

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2008**

Region: Fayetteville Regional Office
County: Robeson
NC Facility ID: 7800159
Inspector's Name: Mitchell Revels
Date of Last Inspection: 01/16/2008
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Campbell Soup Supply Company Facility Address: Campbell Soup Supply Company 2120 Highway 71 North Maxton, NC 28364 SIC: 2032 / Canned Specialties NAICS: 311422 / Specialty Canning Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 7800159.08A Date Received: 01/08/2008 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04090/T23 Existing Permit Issue Date: 08/18/2006 Existing Permit Expiration Date: 07/31/2008		
Lorraine Sampson Environmental Coordinator (910) 844-1378 2120 NC Highway 71 North Maxton NC, 28364	Mark Cacciatore Senior Director of Operations - Maxton 2120 NC 71 Highway North Maxton NC, 28364	Hope Walters Utilities Manager (910) 844-1261 2120 Highway 71 North Maxton NC, 28364			
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2008			Comments / Recommendations: Issue 04090/T24 Permit Issue Date: date, 2008 Permit Expiration Date: date, 2013		

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**04090T13**) was issued on **August 18, 2006**, and is currently scheduled to expire on **July 31, 2008**. The renewal application was received on **January 8, 2008**. This date was not at least nine months prior to the expiration date. Therefore, the existing permit could expire if the renewal permit has not been issued prior to **July 31, 2008**. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is a canned soup production facility.

III. History/Background/Application Chronology

August 18, 2006 – Permit **04090T24** was issued as an administrative amendment. It should be noted that the permit and IBEAM do not match. The revision number in IBEAM is the correct version.

January 8, 2008 – Permit application **7800159.08A** was received for the renewal of the Title V permit. This application was not received prior to nine months before the expiration date of **July 31, 2008**.

January 23, 2008 – Mark Cuilla sent add info email to Permittee requesting that they address CAM demonstration submittal (calculations/applicability) and verify if they wanted temporary boiler removed from the permit.

January 28, 2008 – Permit **04090T24** was administratively replaced with **04090T23** to correct an error in permit number only. It should be noted that the permit and IBEAM now match. The correct permit revision numbered permit has been sent to the Permittee. This modified permit will be the basis of the renewal.

January 29, 2008 – Received FRO Air Permit Regional P&O for the renewal application. See Section IX of this Document for a discussion of stipulation modifications.

January 30, 2008 – Received email verification from Christy Richardson of FRO that the Permittee does wish to remove the reference to temporary boiler (**ID No. ES-025**).

February 1, 2008 – Received CAM calculations from Permittee via email. See Section VI of this Document for a discussion.

February 7, 2008 – DRAFT permit sent to Permittee, Fayetteville Regional Office, and Title V Coordinator for comment prior to public notice and EPA review. FRO comments received **February 8, 2008** and incorporated where necessary. Permittee comments received **March 11, 2008** and incorporated where necessary.

Date, 2008 – DRAFT permit sent to public notice and EPA review.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	-updated permit revision number
Cover	-	-updated permit revision numbers -amended all dates -updated shell language
TOC	-	-updated shell language -removed reference to Part II
All	Header	-updated permit revision number
3	Equipment Table	-removed reference to temporary boiler (ID No. ES-025) -removed asterisk language

Page(s)	Section	Description of Change(s)
4	2.1 A (table) 2.1 A.1.a 2.1 A.1.b 2.1 A.1.c	-clarified limits/standards for PSD Avoidance -corrected cross reference -added ID Nos. -corrected cross reference -added paragraph title and ID Nos.
5	2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.2.d 2.1 A.2.e 2.1 A.2.f 2.1 A.3.a 2.1 A.3.b	-added ID Nos. -corrected cross reference -updated shell language and added ID Nos. -updated shell language and added ID Nos. -updated shell language -added "no reporting" language -updated shell language -corrected cross reference
6	2.1 A.3.c 2.1 A.3.d 2.1 A.3.e 2.1 A.3.f 2.1 A.4 2.1 A.4.a 2.1 A.4.b	-added "no MRR" language and ID Nos. -updated shell language and added ID Nos. -updated shell language -added "no reporting" language -corrected rule citation -added ID Nos. -corrected cross reference
7	2.1 A.4.c	-updated shell language and added ID Nos.
8	2.1 B (table) 2.1 B.1.a 2.1 B.1.b 2.1 B.1.c 2.1 B.2.a 2.1 B.2.b	-clarified limits/standards for PSD avoidance -corrected cross reference -added ID Nos. -corrected cross reference -added "no MRR" language -corrected cross reference
9	2.1 B.2.c 2.1 B.2.d 2.1 B.2.e 2.1 B.2.f 2.1 B.3.a 2.1 B.3.b 2.1 B.3.c	-updated shell language and added ID Nos. -updated shell language and added ID Nos. -updated shell language -added "no reporting" language -updated shell language -corrected cross reference -added "no MRR" language
9-10	2.1 B.3.d	-updated shell language and added ID Nos.
10	2.1 B.3.e 2.1 B.3.f 2.1 B.4 2.1 B.4.a 2.1 B.4.b 2.1 B.4.c	-updated shell language -added "no reporting" language -corrected rule citation -updated shell language and added ID Nos. -corrected cross reference -updated shell language
11	2.1 B.5 2.1 B.5.a 2.1 B.5.b	-corrected rule citation -updated shell language -added testing language
12	2.1 B.5.c 2.1 B.5.d 2.1 B.5.e	-updated shell language -added ID Nos. -added ID Nos.

Page(s)	Section	Description of Change(s)
13	2.1 C.1.a 2.1 C.1.b 2.1 C.1.c 2.1 C.1.d 2.1 C.1.e	-added ID Nos. -corrected cross reference -added ID Nos. and updated shell language -updated shell language -updated shell language
14	2.1 C.2.a 2.1 C.2.b 2.1 C.2.c 2.1 C.2.d	-updated shell language -corrected cross reference -updated shell language and added ID Nos. -updated shell language
15	2.1 D	-amended equipment description
-	2.1 E	-removed Section for temporary boiler (ID No. ES-025)
16	2.2 A 2.2 A.1.c 2.2 B 2.2 B.1	-clarified applicable equipment -amended RMP requirement to include 5 year update requirement per 68.150 -clarified applicable equipment -corrected rule citation
17	2.2 C 2.2 C.1.a 2.2 C.1.b 2.2 D	-clarified applicable equipment -added ID Nos. -added ID Nos. -added paragraph for the addition of odor regulation
18-27	General Conditions	-updated shell conditions (v2.19)
-	Part II	-removed Part II

It should be noted that each emission source and control device description were updated according to current ESM practices. There were only minor addition, deletions, or modifications as shown in the following table:

Current Description	New Description
One natural gas-fired Boiler No. 7 (99.9 million Btu per hour maximum heat input; ID No. ES-025)	Source end-dated per Permittee request

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0501, Compliance with Emission Control Standards
15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 2D .1100, Control of Toxic Air Pollutants
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

A regulatory review for these existing requirements will not be included in this document.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The current permit requires that the Permittee comply with all applicable provisions, including the notification, testing, recordkeeping, and monitoring requirements contained in 15A NCAC 2D .0524 as promulgated in 40 CFR 60, Subpart Dc for the temporary boiler (**ID No. ES-025**). The Permittee is required to maintain records of fuel fired during each month. However, as part of this renewal, the Permittee has requested that this equipment be removed from the permit. Therefore, the requirement to comply with this Subpart will also be removed.

NESHAPS/MACT – The Permittee is not currently subject to any National Emission Standards for Hazardous Air Pollutants promulgated in 40 CFR Part 63. The facility is classified as a Title III minor facility because potential HAP emissions are below the major source thresholds. This permit renewal does not affect this status.

PSD – The Permittee is currently subject to multiple PSD Avoidance conditions for its boilers (**ID Nos. ES-020, ES-021, and ES-022**). The following table indicates the current requirements:

Emission Source(s)	Regulated Pollutant	Limits/Standards
ES-020	Sulfur dioxide	Less than 250 tons per 12-month rolling period
ES-020	Nitrogen oxides	Less than 250 tons per 12-month rolling period
ES-021 and ES-022	Sulfur dioxide	Less than 250 tons per 12-month rolling period combined
ES-021 and ES-022	Nitrogen oxides	Less than 250 tons per 12-month rolling period combined
ES-021 and ES-022	-	Less than 250 million Btu per hour total average maximum heat input rate combined

The permit renewal does not affect this status.

It should be noted that the temporary boiler (**ID No. ES-025**) is currently also subject to a 40 ton per year PSD Avoidance limit for nitrogen oxides. As a result of the request to remove this source, the associated limit is also being removed from the permit.

112(r) – The Permittee is currently subject to Section 112(r) of the Clean Air Act and is required to comply with all applicable requirements in accordance with 40 CFR Part 68. The Permittee was required to submit a Risk Assessment Plan on June 21, 1999 or as otherwise specified in 40 CFR 68.10. The renewed permit has been modified to require the submittal of an updated plan according to the schedules contained in 40 CFR 68.150. The following language now appears in the renewed permit as Section 2.2 A.1:

1. 15A NCAC 2Q .0508(g): PREVENTION OF ACCIDENTAL RELEASES – SECTION 112(r) OF THE CLEAN AIR ACT

a. *The Permittee is subject to Section 112(r) of the Clean Air Act and shall comply with all applicable requirements in accordance with 40 CFR Part 68.*

Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

b. *The Permittee shall submit a Risk Management Plan (RMP) to EPA pursuant to 40 CFR Part 68.150 prior to **June 21, 1999** or as specified in 40 CFR Part 68.10.*

c. *The Permittee shall revise and update the RMP submitted under 40 CFR 68.150 by **June 21, 2009** and at least once every five years after that date or most recent update required by 40 CFR 68.190(b)(2) through (b)(7), whichever is later.*

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following equipment/control device relationships exist:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-007 through ES-015	Nine grain and bulk flour storage silos	CD-002 through CD-010	Nine sock type filters (360 square feet of filter area each)
ES-023	One hydrated lime silo	CD-012	One bin vent filter (250 square feet of filter area)

The following table outlines the specific permit conditions for each source/control device arrangement and if the control device is installed to comply with that requirement:

Emission Source ID No(s).	Control Device ID No(s).	Permit Condition(s)	Control Equipment Installed to Meet Permit Limit?
ES-007 through ES-015	CD-002 through CD-010	15A NCAC 2D .0515 15A NCAC 2D .0521	Yes Yes
ES-023	CD-012	15A NCAC 2D .0515 15A NCAC 2D .0521	Yes Yes

The Permittee supplied the emission calculations that were presented as part of the original Title V permit application and indicated that nothing has changed concerning these sources.

Potential pre-controlled emissions from the nine-grain and bulk flour storage silos are as follows:

$$\begin{aligned} \text{Emission Rate} \times \text{Maximum hours of operation} &= 0.25 \text{ pounds per hour} \times 8760 \text{ hours per year} \\ &= 2190 \text{ pounds per year (1.095 tons per year)} \end{aligned}$$

Estimated emissions from each silo are less than the CAM threshold level; therefore, CAM does not apply.

Potential pre-controlled emissions from the hydrated lime silo are as follows:

$$\begin{aligned} \text{Emission Factor} \times \text{Maximum air flow} \times 60 \text{ minutes per hour} &= 30 \text{ grains/SCF} \times 1500 \text{ ACFM} \times 60 \\ &= 385.71 \text{ pounds per hour} \end{aligned}$$

$$\begin{aligned} \text{Pounds per hour} \times \text{hours per fill} \times \text{fills per year} &= 385.71 \times 1.75 \times 7 \\ &= 4725 \text{ pounds per year (2.36 tons per year)} \end{aligned}$$

Estimated emissions from this silo are less than the CAM threshold level; therefore, CAM does not apply.

VII. Facility Wide Air Toxics

The Permittee is required to comply with a 15A NCAC 2D .1100 modeled emission rate for formaldehyde of 0.05 pounds per hour for its fuel burning sources (**ID Nos. ES-020, ES-021, and ES-022**). The Permittee is required to maintain records of the boiler information as necessary to determine that this limit is not exceeded.

It should be noted that this toxic limit was originally introduced to the permit when Campbell Soup owned and operated a can manufacturing facility. That combined facility was subject to a modeled rate of 0.085 pounds per hour. When Silgan Can purchased the can operations, it took the portion of the toxic limit associated with those emission sources. The remaining portion is attributable to Campbell Soup's boilers. The Fayetteville Regional Office requested that RCO investigate the continued need for this requirement. It was determined that the modeled rate pre-dated the exemption for combustion sources and thus was included. The Permittee does have the option of removing this requirement. However, it would require that a new modeling demonstration be conducted at the original outside property boundary, including what is now Silgan Can, for the potential to emit from the boilers taking into account any physical or operational limitations/restrictions on those boilers. Using the "doughnut rule", Campbell Soup would not have to take into account any formaldehyde from Silgan Can.

The Permittee has not requested that this limit be removed as part of this renewal; therefore, the condition will remain in effect. The FRO agrees with this assessment.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest year's emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)
CO	42.09
NO _x	82.72
PM ₁₀	6.70
SO ₂	92.93
VOC	2.75
Total HAP/TAP	0.953

IX. Stipulation Review

The FRO has noted the following items that should be addressed as part of this renewal application:

1. Correction of the permit revision number. The current air permit number (on paper) is **04090T24**. The current air permit revision number listed in IBEAM is **T23**. This needs to be corrected to avoid confusion. *Agree; it was determined that T24 was inadvertently written on the issued permit. An administratively amended permit has been sent to the Permittee indicating that T23 is the actual true permit revision number. This renewed permit will be T24.*
2. Removal of the natural gas-fired boiler No. 7 (**ID No. ES-025**) per the facility's request. *Agree, the source has been removed from the permit per the Permittee's request.*
3. Formaldehyde toxics limit and possibly remove. *Disagree, Permittee has not formally submitted as request to remove requirement with appropriate modeling demonstration. See Section VII of this Document for a discussion.*
4. Address CAM applicability to all silos. *Agree, the Permittee presented a CAM applicability demonstration indicating that CAM does not apply to its control devices. See Section VI of this Document for a discussion.*

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit was placed in a newspaper of general circulation in the area where the facility is located. The notice provided for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice were sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant was provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit was provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina is an affected State within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

FRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with FRO's recommendation to issue the renewed air permit.