutants listed in Table 4 from the facility. The potential emissions of NO<sub>x</sub> and VOC are significant at 14.35 and 56.09 tons per year, respectively. The facility-wide VOC potential will not change because the facility will still be operating under the 249 ton per year PSD avoidance limit.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Y	0.45	0.45
PM <sub>10</sub>	Y	0.45	0.45
SO <sub>2</sub>	Y	0.19	0.19
VOC	Y	56.09	56.09
NO <sub>x</sub>	Y	14.35	14.35
CO	Y	2.42	2.42
TRS	N		
H <sub>2</sub> S	N		
Individual HAP	N		
Total HAPs	N		

C. PSD/NSR Applicability

The facility was not previously classified as a PSD major source and will not be after the modification. The modification will not push the facility wide emissions above the PSD threshold emission rate of 249 tons of VOC per year, therefore, PSD is not applicable.

**III. Facility Wide Requirements**

A. Emission and Operating Caps:

There are no new emission or operating caps.

B. Applicable Rules and Regulations

Rules and Regulations Assessment – None Applicable.

Emission and Operating Standards – None Applicable.

C. Compliance Status

The facility is in compliance at this time.

D. Operational Flexibility

Keebler has not indicated that there are any alternative operating scenarios for the new equipment to be installed.

E. Permit Conditions

None Applicable.

**Regulated Equipment Requirements**

**A. Brief Process Description**

The facility produces yeast leavened and non-yeast leavened food products. The product is baked in ovens fired with natural gas and propane as a back-up fuel.

**B. Equipment List for the Process**

Emission Units			Specific Limitations/Requirements			Air Pollution Control Devices
Emission Groups	ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
OV	OV1	Cookie and Cracker Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.1, 3.4.2, 3.4.3	N/A	N/A
	OV2	Cookie and Cracker Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.1, 3.4.2, 3.4.3	N/A	N/A
	OV3	Cookie and Cracker Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.1, 3.4.2, 3.4.3	N/A	N/A
	OV4	Cookie and Cracker Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.1, 3.4.2, 3.4.3	N/A	N/A
SL	SL01	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF01	Fabric Filter
	SL02	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF02	Fabric Filter
	SL03	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF03	Fabric Filter
	SL04	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF04	Fabric Filter
	SL05	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF05	Fabric Filter
	SL06	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF06	Fabric Filter
	SL07	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF07	Fabric Filter
	SL08	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF08	Fabric Filter
	SL09	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF09	Fabric Filter
	SL10	Raw Materials Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	FF10	Fabric Filter

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

C. Equipment & Rule Applicability

**Emission and Operating Caps –**

None Applicable.

**Applicable Rules and Regulations –**

Rules and Regulations Assessment:

Georgia State Rule 391-3-1-.02(2)(b) is applicable as long as the source is subject to a more stringent state or federal rule limiting emissions.

Georgia State Rule 391-3-1-.02(2)(e) has no trigger value to indicate applicability, it is applicable to any emission unit that emits particulate matter from the manufacturing of some product.

Georgia State Rule 391-3-1-.02(2)(g) has no trigger value to indicate applicability, it is applicable to any fuel burning equipment.

Emission and Operating Standards:

Georgia State Rule 391-3-1-.02(2)(b) limits the visible emissions from the facility to forty (40) percent opacity.

Georgia State Rule 391-3-1-.02(2)(e) limits the emission of particulate matter from the baking ovens and storage silos to the amount derived from the equation  $E = 4.1 * P^{0.67}$ , where E is the emission rate in pounds per hour and P is the process input weight rate in tons per hour.

Georgia State Rule 391-3-1-.02(2)(g) limits the sulfur content of the fuel burned in the process ovens to 2.5 percent.

D. Compliance Status

The facility is in compliance at this time.

E. Operational Flexibility

Keebler has not indicated any alternative operating scenarios for the new oven to be installed.

F. Permit Conditions

Condition Nos. 3.4.1 and 3.4.2 were changed to reflect the grouping of the emission units listed in Table 3.1 into emission groups.

**IV. Testing Requirements (with Associated Record Keeping and Reporting)**

A. Individual Equipment:

None Applicable.

B. Equipment Groups:

None Applicable.

**V. Monitoring Requirements (with Associated Record Keeping and Reporting)**

A. Individual Equipment:

None Applicable.

B. Equipment Groups:

Condition No. 5.2.2 was changed to reflect the grouping of the storage silos into an emission group. This condition requires visible emission checks every fill cycle and monthly inspections on the silo baghouses as periodic monitoring for Rules (b) and (e).

The four cookie and cracker ovens in Emission Group OV are subject to Rules (b), (e), and (g), which limit visible emissions, particulate matter emissions and sulfur compound emissions, respectively. Because of the relatively low heat input capacities of these ovens and because they burn only natural gas with LPG as a backup fuel, no violation of Rules (b), (e), and (g) is likely to occur. Therefore, no additional monitoring is specified for the ovens to demonstrate compliance with these standards.

**VII. Other Record Keeping and Reporting Requirements**

Condition No. 6.2.2 was changed to reflect the grouping of the baking ovens, including the new oven, into an emission group. This condition is used to calculate VOC emissions from the ovens.

**VIII. Specific Requirements**

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

None Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

None Applicable.

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

The facility is in compliance at this time.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Prevention of Accidental Releases

Not Applicable.

J. Stratospheric Ozone Protection Requirements

Not Applicable.

K. Pollution Prevention

Not Applicable.

**Addendum to Narrative**

No comments received during the public comment period.