Facility Identification Data
Name: GENERAL MILLS OPERATIONS INC
Address: 54 S MICHIGAN AVE
BUFFALO, NY 14203

Owner/Firm
Name: GENERAL MILLS INC
Address: PO BOX 113
MINNEAPOLIS, MN 55440-1113, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
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BUFFALO, NY 14203-2999
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Division of Air Resources:
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Air Permitting Contact:
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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
An application was submitted for the renewal of the title V permit for the Co-Gen/Boiler House Plant. The title V permit renewal contains no significant changes in plant operations. A minor change that occurred was the elimination of No. 6 oil to boiler No. 1, Cleaver Brooks DLD-68E.

Attainment Status
GENERAL MILLS OPERATIONS INC 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 < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description
General Mills was issued three separate Title V permits, one for each plant. This permit is specifically for the Co-Generation/Boiler House Plant which generates steam and electricity to operate processes at the Cereal and Flour Plants. The Cogeneration/Boiler House includes a "packaged" gas fired 3.8 MW stationary gas turbine and a waste heat boiler, which produces electricity and steam used by General Mills. Any excess electricity is sent to the regional power grid. The waste heat boiler is also operated without the turbine to produce process steam. When additional steam is required to operate processes at the Cereal Plant, two auxiliary mid-sized boilers are also used. Sources of emissions at this plant include sulfur dioxide, oxides of nitrogen, carbon monoxide, volatile organic compounds, particulates, PM-10 and hazardous air pollutants.

Permit Structure and Description of Operations
The Title V permit for GENERAL MILLS OPERATIONS INC 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 INC is defined by the following emission unit(s):
Emission unit U00452 - This Emission Unit consists of a "packaged" cogeneration unit. A 3.8 MW Solar Centaur H stationary gas turbine with a maximum design heat input capacity of 52.3 MMBTU/hr and a Deltak waste heat boiler with a maximum design heat input capacity of 53.6 MMBTU/hr (when the turbine is in service) are utilized to generate electricity and steam. The maximum design heat input capacity of the Deltak boiler operated with the turbine out of service is 90.8 MMBTU/hr. The Deltak boiler is equipped with two Coen CPF 33 register type burners, capable of firing natural gas. Any electricity and steam generated is used by General Mills, with excess electricity sent to the regional power grid. This emission unit is fueled solely with natural gas.

Emission unit U00452 is associated with the following emission points (EP):
0452A, 0452B
It is further defined by the following process(es):
Process: 52A is located at Ground Floor, Building 77 - This process consists of the operation of the Solar Centaur H gas turbine and, if needed, the Deltak waste heat boiler, both fueled solely with natural gas. The maximum throughput of natural gas to the turbine and the waste heat boiler are 52,300 cfh and 53,600 cfh (with the turbine in service), respectively. Sources of emissions from this process are: sulfur dioxide, nitrogen oxides, carbon monoxide, particulates, PM-10, volatile organic compounds and hazardous air pollutants.

There are 2 emission stacks associated with Process 52A. When the demand for steam at the Cereal Plant is large, heat created during the generation of electricity in the turbine is sent to the Deltak boiler to produce process steam, exhausting emissions though EP 0452B. If the process steam demand is reduced, the heat from the turbine is diverted to Emission Point 0452A, by-passing the Deltak waste heat boiler.
Process: 52B is located at Ground Floor, Building 77 - This process is the Deltak Boiler operating on natural gas to produce process steam for the Cereal Plant and/or heat for the Flour Mill, without operating the Solar turbine. One or two burners may be ignited during this process, depending on the steam demand. The maximum throughput of natural gas to the boiler is 90,800 cfh. Sources of emissions from this process are: sulfur dioxide, nitrogen oxides, carbon monoxide, particulates, PM-10, volatile organic compounds and hazardous air pollutants.

Emission unit U00451 - This emission unit consists of two mid-size boilers, a Cleaver Brooks DLD-68E (Boiler No. 1) and a Babcock Wilcox FJ-18-36 (Boiler No.2), with maximum design heat input capacities of 66.9 MMBTU/hr and 58.8 MMBTU/hr, respectively. The Cleaver Brooks boiler began operation on March 26, 1976 and is equipped with a dual fuel CB Model CN-5 burner. This boiler is currently operated with natural gas only. In April 2007 the supply line for No. 6 fuel oil was permanently disconnected from Boiler No. 1 to avoid the requirements of 6NYCRR227.2(b)(1). The B&W boiler, installed in June of 1950, was originally a coal fired boiler. This boiler was retrofitted with a dual fuel Coen CO 160 FYR burner in May of 1968 and is capable of burning natural gas or No. 6 fuel oil. Both boilers exhaust into a common stack, emission point 0451A. The two boilers are used to supplement the waste heat boiler identified in Emission Unit U-00452 that produces steam for use in the Cereal Plant.

Emission unit U00451 is associated with the following emission points (EP):
0451A
It is further defined by the following process(es):
Process: 51A is located at FIRST, Building 21 - Process 51A consists of the operation of the Cleaver Brooks DLD-68E (ES 0451A (Boiler No. 1)) and/or Babcock Wilcox FJ-18-36 (ES 0451B (Boiler No. 2)) boilers with

natural gas to generate steam for the Cereal Plant. The maximum design heat input capacities of these boilers are 66.9 MMBTU/hr and 58.8 MMBTU/hr, respectively. Sources of emissions from this process include sulfur dioxide, nitrogen oxides, carbon monoxide, particulates, PM-10, volatile organic compounds and hazardous air pollutants.

Process: 51C is located at FIRST, Building 21 - Process 51C consists of the combustion of residual (No. 6) fuel oil in the Babcock Wilcox FJ-18-36 boiler (ES 0451B (Boiler No. 2)) to generate steam for processes at the Cereal Plant. Sources of emissions from this process include sulfur dioxide, nitrogen oxides, carbon monoxide, particulates, PM-10, volatile organic compounds and hazardous air pollutants.

Title V/Major Source Status

GENERAL MILLS OPERATIONS INC is subject to Title V requirements. This determination is based on the following information:
General Mill's facility-wide potential to emit (PTE) SO2 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). 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 Mills has limited their PTE methyl bromide (individual HAP) to less than 10 tpy and their PTE total hazardous air pollutants (HAPs) to less than 25 tpy (see Flour Mill, Permit DEC ID No. 914020056500175). By accepting these federally enforceable CAPs, General Mills will not be required to comply with the requirements of 40CFR63 Subpart DDDDD - Industrial, Commercial and Institutional Boilers and Process Heaters and 40CFR63 Subpart YYYY- Combustion Turbines. 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).

Program Applicability

The following chart summarizes the applicability of GENERAL MILLS OPERATIONS INC 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 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 categorizeprocesses 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
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
2-02-002-03	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine: Cogeneration

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. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that 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	
0NY998-00-0	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.

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 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 Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY		49	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	28, 29, 30	Prevention of Significant Deterioration
U-00452/-/52A/0452A	40CFR 60-A	41	
U-00452/-/52A/0452A	40CFR 60-A.12	44	General provisions - Circumvention
U-00452/-/52A/0452A	40CFR 60-A.4	42	General provisions - Address
U-00452/-/52A/0452A	40CFR 60-A.7	43	General provisions - Notification and recordkeeping
U-00452/-/52A/0452A	40CFR 60-GG.332(a)(2)	45	NOx Standard units >=10 and <=100 (mmBtu/hr) or with a base load <= 30 MW and 100 mmBtu/hr.
U-00452/-/52A/0452A	40CFR 60-GG.332(k)	46	Exemption from Section 332(a) of this Subpart.
U-00452/-/52A/0452A	40CFR 60-GG.333(b)	47	Standard for Sulfur Dioxide
U-00452/-/52A/0452A	40CFR 60-GG.334(h)(3)	48	Allowance not to monitor sulfur or nitrogen for natural gas
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	22	
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	
FACILITY	6NYCRR 201-1.4	50	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 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 38, 39	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)	25	
FACILITY	6NYCRR 201-6.5(f)(6)	17	
FACILITY	6NYCRR 201-6.5(g)	26	
FACILITY	6NYCRR 201-7	27, 28, 29, 30, 31	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	51	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215	8	
FACILITY	6NYCRR 225-1.2(d)	32	Sulfur-in-fuel limitations - Table 2
FACILITY	6NYCRR 225-1.8(a)	33, 34	Reports, sampling and analysis.
FACILITY	6NYCRR 225-1.8(d)	35	Reports, sampling, and analysis
U-00451/0451A/51C/0451B	6NYCRR 227.2(b)(1)	40	
FACILITY	6NYCRR 227-1.3	36	Smoke Emission Limitations.
FACILITY	6NYCRR 227-1.6	37	
FACILITY	6NYCRR 227-2	28, 31	Reasonably available control technology for NOx

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 there 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 INC has been determined to be subject to the following regulations:

40CFR 52-A.21
This citation applies to facilities that are subject to Prevention of significant deterioration of air quality (PSD) provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b) (23) (i).

In 1989, General Mills modified their Boiler House by the addition of a co-generator. This included the installation of a stationary gas turbine and a waste heat boiler. Due to that modification, a PSD applicability determination was conducted. The outcome was that General Mills was subject to PSD requirements for SO2 and NOx emissions. At that time, General Mills chose to cap the Co-Gen/Boiler House emissions at less than 91.6 tpy NOx and less than 167.1 tpy SO2 to avoid the requirements of PSD. General Mills must use the latest NOx stack test data as an emission factor to determine compliance with the 12-month rolling 91.6 tpy cap. In lieu of onsite maintenance, Solar Turbine, Inc. routinely exchanges General Mills turbine with a factory rebuilt turbine every three to five years. A stack test is required for each turbine exchange to verify possible changes in the emission rate of NOx.

This title V permit contains two monitoring conditions under 6NYCRR201-7 that limit the Co-Gen/Boiler Plant emissions of NOx and SO2 to 91.5 and 167.0 tpy, respectively to avoid the requirements of 40CFR52.21, PSD. To ensure compliance with the PSD emissions limit for NOx, a third condition requires a stack test of the NOx emission rate from the turbine after a turbine exchange occurs.

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.12
This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

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) and the Regional NYSDECoffice.

40CFR 60-A.7
This condition details the notification requirements for any source subject to a New Source Performance Standard including dates of construction, reconstruction, anticipated and actual initial start-up, physical or operational changes and opacity observations.

40CFR 60-GG.332 (a) (2)
This regulation provides the equation to be used to determine the allowable emissions of oxides of nitrogen (NOx) from a gas turbine with a heat input greater than 10 million BTU per hour and less than 100 million BTU per hour.

40CFR 60-GG.332 (k)
The regulation exempts gas turbines, with a heat input greater than 10 million BTU and that normally fire natural gas, from section 332(a)92) of Subpart GG when they fire an emergency fuel.

40CFR 60-GG.333 (b)
This regulation limits the amount of sulfur in the fuel burned in a gas turbine to 0.8% by weight

40CFR 60-GG.334 (h) (3)
This regulation allows the owner or operator of a gas turbine to not monitor the fuel for sulfur content if the fuel meets the 40 CFR 60.331(u) definition of natural gas.

6NYCRR 200 .3
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6NYCRR 201-6.5 (f)
This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit NOx emissions and SO2 emissions from the combustion sources at the Co-Gen/ Boiler House are capped at 91.5 tpy and 167.0 tpy, respectively to avoid the requirements of 40CFR52.21 - PSD. To verify compliance with the NOx CAP, there is also a requirement to conduct a stack test on NOx emissions from the turbine for each turbine exchange. Facility-wide NOx emissions are also capped at 99 tpy to avoid the requirements of 6NYCRR227-2 - NOx RACT.

6NYCRR 225-1.2 (d)
The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6NYCRR 225-1.8 (a)
Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 225-1.8 (d)
This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

6NYCRR 227 .2 (b) (1)
This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6NYCRR 227-1.3
This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6NYCRR 227-1.6
This requirement details the corrective action necessary to rectify a violation of any Provision of Part 227-1. In addition, it allows the Department to seal any combustion source that fails to implement the specified corrective action and prohibits the owner or operator from removing that seal and operating the source. Only the Department may remove a seal affixed to a stationary combustion installation upon completion of the corrective action.

6NYCRR 227-2
This regulation limits the emission of oxides of nitrogen (NOx) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).General Mills has a facility-wide potential to emit NOx which is greater than the applicability threshold of 100 tpy specified for this regulation. This condition limits the total

emissions of NOx from stationary combustion installations (boilers, combustion turbines, internal combustion engines, furnaces, ovens, etc.) throughout the facility, including the Cereal, Flour and Co-Gen/Boiler Plants, to 99 tons per year for any 12 consecutive months. Compliance with this emissions CAP will allow General Mills to avoid the requirements of 6NYCRR 227-2, NOx RACT.

Non Applicability Analysis
List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
U-00452/-/52A/0452A	40CFR 60-GG.334(h)(2)	Nitrogen content of fuel in a gas turbine

Reason: General Mills is not required to monitor the nitrogen content of the fuel combusted in the turbine since they do not claim an allowance for fuel bound nitrogen to calculate the NOx limit under 40CFR60.332(a)(2).

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 INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-00452/-/52A/0452A	43	record keeping/maintenance procedures
U-00452/-/52A/0452A	45	intermittent emission testing
U-00452/-/52A/0452A	47	monitoring of process or control device parameters as surrogate
U-00452/-/52A/0452A	48	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	6	record keeping/maintenance procedures
FACILITY	32	work practice involving specific operations
FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance

		procedures
U-00451/0451A/51C/0451B	40	intermittent emission testing
FACILITY	36	monitoring of process or control device parameters as surrogate
FACILITY	37	record keeping/maintenance procedures

Basis for Monitoring

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

6NYCRR201-7: Capping 40CFR52.21

To verify compliance with the PSD CAPs on NOx and SO2 emissions, General Mills must monitor fuel usage and calculate emissions of these contaminants from the Co-Gen/Boiler House, on a monthly basis. The annual rolling total, determined by summing the individual monthly NOx and SO2 emissions during any consecutive 12-month period , must be compared to the limits of 91.5 tpy NOx and 167.0 tpy SO2, which were set to avoid the requirements of 40CFR52.21. If emissions exceed these limits, General Mills will be considered in violation of their PSD CAP(s) and that exceedance must be reported to the Department within 30 days. If General Mills is unable to comply with the emissions CAP(s) they will be subject to the requirements of PSD, which includes applying the Best Available Control Technology (BACT) to the turbine and waste heat boiler for the contaminant(s) whose CAP cannot be maintained. Annual reporting is required. Records must be maintained on-site for five years and be available for review by the Department or USEPA upon request. General Mills must also comply with a facility-wide CAP on NOx emissions of 99 TPY for any consecutive 12-month period to avoid the requirements of 6NYCRR227-2, Reasonably Available Control Technology (RACT) for Oxides of Nitrogen.

In lieu of conducting on-site maintenance, General Mills may exchange their turbine with a rebuilt turbine from the manufacturer. To verify that NOx emissions from the rebuilt turbine are equal to or less than the replaced turbine, a stack test is required. This is important since the NOx emission factor for the turbine is used to determine compliance with the NOx CAP for PSD and the NOx RACT.

6NYCRR201-7: Capping 6NYCRR227-2

Nitrous oxide emissions, which result mostly from combustion sources, such as boilers, furnaces, turbines, cars/trucks, etc. are responsible for ground-level ozone and acid rain (like sulfur dioxide), both of which destroy human health and the environment. Nitrous oxide emissions also contribute to global warming,.

This regulation requires that stationary combustion sources which emit nitrous oxides at 100 tons per year or more control NOx emissions through Reasonably Available Control Technology (RACT). To avoid the requirements of 6NYCRR Subpart 227-2, NOx RACT, General Mills chose to limit NOx emissions from the entire facility to 99 tpy or less. Each month, General Mills must calculate facility-wide NOx emissions based on fuel usage and emission factors specified in their title V permit. Throughout the facility, NOx is emitted from the boilers, turbine, ovens, furnaces, emergency generators, etc. Compliance is determined by summing the individual monthly NOx emissions from all stationary combustion sources during any consecutive 12-month period and comparing it to the 99 tpy CAP. Annual certification of compliance by General Mills is required. Records must be maintained on-site for five years and be available for inspection upon request.

40CFR60 Subparts A and GG:

The Solar gas turbine is subject to the requirements of 40CFR60 Subpart A - General Provisions and Subpart GG - Standards of Performance for Stationary Gas Turbines. Subpart GG includes a 150 ppm emission limit on NOx from the turbine and a limit of 0.8% sulfur by weight in fuel burned in the turbine. In accordance with recent changes made to Subpart GG, since General Mills does not claim an allowance for fuel bound nitrogen to calculate the emission limit, they are not required to monitor the nitrogen content of the natural gas combusted in the turbine. Compliance with the 150ppm NOx limit was verified in 1989 during an initial stack test. During that test the maximum concentration of 104 ppm NOx was determined at 75% operating capacity. As specified in

40CFR60.334(h)(3)(i), to verify the sulfur content of the natural gas combusted in the turbine General Mills uses "the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less ". All records, including sulfur content verification from the supplier, must be maintained on-site for review by inspectors from the USEPA and/or NYSDEC. Review of these records allows the inspectors to verify compliance with the requirements. Reporting is required semi-annually.

6NYCRR225-1.2 (d) and 6NYCRR225-1.8 (a):
The sulfur content in fuel oil and coal are limited by 6NYCRR225-1 to lower the sulfur dioxide emissions resulting from stationary combustion installations. When sulfur dioxide is exhausted to the air it combines with water to form sulfuric acid. When it rains, snows, etc. this acid enters lakes and rivers, contaminating drinking water and fish, making the bodies of water uninhabitable for aquatic organisms. It also is harmful to human health, trees and vegetation, buildings, etc.

Residual oil (No. 6) and distillate (No. 2) oil used throughout General Mill's Plants are subject to the sulfur in oil limit of 1.1 % by weight as specified under 6NYCRR225-1.2 (d). Compliance with this rule is verified through vendor certification of the sulfur content for each delivery of oil. Records are required to be maintained on-site for five years for review to verify compliance with these requirements. Annual compliance certification and semi-annual deviation reports are required .

6NYCRR227.2(b)(1):
This regulates particulate emissions from stationary combustion sources. Inhalable particulates are detrimental to human health, causing asthma and other lung diseases, heart disease and sometimes death. In cities and towns, particulates are responsible for reduced visibility and damage to painted surfaces and buildings.

The oil fired Babcock Wilcox FJ-18-36 (ES 0451B/Boiler No. 2) boiler in EU 00451 is subject to the requirements of 6NYCRR227.2(b)(1). Particulate emissions from the combustion of No. 6 oil in this boiler (Process 51C), exhausted through EP 0451A, are limited to 0.1 lb/MMBTU. Approval of a stack test protocol and the performance of a stack test are required prior to permit renewal to verify compliance with the specified limit.

To minimize particulate emissions, General Mills is also required to operate and maintain the oil fired boiler as specified by the manufacturer. Oxygen sensors must be calibrated at least quarterly. The boilers must be operated with sufficient oxygen to ensure complete combustion, without generating excessive NOx emissions. Boiler tune-ups are required annually.

Records of stack tests and protocols, boiler maintenance/tune-ups and oxygen sensor calibrations must be maintained on-site so that NYSDEC and/or USEPA inspectors may review them to verify compliance with these requirements. Reporting is required semi-annually.

6NYCRR227-1.3 and 6NYCRR211.3:
Opacity is regulated under 6NYCRR227-1.3 and 6NYCRR211.3 to control the emission of particulates, which when respired can harm human health and can also cause reduced visibility. An opacity determination is a surrogate method of determining compliance with the in-stack concentration limit for particulates.

All emission points at the Co-Gen/Boiler House Plant are subject to 6NYCRR227-1.3(a), which limits the average opacity of the emissions during any six consecutive minutes to less than 20%. A daily check of visible emissions while combusting oil is required to verify compliance with this rule. The observation of emissions greater than zero percent opacity will trigger an investigation to determine the cause, followed by corrective action. If visible emissions persist, a Method 9 opacity evaluation is required to determine whether the opacity limit has been exceeded. The facility is considered in violation of 6NYCRR227-1.3 if the opacity is determined to be greater than

20%. Records of daily observations and Method 9 analyses must be maintained on-site for five years so that the Administrator and/or the NYSDEC can review records and determine if General Mills has maintained compliance with these regulations. In addition to semi-annually, reporting is required any time a Method 9 analysis is conducted. Since all of the particulate emitting sources at the Co-Gen/Boiler House Plant are combustion sources, compliance with the 20% opacity limit specified under 6NYCRR211.3, may be verified via the monitoring requirements specified under 6NYCRR227-1.3(a).

6NYCRR201-6.5(f)(1):
In accordance with 6NYCRR201-6.5(f)(1), this title V permit includes a monitoring condition specifying operational flexibility at the Co-Gen/Boiler House Plant which allows General Mills to carry out minor changes without modifying the title V permit. This includes the ability to move equipment and/or exhaust points, and the replacement of the stationary gas turbine with a rebuilt turbine consistent with the turbine listed or equivalent. Turbine replacement may only be conducted in lieu of on-site routine maintenance and repairs. General Mills may change or modify existing processes provided no additional requirements are applicable, the emissions from the modified process are equal to or less than the source being modified or replaced , NSR and/or PSD is/are not applicable and an emissions cap is not required to avoid applicability. General Mills must maintain any required records on-site for five years.