

Facility Name: **General Mills Operations, Inc. – Covington, GA**

City: Covington

County: Newton

AIRS #: 04-13-217-00033

Application #: 14819 & 15209

Date SIP Application Received: November 3, 2003 & March 29, 2004

Date Title V Application Received: November 3, 2003 & March 29, 2004

Permit No: 2043-217-0033-V-01-2

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TOXICS		

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **General Mills Operations, Inc. – Covington, GA** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, 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 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****Table 1: Current Title V Permit and Amendments**

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2043-217-0033-V-01-0	June 19, 2002	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2043-217-0033-V-01-0	Initial Title V Permit

B. Regulatory Status

This facility is not considered a PSD major source. The potential emission of each regulated pollutant emitted is less than 250 tons per year. The facility is not one on the 28 listed categories. However, the facility is an NSR major source. On June 15, 2004, Newton County became a non-attainment area for the 8-hour ozone standard. Facilities located in Newton County having potential nitrogen oxide (NO_x) and/or volatile organic compound (VOC) emissions over 100 tons per year became NSR major sources on June 15, 2004. This facility has potential NO_x emissions over 100 tons per year, which makes the facility an NSR major source. NSR review is not required provided the net NO_x emission increase is less than 40 tons per year and net VOC emission increases is less than 40 tons per year when examining all contemporaneous increases and decreases since June 15, 2004. The analysis must consider past actual vs. future potentials.

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	Yes	Yes		
PM ₁₀	Yes	Yes		
SO ₂	Yes	Yes		
VOC	Yes			Yes
NO _x	Yes	Yes		
CO	Yes			Yes
TRS	No	n/a		
H ₂ S	No	n/a		

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
Individual	Yes			Yes
Total HAPs	Yes			Yes

II. Proposed Modification

A. Description of Modification

Application TV-15209 requests the installation of 2 new production lines. One of the new production lines (identified as EG6) is located at the East Plant and one production line (identified as EG7) is located at the West Plant. Moreover, General Mills requests to replace an existing Boiler (X03) with a new 61 MMBTU/hr Boiler (X04) at the utility building.

Application TV-14819 requests changing existing scrubber monitoring to allow VE checks in place of water flow rate.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Facility Wide Potential Emissions (tpy)
PM	Yes	+83.91	227.50
PM ₁₀	Yes	+52.86	151.66
SO ₂	Yes	+78.95	214.90
VOC	Yes	+1.42	99.93
NO _x	Yes	+18.48	80.27
CO	Yes	+22.05	63.87
TRS	No		
H ₂ S	No		
Individual HAP	No		
Total	Yes	+1.44	4.69

C. Title I Modification

- PSD/NSR Applicability

This facility is a major NSR source. The modifications will not be subject to NSR because the net NO_x emission increase is less than 40 tons per year and net VOC emission increases is less than 40 tons per year when examining all contemporaneous increases and decreases since June 15, 2004. The analysis considers past actual vs. future potentials. The analysis is summarized as follows:

Net Emission Change = {equals}
 Emission increases associated with the proposed modification – {minus}
 Source-wide creditable contemporaneous emission decreases + {plus}
 Source-wide creditable contemporaneous emission increases

Emission increases associated with the proposed modification =

Pollutant	Boiler XO4 (tons/yr)	Lines EG6 & EG7 (tons/yr)	Total (tons/yr)
VOC	1.44	38 (new permit limit*)	39.44
NO _x	18.48	0 (steam heat only)	18.48

Source-wide creditable contemporaneous emission decreases =

Pollutant	Boiler XO3 Shutdown (tons/yr)	Total (tons/yr)
VOC	not quantified**	0**
NO _x	not quantified**	0**

NOTES:

*Condition 3.3.3 has been added to limit combined VOC emissions from the new production lines (ID No.s, E66 and E67) to 38 tons per year. Conditions 6.2.14, 6.2.15 and 6.2.16 have been added to require VOC records and reporting. Condition 6.1.7 has been modified to require reporting of a limit exceedance.

**Emissions from Boiler XO3 were not quantified at this time. While emissions from Boiler XO3 would provide creditable contemporaneous emission decreases, the decreases are not necessary since the potential emissions from all increases are already below 40 tons per year. Hence, an NSR is avoided for the proposed modifications.

Source-wide creditable contemporaneous emission increases = 0 tons/yr

Net VOC Emissions = 39.44 tons/yr - 0 tons/yr + 0 tons/yr = 39.44 tons/yr

Net NO_x Emissions = 18.48 tons/yr - 0 tons/yr + 0 tons/yr = 18.48 tons/yr

- NSPS Modification

The modification is a NSPS modification. The new boiler X04 is subject to the provisions of 40 CFR Part 60 Subpart A - "General Provisions" and Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units."

- NESHAP Modification

The change is not a modification under Part 61.

III. Facility Wide Requirements

A. Emission and Operating Caps

General Mills has a facility wide VOC emission cap of 100 tons per year. This limit keeps the facility from being subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(tt), *VOC Emissions from Major Sources*. Actual facility emissions are only about 50 tons per year currently; however, this figure may be revised downward in the future as General Mills has determined that more of the VOCs used are remaining in the product, rather than being emitted to the atmosphere.

B. Applicable Rules and Regulations

Rules and Regulations Assessment – General Mills is not subject to any facility wide air quality rules other than the general provisions in Part VIII of the permit and the general provisions contained in Rule 391-3-1-.02(2)(a).

C. Compliance Status

Consent order No. EPD-AQC-4500 was issued on Boiler X04 to resolve noncompliance associated scrubber monitoring. The requirements of the consent order are incorporated into this amendment.

D. Operational Flexibility

See Section VII.

E. Permit Conditions

None.

IV. Regulated Equipment Requirements

A. Brief Process Description

General Mills has grouped most of their sources as five separate processing lines. All of these lines have similar equipment for preprocessing, cooking, drying, cooling, toasting and/or coating and packaging. Separating them into five separate groups (EG1-EG5) however, allows the different control devices to be matched to the appropriate process line. All of these sources are primarily particulate matter sources, which are vented to one of many different baghouses or scrubbers. However, VOCs, which are evolved from the flavoring agents used, are emitted throughout the manufacturing process after being added as ingredients. These sources are all subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(e), “Particulate Matter Emissions from Manufacturing Processes.” However, there are no applicable VOC rules or regulations.

The other emission group included in the permit is the boilers group (EGX), which currently includes three 30 million BTU per hour boilers which burn natural gas with no. 2 oil as a backup fuel. These

boilers are all original to the plant, and were installed in 1988 and are subject to the standards of Rule 391-3-1-.02 (2)(d). Although at one time capable of burning residual fuel oil this is no longer the case.

B. Equipment List for the Process

3.1.1 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EG6	Production Line 6 (East)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.3, 3.4.6, 3.4.9, 5.2.8, 5.2.9, 5.2.10, 6.1.7, 6.2.14, 6.2.15, 6.2.16	CD11 CD12 CD13	Baghouses
EG7	Production Line 7 (West)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.3, 3.4.6, 3.4.9, 5.2.8, 5.2.9, 5.2.10, 6.1.7, 6.2.14, 6.2.15, 6.2.16	C1D5 C2D5 C3D5	Baghouses
X04	Boiler	40 CFR Part 60, Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III)	3.3.1, 3.4.7, 3.4.8, 3.4.10, 4.2.1, 4.2.2, 5.2.5, 5.2.6, 5.2.7, 6.1.8, 6.2.9, 6.2.10, 6.2.13	N/a	None

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

C. Equipment & Rule Applicability

• Applicable Rules and Regulations –

Boiler X04 is subject to 40 CFR Part 60, Subpart Dc for boilers greater than 10 MMBTUs/hr and less than 100 MMBTUs/hr. Boiler X04 has a heating value of 61 MMBTUs/hr and burns natural gas as the primary fuel and No. 2 fuel oil as its secondary fuel. 60.43c(c) requires Dc boilers that combust oil and has a heat input capacity of 30 million BTU/hr or greater to limit visible emissions to 20% opacity except for one 6 minute period per hour of not more 27% opacity. See conditions 3.3.1 and 3.4.8.

Georgia Rule 391-3-1-.02(2)(b) “Visible Emissions” applies to all sources that are subject to at least one other emission limitation and are not subject to any other, more stringent, opacity standard. Georgia Rule 391-3-1-.02(2)(b) limits visible emissions to 40 percent opacity. This Rule, therefore, covers all of the sources subject to Georgia Rule 391-3-1-.02(2)(e), but not the boilers as they have an opacity limit from Georgia Rule 391-3-1-.02(2)(d).

Georgia Rule 391-3-1-.02(2)(d), parts 2 and 3 apply to the boilers located at this facility. Part 1 does not apply since this facility was built after 1972. Parts 2 and 3 apply since this facility was constructed after January 1, 1972. Georgia Rule 391-3-1-.02(2)(d)2.(ii) limits particulate matter emissions from the boiler at this facility according to the following equation:

$$E = 0.5(10/R)^{0.5} \text{ where } E \text{ equals the allowable particulate emission rate in pounds per million Btu heat input and } R \text{ equals the heat input in million Btu per hour.}$$

This equation applies to boilers whose heat input is between 10 and 250 million BTUs per hour. See Condition 3.4.7. Part 3 of this rule limits opacity emissions to 20 percent except for one six minute period per hour of not more than 27 percent opacity. See Condition 3.4.8. Part 4 of Georgia Rule

391-3-1-.02(2)(d) does not apply since the boiler at this facility has a heat input of less than 250 million BTUs per hour.

Georgia Rule 391-3-1-.02(2)(e) “Particulate Emission from Manufacturing Processes” applies to all processes that emit particulate matter and are not covered by a more specific rule or regulation. At General Mills, this includes all five of the process lines, but not the boilers. Emissions are limited by the equation:

$$E = 4.1 P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour.}$$
$$E = 55 P^{0.11} - 40; \text{ for process input weight rate above 30 tons per hour.}$$

where E equals the allowable particulate matter emission rate in pounds per hour, and P equals the process input rate in tons per hour.

This equation is contained in Condition 3.4.9 of the permit.

Georgia Rule 391-3-1-.02(2)(g) “Sulfur Dioxide” applies to all fuel burning sources capable of burning fossil fuel. However, part 1 of the Rule is inapplicable since there is no fuel burning sources at this facility with heat inputs of greater than 250 million BTUS per hour. Part 2 of this Rule limits fuel oil sulfur content to being less than 2.5 percent sulfur. Periodic monitoring requires oil burned in the furnaces and boiler at General Mills to meet ASTM 396 specifications, which limits sulfur content to 0.5 percent for No. 2 oil. Hence, compliance is assured.

Boiler X04 is subject to Georgia Rule 391-3-1-.02(2)(III)5 and will not discharge, or cause the discharge into the atmosphere from Boiler (X04), any gases which contain nitrogen oxides (NO_x) in excess of 30 parts per million (ppm) corrected to 3 percent oxygen on a dry basis. This requirement shall apply from May 1 through September 30 of each year. See condition 3.4.10.

D. Compliance Status

Consent order No. EPD-AQC-4500 was issued on Boiler X04 to resolve noncompliance associated with Production Line 6 (E66) and Production Line 7 (E67). The requirements of the consent order are incorporated into this amendment.

E. Operational Flexibility

None.

F. Permit Conditions

Condition 3.4.6 limits the opacity from all of the sources listed in table 3.1.1 of the permit according to Georgia Rule 391-3-1-.02(2)(b)1. Although General Mills has always been subject to this standard, it had not been included as a condition in earlier permits. The effected equipment is expected to meet this limit with the use of the baghouses and scrubbers at the plant. The boilers are not subject to this rule since they are instead subject to the stricter opacity standard of Georgia Rule 391-3-1-.02(d), which is in Condition 3.4.3.

Condition 3.4.7 limits the particulate matter emissions from the boiler according to Georgia Rule 391-3-1-.02(2)(d)2(ii). General Mills has also always been subject to this rule, although it has not been included in the permits. The boilers are expected to meet this emission limit without use of any controls.

Condition 3.4.8 limits opacity from the boilers to 20 percent, except for one six minute period per hour of not more than 27 percent, based on Georgia Rule 391-3-1-.02(2)(d)3 and the 40 CFR 60 Subpart Dc. General Mills has also always been subject to this rule, although it has not been included in any of their previous permits. The boilers would be expected to meet this emission limitation without the use of any controls.

Condition 3.4.9 limits the particulate matter emissions from all sources other than the boilers according to Georgia Rule 391-3-1-.02(2)(e)1(i). Since baghouses are used for the control of all of these particulate matter sources, they are expected to easily comply.

Condition 3.4.10 requires General Mills to comply with Georgia Rule 391-3-1-.02(2)(III). General Mills will not discharge, or cause the discharge into the atmosphere from Boiler X04, any gases which contain nitrogen oxides (NOx) in excess of 30 parts per million (ppm) corrected to 3 percent oxygen on a dry basis. This requirement shall apply from May 1 through September 30 of each year.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Within 60 days after startup of Boiler X04, General Mills will conduct performance tests for nitrogen oxides emissions from Boiler X04. The procedures contained in Section 2.120.2(b)(1) of the Division's *Procedures for Testing and Monitoring Sources of Air Pollutants* shall be used for the selection of sample points when determining compliance. Unless otherwise specified, the performance test will consist of 3 one-hour test runs.

Within 60 days after initially firing fuel oil in Boiler X04, General Mills will conduct a visible emissions performance test on Boiler X04 at the maximum expected firing rate. The results of the performance test(s) shall be submitted to the Division within 30 days of the completion of testing.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

The specific monitoring requirements included in Section 5.2 of the permit deal with the baghouses which are used to control emissions from all of the particulate matter sources at this facility subject to Georgia Rules for Air Quality Control 391-3-1-.02(2)(b) and (e). Baghouses as one of the most efficient control devices for particulate matter is expected to allow the source to easily comply with Rules (b) and (e) if kept in good operating condition. Condition 5.2.8 requires that General Mills measure the pressure differential across each baghouse, for each week it is operated. By recording these readings and comparing them to the established norms, required be determined by Condition 5.2.10, problems with the baghouses can be both detected early and prevented. Condition 5.2.9 requires that the baghouses be checked on a daily basis for visible emissions. Several of the baghouses at this facility vent inside the building. Emissions from these sources, if visible, would quickly be detected and corrected because of strict sanitary requirement, so daily checks weren't required. Finally, Condition 5.2.10, requires that a Preventive Maintenance Program be developed and implemented within 60 days of the issuance of the permit. This plan is to include the normal pressure drop ranges for the various baghouses, as well as

records of weekly checks of the baghouses and conveying systems for blockages and the bag cleaning mechanisms to ensure proper operation.

Monitoring of the boiler for compliance with Georgia Rule 391-3-1-.02(2)(d) and 40 CFR Subpart Dc is not considered necessary. Uncontrolled emissions are expected to be inherently below allowable particulate matter and opacity emission rates, since the only fuels consumed in the boilers, natural gas and No. 2 fuel oil, are both clean burning.

Condition 5.2.5 requires General Mills verify that each shipment of fuel oil received for combustion in the Boiler X04 complies with the requirements of Condition 3.4.5. Verification shall consist of either of the following. Fuel oil receipts obtained from the fuel supplier certifying that the oil is distillate oil. Analysis of the fuel oil conducted by methods of sampling and analysis, which have been specified or approved by the Division.

Condition 5.2.6 requires General Mills install, calibrate, maintain and operate natural gas and distillate fuel oil consumption meters on each boiler subject to Subpart Dc including Boiler X04. As allowed by Subpart Dc, the Permittee may propose an alternative protocol for monitoring fuel usage.

For Condition 5.2.7, General Mills Operations, Inc. – Covington will monitor the emissions of nitrogen oxides (NO_x) from Boiler X04 once a month from May 1 to September 30. Measurements of nitrogen oxides and oxygen concentrations shall be conducted using the procedures ASTM D6522 *Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers*. Nitrogen oxides concentrations shall be corrected to 3 percent oxygen using equation,

$$C_{\text{adj}} = C_{\text{d}} * [18.9 / (20.9 - \%O_2)].$$

Where; C_{adj} = Nitrogen oxides concentration corrected to 3 percent oxygen, ppm.

C_{d} = Nitrogen oxides concentration measured, dry basis, ppm.

$\%O_2$ = Measured oxygen concentration, dry basis, percent.

For the purposes of this condition, the gas meter used to measure the quantity of gas supplied to the unit shall be calibrated at least annually using any of the procedures contained in 40 CFR 75, Appendix D, §2.1.5.1.

VII. Other Record Keeping and Reporting Requirements

Fuel oil burned (as backup fuel) in the boilers is limited to No. 2 with a maximum sulfur content of 0.5 percent. Fuel supplier certifications that the fuel oil meets the specifications for Number 2 fuel oil as defined in ASTM 396 (*Standard Specifications for Fuel Oils*) are required for determining compliance with the fuel sulfur limit. Since the Rule (g) sulfur limit is 2.5 percent, the boilers will be well within compliance with the rule.

Monthly processing and usage records are required for all materials containing volatile organic compounds. General Mills must calculate a rolling 12 month total of emissions and notify the Division if any monthly total exceeds one twelfth of the annual limit. Actual emissions are anticipated to be less than one half of the permitted limit.

General Mills will report any two consecutive daily determinations of visible emissions from baghouses CD11, CD12, CD13, C1D5, C2D5, and C3D5 the same source for which visible emissions are present.

General Mills will make a daily determination that the water supply line flow rate for a scrubber controls emissions from a source listed in Table 3.1 of the Permit, and from sources added or replaced in accordance with the provisions of Condition 7.1.2 of the Permit, is less than 2 gallons per minute or an alternative supply line flow determined by provisions of Consent Order No EPD-AQC-4500.

Condition 6.2.10 requires General Mills will furnish the Division a written notification of the date that operations of Boiler X03 permanently ceased within 15 days after such date.

Condition 6.2.11 requires General Mills record the water supply line flow rates to the scrubbers during the tests required by Consent Order No EPD-AQC-4500 and shall use the data to establish a minimum flow rate that represents proper operation of the scrubbers. The Permittee shall submit with the test results a report containing the water supply line flow rates that have been established as representative of proper scrubber operation and a description of the procedures used to establish the representative water supply line flow rate.

VIII. Specific Requirements

A. Operational Flexibility

None.

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V permit.

C. Insignificant Activities

Insignificant activities are listed in Attachment B of the permit and in section 4.10 and section 4.50 of the Title V permit application.

D. Temporary Sources

General Mills did not request the permitting of any temporary sources.

E. Short-Term Activities

Short term activities are listed in section 4.40 of the application and include fumigation and insecticide applications.

F. Compliance Schedule/Progress Reports

Consent order No. EPD-AQC-4500 was issued on Boiler X04 to resolve noncompliance associated with Production Line 6 (E66) and Production Line 7 (E67). The requirements of the consent order are incorporated into this amendment.

G. Emissions Trading

This facility is not involved in any emissions trading programs.

H. Acid Rain Requirements

This facility is not subject to any requirements of Title IV of the Clean Air Act Amendments (acid rain).

I. Prevention of Accidental Releases

This facility has not indicated that they have any substances, which are stored in quantities above the threshold for the Accidental Release Prevention Program.

J. Stratospheric Ozone Protection Requirements

The facility has indicated that they are subject to Title VI, Subpart F of 40 CFR, Part 82 and that either air conditioners or refrigeration equipment which use CFCs, HFCs or other stratospheric ozone-depleting substances and in a charge of greater than 50 pounds.

K. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V Permit.

L. Specific Conditions

None

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The 30-day public review started on February 11, 2005 and ended on March 11, 2005. The Division received comments from General Mills on March 4, 2005.

Comment: 1

General Mills requests EPD *remove* the following permit conditions, which pertain to monitoring the scrubbers.

Condition 6.1.7(c)

- i. *Any daily determination that the water supply line flow rate for a scrubber that controls emissions from a source listed in Table 3.1 of this permit, and from sources added or replaced in accordance with the provisions of Condition 7.1.2, is less than 2 gallons per minute or an alternative supply line flow rate determined by the provisions of Consent Order No. EPD-AQC-4500.*

Condition 6.2.12

After test results showing compliance with all applicable particulate matter limits have been submitted to the Division in accordance with Consent Order No. EPD-AQC-4500, the Permittee shall use the following definition of excursions for the scrubbers in lieu of that in Condition 6.1.7: Any daily determination that the water supply line flow rate for a scrubber that controls emissions from a source listed in Table 3.1 of the Permit, and from sources added or replaced in accordance with the provisions of Condition 7.1.2 of the Permit, is less than the water supply line flow rate determined by the provisions of Condition 6.2.11.

Divisions Response:

General Mills conducted a source test on December 15, 2004 and PM emissions from the source test were estimated to be 0.526 lb/hr. During the test, the water was turned off on the scrubber. Based on Georgia Rule 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes", allowable PM emissions are calculated to be 10.31 lb/hr. Therefore, since uncontrolled PM emissions are only 5.1% of allowable, the Division agrees with the removal of Conditions 6.1.7(c) and 6.2.12.

Comment: 2

General Mills requested more stringent fuel burning requirements in 2001. In particular, General Mills agreed to discontinue firing of residual oil and fire propane, natural gas, and No. 2 oil only. This was incorporated as Condition 3.4.5 of the permit. General Mills requests EPD *remove* the following permit conditions, which pertain to major NSR sources.

Condition 3.3.3

The Permittee shall not discharge or cause the discharge into the atmosphere from Production Line 6 (E66) and Production Line 7 (E67) combined volatile organic compound emissions in excess of 38 tons/yr during any twelve consecutive months. (NSR Avoidance]

Condition 6.1.7(b)

- iii. *Any 12 consecutive month VOC total combined emissions from Production Line 6 (E66) and Production Line 7 (E67) is greater than 38 tons.*

Condition 6.2.14

The Permittee shall use the records required by Condition 6.2.2 to determine the monthly mass emission rate, in tons per month, of VOC from Production Line 6 (E66) and Production Line 7 (E67). These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.

Condition 6.2.15

The Permittee shall use the records required by Condition 6.2.14 to determine the twelve consecutive month total VOC emissions (in tons) from Production Line 6 (E66) and Production Line 7 (E67) for each month. A twelve consecutive month total shall be the total for a month in the reporting period plus the totals for the previous 11 consecutive months. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.

Condition 6.2.16

The Permittee shall notify the Division in writing if the VOC emissions calculated in Condition 6.2. 14 exceed 3.16 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limitation in Condition 3.3.3.

Divisions Response:

The facility was permitted in 1989 as a new source under Georgia Air Quality Permit Nos. 2043-107-10225 and 2043-107-10993, which regulated the process and boiler emissions. Permit 10993 contained a facility-wide Volatile Organic Compound (VOC) emission limit of 100 tons per year (tpy), taken proactively to avoid future application of Georgia's VOC Reasonably Available Control Technology (RACT) rules. This limit was transferred to the facility's initial Title V permit, issued June 19, 2002.

Under Permit 10225, the boilers were allowed to burn No. 6 fuel oil, which resulted in potential nitrogen oxides (NO_x) emissions greater than 100 tpy. In 2001, General Mills asked for a more stringent condition to burn distillate oil. EPD placed this restriction in the facility's initial Title V permit (June 19, 2002). The new limit enabled General Mills to maintain a non-major source status as defined by Prevention of Significant Deterioration (PSD) with respect to nitrogen oxide (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO), and particulate matter (PM) emissions.

When Newton County became an ozone non-attainment area in June 2004, the major source threshold for new source review (NSR) was set at 100 tpy for NO_x and VOC. Major sources in Newton County are subject to NSR permitting requirements for any construction or modification. Conditions 3.4.5 and 3.4.10 limits the type of fuel that can be fired in the boilers, and limits potential NO_x emissions to 80.3 tpy based on AP-42 emission factors. Condition 2.1.1 limits VOC emissions to 100 tpy. As such, the facility is not considered major as defined by NSR.

Therefore, Conditions 3.3.3, 6.1.7(b), 6.2.14, 6.2.15, and 6.2.16 are deleted, and Conditions 3.4.5 and 2.1.1 are updated with proper citation of regulatory authority.

Special Additional Actions:

Due to the comments by General Mills received on March 4, 2005 and subsequent changes made, Air Quality Permit No.: 2043-217-0033-V-01-1 has been revoked and replaced by Air Quality Permit No.: 2043-217-0033-V-01-2.