



**Facility Identification Data**

Name: GENERAL MILLS OPERATIONS LLC  
Address: 54 S MICHIGAN AVE  
BUFFALO, NY 14203

**Owner/Firm**

Name: GENERAL MILLS OPERATIONS LLC  
Address: 1 GENERAL MILLS BLVD  
MINNEAPOLIS, MN 55426-1347, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
Name: DAVID S DENK  
Address: 270 MICHIGAN AVE  
BUFFALO, NY 14203-2999  
Phone:7168517165

Division of Air Resources:  
Name: MARCIA E LADIANA  
Address: NYSDEC  
270 MICHIGAN AVE  
BUFFALO, NY 14203-2915  
Phone:7168517130

Air Permitting Contact:  
Name: PAUL GISTER  
Address: GENERAL MILLS  
54 S MICHIGAN AVE  
BUFFALO, NY 14203  
Phone:7168573704

**Permit Description**

**Introduction**

The Title V operating air 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 for this permit review report 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 permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

This application was submitted for the renewal of the title V permit for the Flour Mill. This title V permit renewal contains no significant changes in plant operations, with the exception of the addition of 40CFR64 Compliance Assurance Monitoring requirements for nine emission sources and the addition of a facility CAP on hazardous air pollutants to avoid requirements of 40CFR63. In addition, EP 00033 was renamed EP 00070.

**Attainment Status**



GENERAL MILLS OPERATIONS LLC is located in the town of BUFFALO in the county of ERIE. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

| Criteria Pollutant                               | Attainment Status       |
|--|-------------------------|
| Particulate Matter (PM)                          | ATTAINMENT              |
| Particulate Matter < 10 $\mu$ in diameter (PM10) | ATTAINMENT              |
| Sulfur Dioxide (SO <sub>2</sub> )                | ATTAINMENT              |
| Ozone*   | MARGINAL NON-ATTAINMENT |
| Oxides of Nitrogen (NO <sub>x</sub> )**          | ATTAINMENT              |
| Carbon Monoxide (CO)                             | ATTAINMENT              |

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NO<sub>x</sub>) which are ozone precursors.

\*\* NO<sub>x</sub> has a separate ambient air quality standard in addition to being an ozone precursor

## Facility Description

General Mills Operations, Inc. (General Mills) owns and operates a flour processing plant, a cereal processing plant and a cogeneration/boiler house plant located at 54 South Michigan Avenue in Buffalo, New York. Although these three plants are located on adjacent properties, are under common control, and are considered to be one title V facility, they operate somewhat independent of each other. At their request, General Mills was issued three separate Title V permits, one for each plant. This permit is specifically for the Flour Mill Plant which consists of two emission units, U-0000G (39 processes) and U-OPEST (1 process). In EU U-0000G grain is received, stored and processed into product which is either used directly by General Mills' adjacent Cereal Facility or sold as flour. The emissions at the flour processing plant are particulates (PM) and particulates with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM-10). Haps, predominantly methyl bromide, are also emitted from EU U-OPEST, which consists of pesticide fogging operations at the flour and grain mills.

## Permit Structure and Description of Operations

The Title V permit for GENERAL MILLS OPERATIONS LLC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus,



contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion - devices which burn fuel to generate heat, steam or power  
incinerator - devices which burn waste material for disposal  
control - emission control devices  
process - any device or contrivance which may emit air contaminants  
that is not included in the above categories.

GENERAL MILLS OPERATIONS LLC is defined by the following emission unit(s):

Emission unit U0000G - This emission unit consists of multiple emission points in which grain is handled or processed into product that is either used directly by the Cereal Processing Plant or sold as flour or animal feed. Product recovery systems are used and add product back into the system. Exhaust from these systems emit particulates (PM) and particulates with a diameter of 10 micrometers or less (PM-10) into the atmosphere. Emission unit U0000G consists of the following emission points: 0001G, 0002G, 0003G, 0004G, 0005G, 0006G, 0007G, 0008G, 0009G, 0010G, 0011G, 0012G, 0013G, 0014G, 0015G, 0017G, 0042G, 0046G, 0048G, 0049G, 0051G, 0052G, 0053G, 0054G, 0055G, 0056G, 0058G, 0059G, 0060G, 0061G, 0062G, 0063G, 0064G, 0066G, 0067G, 0068G, 0069G and 00070G.

Emission unit U0000G is associated with the following emission points (EP):

0001G, 0002G, 0003G, 0004G, 0005G, 0006G, 0007G, 0008G, 0009G, 0010G, 0011G, 0012G, 0013G, 0014G, 0015G, 0017G, 0042G, 0046G, 0048G, 0049G, 0051G, 0052G, 0053G, 0054G, 0055G, 0056G, 0058G, 0059G, 0060G, 0061G, 0062G, 0063G, 0064G, 0066G, 0067G, 0068G, 0069G, 0070G

It is further defined by the following process(es):

Process: G01 is located at 1, Building 63 - Wheat flour is conveyed via suction from the C-1 Mill and the dust is transported to the collector. The dust is returned to the system and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G02 is located at 1, Building 63 - Wheat flour is conveyed via suction from the C-1 Mill and the dust is transported to the collector. The dust is returned to the system and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G03 is located at 1, Building 63 - Wheat flour processing is drawn through the C-1A filter system, where the particulates are returned to the system and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G04 is located at 4, Building 63 - Wheat flour is drawn through the C-18 Mill filter. The particulates are returned to the system and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G05 is located at 4, Building 63 - Wheat flour processing is drawn through the C-1 Flour Mill filter and the particulates are returned to the process. The air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G06 is located at 4, Building 63 - Wheat flour processing and cyclone discharge is drawn through the C-2 general suction filter system. The particulates are returned to the system and the air is exhausted into the atmosphere. The filter is part of the process.

Process: G07 is located at 1, Building 63 - Wheat flour processing and cyclone discharge is drawn through the C-2 Pre-Break filter system. The particulates are returned to the process and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G08 is located at 4, Building 63 - Wheat processing dust is drawn through the C-2A Mill filter collector. The particulates are returned to the system and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G09 is located at 4, Building 63 - Wheat flour processing dust is drawn through the C-2B Mill filter



system. The particulates are returned to the system and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G10 is located at 4, Building 63 - Wheat flour is drawn through the C-2 flour system. The particulates are returned to the system and the air is exhausted into the atmosphere. The filter is part of the process.

Process: G11 is located at 1, Building 63 - Wheat flour processing dust is drawn through the C-3C-4 general suction filter. The dust is returned to the process and the air is exhausted into the atmosphere. The filter is part of the process.

Process: G12 is located at 1, Building 63 - Wheat flour processing dust is drawn through the C-3C-4 Pre-Break filter. The dust is returned to the process and the air is exhausted into the atmosphere. The filter is part of the process.

Process: G13 is located at 4, Building 63 - Wheat flour processing dust is drawn through the C-3 Mill filter. The dust is returned to the system and the air is exhausted into the atmosphere. The filter is part of the process.

Process: G14 is located at 4, Building 63 - Wheat flour processing dust is drawn through the C-4 Mill filter. The dust is returned to the process and the air is exhausted into the atmosphere. The filter is part of the process.

Process: G15 is located at 4, Building 63 - Wheat dust is drawn into the filter. The dust is returned to the process and the air is exhausted into the atmosphere. The filter is part of the process.

Process: G17 is located at 7, Building 2 - This system consists of vacuum collection of sweepings (wheat and flour dust). The dust is collected for disposal and the air is exhausted into the atmosphere through the emission point.

Process: G42 is located at 1 & 2, Building 24 - Flour is picked up by suction and conveyed to the central collector. The dust is disposed and the air is exhausted into the atmosphere through the emission point.

Process: G46 is located at 3, Building 63 - Flour dust is picked up by suction and transported to the central collector for disposal. The air is then exhausted into the atmosphere through the emission point.

Process: G48 is located at 1, Building 12 - Wheat dust is drawn into filter to be returned to process. The air is then exhausted into the atmosphere through the emission point.

Process: G49 is located at 4, Building 63 - Dust is drawn into filter to be returned back into the process. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G51 is located at 7, Building 2 - Raw wheat aspiration filter system B. Dust is drawn into the filter and returned to the process. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G52 is located at 4, Building 2 - Dust from the raw wheat aspiration system is drawn into the system C filter. The dust is returned to the process and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G53 is located at 8, Building 4 - Dust from the hammer mill aspiration system is drawn into the filter and is returned back to the process. The air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G54 is located at 4, Building 2 - Dust from the heavy bran processing system is drawn into the filter and returned to the process. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G55 is located at 10, Building 9 - Dust from the clean flour aspirator is drawn into the filter and returned to the process. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G56 is located at 4, Building 27 - Dust from the process is drawn into the filter and returned back to the process. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G58 is located at 2, Building 72 - Wheat, flour and dust sweepings are transported to the Hoffman system and disposed of. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G59 is located at 2, Building 72 - Flour dust and air is picked up at various points on the packers (1 and 2) and conveyed to a fabric filter. The dust is recycled into the process and the air is exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G60 is located at Building 9 - Wheat dust and air is picked up at various points during the grain handling process. This is then conveyed to a fabric filter and the dust is returned to the process. The air is then exhausted into the atmosphere through the emission point.

Process: G61 is located at Ship Unloading, Building Outside 9 - During the grain unloading process, wheat dust and



air are picked up by the dust collector at various points along the ship's enclosed conveyor. This is sent to a fabric filter, where the dust is returned to the process and the air is exhausted into the atmosphere through the emission point.

Process: G62 is located at Building 9 - Wheat, dust and air are picked up at various points during the grain handling process and conveyed to a fabric filter. The dust is returned to the process and the air is exhausted into the atmosphere through the emission point.

Process: G63 is located at Building 9 - Wheat, dust and air are picked up at various points in the grain handling process and conveyed to a fabric filter. The dust is returned to the process and the air is exhausted into the atmosphere through the emission point.

Process: G64 is located at Building 9 - Wheat, dust and air are picked up at various points in the grain handling process and conveyed to a fabric filter. The dust is returned to the process and the air is exhausted into the atmosphere through the emission point.

Process: G66 is located at 10, Building 9 - Grain dust from multiple points is drawn into the filter and returned to the process. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: G67 is located at 1, Building 20 - Grain dust is drawn into the filter and returned to the process. The air is then exhausted into the atmosphere through the emission point.

Process: G68 is located at Building 27 - Finished product (flour) is pneumatically conveyed to a storage bin, prior to being deposited into bulk containers. The air entering the storage bin is then released to the Kice Dust Collector for cleaning prior to discharging to the ambient atmosphere.

Process: G69 is located at Ship Unloading, Building Outside 9 - Wheat, dust and air are picked up by the dust collector at various points during the grain handling process at the ship unloading station. This is then conveyed to the filter where the dust is returned to the process. The air is exhausted into the atmosphere through the emission point.

Process: G70 is located at Frontier Elevator, Building 9 - Grain dust is drawn through the collector from grain storage bin top area/grain tower head. The dust is disposed and the air is exhausted into the atmosphere.

(This is old Process G33 rerouted to EP 0065G and ESC GC65G. Process G65 was shut down due to a change in the ship unloading process and EP 0033G and ES GP33G / ESC GC33G were shutdown due to deterioration of control equipment.)

Process: HLD This process is everything that is not subject to 40CFR60, Subpart DD related to fugitive particulate emissions from a ship that is unloading grain.

Emission unit UOPEST - This emission unit consists of short term, portable sources of pesticide emissions generated during the fumigation of grains and flour products at the Flour Plant. The pesticide used and method of application may vary based on specific requirements set by New York State, USEPA, USFDA and other Federal, State and local agencies. Currently, General Mills uses methyl bromide as a general pest fumigant, but has used methyl chloride in the recent past. Both are presently classified as hazardous air pollutants (HAPs) and as volatile organic compounds (VOCs). Methyl Bromide is also listed as a potential ozone depleting substance.

It is further defined by the following process(es):

Process: PST This process is the fumigation of grains and flour products at the Flour Plant using various pesticides and application methods.

#### **Title V/Major Source Status**

GENERAL MILLS OPERATIONS LLC is subject to Title V requirements. This determination is based on the following information:

General Mills' facility-wide potential to emit (PTE) SO<sub>2</sub> and PM-10 exceeds the major source thresholds of 100 tons per year (tpy) each. General Mills chose not to cap their facility-wide PTE for each of these contaminants to less than the applicability thresholds. Therefore, General Mills is considered major for these contaminants and subject to the provisions of Title V. Since the facility has the potential to emit greater than 250 tpy of PM-10, it is also considered



a major stationary source for 40CFR52.21 - Prevention of deterioration of air quality (PSD). Emissions of NOx and SO2 from the Co-Gen/Boiler House Plant are capped at 91.5 tpy and 167.0 tpy, respectively to avoid the requirements of PSD (see Co-Gen/Boiler House Permit DEC ID No. 914020056500177). Under 6NYCRR201-7, facility-wide emissions of volatile organic compounds (VOCs) are capped below the 50 tpy major source threshold at 49 tpy to avoid the requirements of 6NYCRR212.10, VOC RACT (see Cereal Plant permit, DEC ID No. 914020056500179). Facility-wide emissions of NOx are capped below the 100 tpy major source threshold at 99 tpy to avoid the requirements of 6NYCRR227-2, NOx RACT (see Co-Gen/Boiler House Permit DEC ID No. 914020056500177). In addition, General Mill's PTE the HAP, methyl bromide, is greater than 10 tpy, which exceeds the major source threshold specified under 40CFR63 for applicable National Emission Standards for Hazardous Air Pollutants (NESHAPs). General Mills has limited their PTE methyl bromide (individual HAP) to less than 10 tpy and their PTE total HAPs to less than 25 tpy (see Flour Mill, Permit DEC ID No. 914020056500175). These federally enforceable CAPs allow General Mills to avoid the requirements of Subpart DDDDD - Industrial, Commercial and Institutional Boilers and Process Heaters and Subpart YYYYY- Combustion Turbines.

**Program Applicability**

The following chart summarizes the applicability of GENERAL MILLS OPERATIONS LLC with regards to the principal air pollution regulatory programs:

| Regulatory Program             | Applicability |
|--------------------------------|---------------|
| PSD                            | NO            |
| NSR (non-attainment)           | NO            |
| NESHAP (40 CFR Part 61)        | NO            |
| NESHAP (MACT - 40 CFR Part 63) | NO            |
| NSPS                           | YES           |
| TITLE IV                       | NO            |
| TITLE V                        | YES           |
| TITLE VI                       | NO            |
| RACT                           | NO            |
| SIP                            | YES           |

**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR** New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS)



for specified pollutants.

**NESHAP**      National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

**MACT**      Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

**NSPS**      New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

**Title IV**      Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

**Title VI**      Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

**RACT**      Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

**SIP**      State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

### **Compliance Status**

Facility is in compliance with all requirements

### **SIC Codes**

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is



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determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

| SIC Code | Description                   |
|----------|-------------------------------|
| 2041     | FLOUR & OTHER GRAIN MILL PROD |
| 2043     | CEREAL BREAKFAST FOODS        |

**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

| SCC Code    | Description  |
|-------------|--|
| 3-02-005-05 | FOOD AND AGRICULTURE<br>FOOD AND AGRICULTURE - FEED AND GRAIN TERMINAL<br>ELEVATORS                  |
| 3-02-007-30 | Unloading (Receiving)<br>FOOD AND AGRICULTURE<br>FOOD AND AGRICULTURE - GRAIN MILLINGS<br>GENERAL ** |
| 3-02-007-32 | FOOD AND AGRICULTURE<br>FOOD AND AGRICULTURE - GRAIN MILLINGS<br>PRECLEANING/HANDLING (WHEAT)        |
| 3-02-007-33 | FOOD AND AGRICULTURE<br>FOOD AND AGRICULTURE - GRAIN MILLINGS<br>CLEANING HOUSE (WHEAT)              |
| 3-02-007-34 | FOOD AND AGRICULTURE<br>FOOD AND AGRICULTURE - GRAIN MILLINGS<br>MILLHOUSE (WHEAT)                   |

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

| Cas No.     | Contaminant Name   | PTE     |       |
|-------------|--------------------|---------|-------|
|             |                    | lbs/yr  | Range |
| 000630-08-0 | CARBON MONOXIDE    | 88932   |       |
| 0NY100-00-0 | HAP                | 48000   |       |
| 000074-83-9 | METHYL BROMIDE     | 18000   |       |
| 000074-87-3 | METHYL CHLORIDE    | 18000   |       |
| 0NY210-00-0 | OXIDES OF NITROGEN | 198000  |       |
| 0NY075-00-0 | PARTICULATES       | 1886920 |       |
| 0NY075-00-5 | PM-10              | 1886920 |       |
| 007446-09-5 | SULFUR DIOXIDE     | 334000  |       |





ONY998-00-0 VOC

98000

### NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

**Item A: Emergency Defense - 6NYCRR Part 201-1.5**

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)**

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.



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**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

**Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)**

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to



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the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item L: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Regulatory Analysis**

| Location<br>Facility/EU/EP/Process/ES | Regulation             | Condition | Short Description   |
|---------------------------------------|------------------------|-----------|---|
| FACILITY                              |                        | 46        | Powers and Duties of the Department with respect to air pollution control |
| FACILITY                              | 40CFR 60-A             | 36        |   |
| FACILITY                              | 40CFR 60-A.4           | 37        | General provisions - Address  |
| FACILITY                              | 40CFR 60-DD.302(b) (1) | 38, 39    | Grain elevators -   |



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|          |                             |            |  |
|----------|-----------------------------|------------|--|
| FACILITY | 40CFR 60-DD.302 (b) (2)     | 40         | standard for particulate matter<br>Grain elevators -   |
| FACILITY | 40CFR 60-DD.302 (c) (2)     | 41         | standard for particulate matter<br>Grain elevators -   |
| FACILITY | 40CFR 60-DD.302 (d)         | 42         | standard for particulate matter<br>Grain elevators -   |
| FACILITY | 40CFR 63-DDDDD              | 28, 29     | standard for particulate matter<br>Boilers and Process Heaters NESHAP rule                                       |
| FACILITY | 40CFR 63-YYYY               | 28, 29     |  |
| FACILITY | 40CFR 64                    | 43         | COMPLIANCE ASSURANCE   |
| FACILITY | 40CFR 68                    | 20         | MONITORING   |
| FACILITY | 40CFR 82-F                  | 21         | Chemical accident prevention provisions<br>Protection of Stratospheric Ozone - recycling and emissions reduction |
| FACILITY | 6NYCRR 200.6                | 1          | Acceptable ambient air quality.  |
| FACILITY | 6NYCRR 200.7                | 9          |  |
| FACILITY | 6NYCRR 201-1.4              | 47         | Unavoidable noncompliance and violations   |
| FACILITY | 6NYCRR 201-1.7              | 10         |  |
| FACILITY | 6NYCRR 201-1.8              | 11         | Prohibition of reintroduction of collected contaminants to the air   |
| FACILITY | 6NYCRR 201-3.2 (a)          | 12         | Exempt Activities - Proof of eligibility   |
| FACILITY | 6NYCRR 201-3.2 (c) (6)      | 22         | Exempt Activities - emergency power generating units   |
| FACILITY | 6NYCRR 201-3.3 (a)          | 13         | Trivial Activities - proof of eligibility  |
| FACILITY | 6NYCRR 201-6                | 23, 44, 45 | Title V Permits and the Associated Permit Conditions   |
| FACILITY | 6NYCRR 201-6.5 (a) (4)      | 14         |  |
| FACILITY | 6NYCRR 201-6.5 (a) (7)      | 2          |  |
| FACILITY | 6NYCRR 201-6.5 (a) (8)      | 15         |  |
| FACILITY | 6NYCRR 201-6.5 (c)          | 3          | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring                                       |
| FACILITY | 6NYCRR 201-6.5 (c) (2)      | 4          | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring                                       |
| FACILITY | 6NYCRR 201-6.5 (c) (3) (ii) | 5          | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring                                       |
| FACILITY | 6NYCRR 201-6.5 (d) (5)      | 16         |  |
| FACILITY | 6NYCRR 201-6.5 (e)          | 24         |  |
| FACILITY | 6NYCRR 201-6.5 (f) (1)      | 25         | Alternate operating scenarios  |
| FACILITY | 6NYCRR 201-6.5 (f) (6)      | 17         |  |
| FACILITY | 6NYCRR 201-6.5 (g)          | 26         |  |
| FACILITY | 6NYCRR 201-7                | 27, 28, 29 | Federally Enforceable Emissions Caps   |
| FACILITY | 6NYCRR 202-1.1              | 18         |  |
| FACILITY | 6NYCRR 202-2.1              | 6          | Emission Statements - Applicability  |
| FACILITY | 6NYCRR 202-2.5              | 7          | Emission Statements - record keeping requirements.   |
| FACILITY | 6NYCRR 211.2                | 48         | General Prohibitions - air pollution prohibited.   |
| FACILITY | 6NYCRR 211.3                | 19         | General Prohibitions -   |



|          |                 |        |  |
|----------|-----------------|--------|--|
| FACILITY | 6NYCRR 212      | 30     | visible emissions limited  |
| FACILITY | 6NYCRR 212.3(b) | 31     | General Process Emission Sources   |
| FACILITY | 6NYCRR 212.4(c) | 32, 33 | General Process Emission Sources - emissions from existing emission sources          |
| FACILITY | 6NYCRR 212.6(a) | 34, 35 | General Process Emission Sources - emissions from new processes and/or modifications |
| FACILITY | 6NYCRR 215      | 8      | General Process Emission Sources - opacity of emissions limited                      |

**Applicability Discussion:**

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission



sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.



6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.



6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

In addition to Title V, GENERAL MILLS OPERATIONS LLC has been determined to be subject to the following regulations:

40CFR 60-A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

40CFR 60-A.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40CFR 60-DD.302 (b) (1)

This condition sets to particulate emission limit at 0.023 grams per dry standard cubic meter (or 0.01 grains per dry standard cubic foot).

40CFR 60-DD.302 (b) (2)





This condition requires that the opacity of emissions from a grain elevator, or other affected source subject to Subpart DD, not be greater than 0 percent.

40CFR 60-DD.302 (c) (2)

This condition requires that the opacity of fugitive emissions from the grain handling operations at a ship unloading station subject to Subpart DD, not be greater than 0 percent.

40CFR 60-DD.302 (d)

This condition sets forth the requirements for barge or ship unloading facilities. The unloading leg must be enclosed from the top to the bottom pulley and ventilated to a control device; the rate of air ventilated must be at least 32.1 actual cubic meters per cubic meter of grain handled; or the owner or operator may use other methods, approved by the Department, to control emissions of particulate matter.

40CFR 63-DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

40CFR 63-YYYY

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from stationary combustion turbines located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission and operating limitations.

40CFR 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

6NYCRR 201-3.2 (c) (6)

The following emergency power generating units are exempt from permitting requirements:

- (i) Facility specific emergency power generating units where each individual unit operates for no more than 500 hours per year.
- (ii) Centrally dispatched emergency power generating units where each individual unit operates for no more than 200 hours per year. Should a centrally dispatched emergency power generating unit be also operated as a facility specific emergency power generating unit, the annual 200 hour centrally dispatched operating time limit remains applicable, and the total combined hours for operating as either type of emergency power generating unit shall be for no more than 500 hours.

6NYCRR 201-6.5 (f) (1)

This regulation defines, in general terms, the operational flexibility provisions associated with alternate operating scenarios. Alternate operating scenarios refer to a range of operating conditions which are defined in the permit and which allow the source the flexibility to make specified changes without requiring a permit revision. These changes cannot violate any applicable requirement and must be tracked and recorded in a log at the source.



6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit the caps of 9.0 tons per year of a single hazardous air pollutant (HAP) and 24.0 tons per year of total HAPs from activities throughout the facility, including the Cereal Plant, Flour Plant and Co-Generation Plant were set to avoid the requirements of 40CFR63 Subpart YYYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines and 40CFR63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

6NYCRR 212

This condition requires that inspections, monitoring and preventative maintenance be carried out for each baghouse at the Flour Mill Plant to comply with either the particulate limit of 0.150 grains per dry standard cubic feet (gr/dscf) or 0.050 gr/dscf specified under 6NYCRR 212.3(b) and 6NYCRR212.4(c), respectively.

6NYCRR 212 .3 (b)

This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

| <b>Location<br/>Facility/EU/EP/Process/ES</b> | <b>Regulation</b> | <b>Short Description</b>                            |
|---|-------------------|---|
| FACILITY                                      | 40CFR 63-ZZZZ     | Reciprocating Internal<br>Combustion Engines NESHAP |

Reason: General Mills operates two reciprocating internal combustion engines (RICE) to generate electricity for emergency lighting. This unit consists of a 6 cylinder, 64 HP Hercules motor, Model No. DD-339. Since this an existing emergency stationary RICE with a site rating of less than 500 brake HP, General Mills does not have to meet the requirements of 40CFR63 Subparts A and ZZZZ.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**

Summary of monitoring activities at GENERAL MILLS OPERATIONS LLC:

| <b>Location<br/>Facility/EU/EP/Process/ES</b> | <b>Cond No.</b> | <b>Type of Monitoring</b> |
|---|-----------------|---------------------------|
|---|-----------------|---------------------------|



|          |    |   |
|----------|----|---|
| FACILITY | 38 | monitoring of process or control device parameters as surrogate |
| FACILITY | 39 | monitoring of process or control device parameters as surrogate |
| FACILITY | 40 | monitoring of process or control device parameters as surrogate |
| FACILITY | 41 | work practice involving specific operations                     |
| FACILITY | 42 | monitoring of process or control device parameters as surrogate |
| FACILITY | 43 | record keeping/maintenance procedures                           |
| FACILITY | 22 | work practice involving specific operations                     |
| FACILITY | 5  | record keeping/maintenance procedures                           |
| FACILITY | 24 | record keeping/maintenance procedures                           |
| FACILITY | 25 | record keeping/maintenance procedures                           |
| FACILITY | 28 | monitoring of process or control device parameters as surrogate |
| FACILITY | 29 | monitoring of process or control device parameters as surrogate |
| FACILITY | 6  | record keeping/maintenance procedures                           |
| FACILITY | 30 | record keeping/maintenance procedures                           |
| FACILITY | 31 | monitoring of process or control device parameters as surrogate |
| FACILITY | 32 | monitoring of process or control device parameters as surrogate |
| FACILITY | 33 | monitoring of process or control device parameters as surrogate |
| FACILITY | 34 | monitoring of process or control device parameters as surrogate |
| FACILITY | 35 | monitoring of process or control device parameters as surrogate |

### **Basis for Monitoring**

This title V permit renewal specifies special operating/monitoring conditions, recordkeeping and reporting required to verify compliance with applicable requirements. The basis for monitoring for these requirements is as follows:

#### **Applicable Federal Requirement 6NYCRR201-3.2(c)(6):**

General Mills operates one (1) diesel fired emergency generator at the Flour Mill. This generator is considered an exempt source if utilized for emergencies only. As proof of exempt eligibility for the emergency generator, the facility must maintain monthly records which demonstrate that the engine is operated less than 500 hours per year, on a rolling 12-month total basis. Hours of operation are recorded using an hour counter. Each month the hours of operation are recorded in a permanently bound log book or in electronic format stored on a computer diskette or compact disk. To insure proper performance, the emergency generators must be operated and maintained according to manufacturer's specifications. Records demonstrating hours of operation, the manufacturer's maintenance requirements and the maintenance performed on these sources shall be kept on-site for five years and be readily available to NYSDEC representatives upon request.



**Applicable State Requirement 6NYCRR201-7 (40CFR63, Subparts DDDDD and YYYY) :**

General Mills is required to track individual and total HAP emissions on a rolling 12-month basis to verify compliance with their facility-wide 9 tpy and 24 tpy limit. General Mills accepted this limit to avoid the requirement of 40CFR63, Subparts DDDDD and YYYY.

**Applicable Federal Requirement 6NYCRR 212:**

General Mills is required to implement certain monitoring, maintenance and recordkeeping requirements to maintain optimum overall removal efficiencies for the fabric filters throughout the flour and grain mills. This is necessary to comply with the 0.15 gr/dscf and 0.050 gr/dscf particulate concentration limits specified in 6NYCRR212.3(b) and 6NYCRR212.(c), respectively. General Mills developed a Preventative Maintenance Plan for the maintenance of the filters which includes monthly uptime inspections and semiannual downtime inspections. Records of maintenance and monitoring must be maintained onsite for five years.

**Applicable Federal Requirement 6NYCRR 212.3(b):**

General Mills must operate their flour and grain mill in accordance with the requirements specified in this condition to comply with the 0.15 gr/dscf particulate concentration limit specified in 6NYCRR212.3(b). This includes the use of particulate control equipment on all emission points that exceed the allowable limit without control. This equipment must be operated according to design specifications any time that the associated process is operating. Maintenance must be carried out according to the preventative maintenance program. To prevent baghouse blowouts, General Mills changes baghouse filters on a regular basis prior to exhaustion according to a custom schedule. Magnehelic and/or Photohelic gauges broken bag defectors and alarms must be used to monitor the control equipment. Records of inspections, observations and maintenance performed must be kept on-site for a minimum of 5 years.

**Applicable Federal Requirement 6NYCRR 212.4(c):**

General Mills must operate their flour and grain mill in accordance with the requirements specified in this condition to comply with the 0.05 gr/dscf particulate concentration limit specified in 6NYCRR212.4(c). This includes the use of particulate control equipment on all emission points that exceed the allowable limit without control. This equipment must be operated according to design specifications any time that the associated process is operating. Maintenance must be carried out according to the preventative maintenance program. To prevent baghouse blowouts, General Mills changes baghouse filters on a regular basis prior to exhaustion according to a custom schedule. Magnehelic and/or Photohelic gauges broken bag defectors and alarms must be used to monitor the control equipment. Records of inspections, observations and maintenance performed must be kept on-site for a minimum of 5 years.

Seven of these emission sources are subject to the requirements of 40CFR64, Compliance Assurance Monitoring, which includes daily monitoring of the pressure drop across the associated baghouses and other more stringent requirements.

**Applicable Federal Requirement 6NYCRR 212.6(a):**

To verify compliance with the opacity limit specified under 6NYCRR212.6(a), General Mills must conduct daily visual scans of the emission points at the Flour Plant. If any opacity, particulate fallout or staining on the Plant's outside walls is observed, General Mills must determine the cause and rectify the problem. If visible emissions greater than 0% persist, General Mills must conduct a Method 9 opacity test to determine if the opacity is 20% or greater, in violation of 6NYCRR212.6(a). Daily observations must be recorded in a permanently bound notebook, which must be kept on-site for at least 5 years for NYSDEC review.

Seven of these emission sources are subject to the requirements of 40CFR64, Compliance Assurance Monitoring, which includes daily monitoring of the pressure drop across the associated baghouses and other



more stringent requirements.

**Applicable Federal Requirement 40CFR 60-DD.302 (b) (1):**

To comply with the particulate emission limit of 0.023 grams per dry standard cubic meter (or 0.01 grains per dry standard cubic foot), General Mills will operate two baghouses with 99.9% removal efficiency each for the particulate exhaust from the ship's enclosed unloading leg and silo hopper. One of these baghouses also controls dust inside the ship's hold to prevent explosions and minimize fugitive emissions. General Mills must operate this equipment according to design specifications any time that the associated process is operating. In accordance with 40CFR64, to verify compliance with the 0.01 gr/dscf limit, the baghouse pressure gauges must be monitored daily and special procedures followed if the pressure is determined to be out of the normal operating range. In addition, monitoring, maintenance, reporting and recordkeeping must be carried out according to the monitoring conditions 6NYCRR212, 6NYCRR212.4(c) and 40CFR64 in the title V permit.

**Applicable Federal Requirement 40CFR 60-DD.302 (b) (2):**

This condition requires that the opacity of emissions from a grain elevator, or other affected source subject to Subpart DD, be no greater than 0 percent. To verify compliance with this opacity limit in accordance with 40CFR64, a General Mills representative must observe particulate emissions from the ship unloading operations a minimum of one time per day for each grain delivery using Reference Method 9 or modified Reference Method 22. The observations shall be documented in a permanently bound logbook, indicating date, time, weather condition, observation, i.e. were any particulate emissions observed, and observer's name. The remaining time opacity shall be monitored via General Mills or ship personnel. Any opacity greater than 0% is a violation, at which time ship unloading of grain shall cease until the problem is resolved. General Mills must contact the NYSDEC Region 9 office as soon as possible via telephone or e-mail and submit a written report describing the incident and the corrective action taken within 30 days of the violation. Records relating to opacity observations, corrective actions, and performance testing shall be kept on-site for five years and be available for NYSDEC review upon request.

**Applicable Federal Requirement 40CFR 60-DD.302 (c) (2)**

This condition requires that the opacity of fugitive emissions from any grain handling operations at an affected source subject to Subpart DD, be no greater than 0 percent. For a ship unloading station the grain handling operations include the transfer of grain from the ship's hold to the turret onto and along the conveyor belt and the transfer of grain to the silo hopper from the conveyor belt. To verify compliance with this opacity limit, a General Mills representative must observe fugitive particulate emissions from the ship unloading operations a minimum of one time per day for each grain delivery. The observations shall be documented in a permanently bound logbook, indicating date, time, weather condition, observation, i.e. were any particulate emissions observed, and observer's name. The remaining time opacity shall be monitored via General Mills or ship personnel. Any opacity greater than 0% is a violation, at which time ship unloading of grain shall cease until the problem is resolved. General Mills must contact the NYSDEC Region 9 office as soon as possible and submit a report within 30 days of the violation. Records shall be kept on-site for five years.

Fugitive emissions from the ship's hold and other areas not subject to Subpart DD must comply with the opacity requirements of 20% or less specified under 6NYCRR212.6(a).

**Applicable Federal Requirement 40CFR 60-DD.302 (d)**

This condition requires that the unloading leg of the ship be totally enclosed and ventilated to a control device at a rate of at least 40 actual cubic feet per bushel of grain handled. The system must be maintained to meet these requirements and ensure compliance with 40CFR60.302(b) by monitoring the grain unloading rate for each delivery.

**Applicable Federal Requirement 40CFR 64**

General Mills operates nine sources that have potential pre-control device emissions of PM/PM-10 equal to or



greater than the 100 tons per year (tpy) threshold for a major source. Emission points 0061G and 0069G associated with the grain handling operations at the ship unloading station are subject to the 0.01 gr/dscf and 0% opacity limits specified in 40CFR60, Subpart DD. The seven (7) remaining emission sources listed above are subject to 0.05 grains/dscf and 20% opacity limits specified under 6NYCRR212.4(c) and 6NYCRR212.6, respectively. To ensure compliance with the continuous assurance monitoring (CAM) requirements as specified in 40CFR64, General Mills must fulfill these requirements as specified in the title V permit, as well as, the applicable general operating, inspection, preventative maintenance and reporting requirements detailed under 6NYCRR212, 6NYCRR212.4(c), 6NYCRR212.6(a) and 40CFR64.