



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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: DENISE C MATTHEWS

Address: 270 MICHIGAN AVE

BUFFALO, NY 14203-2915

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: JODI A HAMERNIK

Address: GENERAL MILLS OPERATIONS LLC

54 SOUTH MICHIGAN AVENUE

BUFFALO, NY 14203

Phone:7168573727

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 project is for the installation of a third dryer to the twin rotary dryers already present at Process 143 to remove moisture from product. An estimated emissions increase in PM of 545 lbs/yr actual emissions is expected. This process is uncontrolled. This modification is considered minor.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

The following changes were also made to the Title V permit as part of this modification:

- Emission Source Controls C068F, C069F, C082F and C083F, contained in Emission Unit (EU) U-0000F, were removed from the Title V permit. This equipment, which consisted of wet scrubbers with removal efficiencies of 30% to 60%, was used to control particulate emissions from the associated emission sources. General Mills ceased operation of the wet scrubbers for product sanitation and to reduce energy use. The wet scrubbers were removed from Emission Sources P068F and P069F in May 2010. The wet scrubbers remain in place at Emission Sources P082F and P083F, but are not operated. An evaluation of the uncontrolled sources was conducted based on stack test data from actual and similar sources. Particulate emissions from Emission Sources P068F, P069F, P082F and P083F, operated without the wet scrubbers, were estimated between 0.0075 grains per dry standard cubic foot (gr/dscf) and 0.0168 gr/dscf, which is well below the limit of 0.050 gr/dscf specified under 6NYCRR212.4(c). Process descriptions in the Title V permit for Processes 068, 069, 082 and 083 were amended to include these changes.
- Emission Point 00066, Process 066, Emission Source P066F and Emission Source Control C066F, contained in EU U-0000F, were removed from the Title V permit. General Mills removed this emission source from the Cereal Plant in May of 2005.
- The Description for EU U-0000F was modified to remove Emission Point 00066 and show Emission Points 00068, 00069, 00082 and 00083 as uncontrolled.
- In accordance with 6NYCRR6.5(f)(1), Operational Flexibility, General Mills replaced the wet scrubber at Emission Source P090P in May 2010 with a model that increased particulate removal efficiency from 70% to 98%. This permit modification includes a revision of the description of Emission Source Control C090P to account for this change.
- A mandatory condition under 6NYCRR201-6.5(a)(7) was added to the permit.

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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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 Operations, LLC. (General Mills) owns and operates a flour processing plant, a cereal processing plant and a cogeneration/boiler house plant. 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 Cereal Processing Plant which manufactures breakfast cereals in four emission units: U-0000B, U-0000F, U-0000P and U-0000K. Emission Unit U-0000B consists of six (6) processes in which bulk ingredients are unloaded, or loaded into storage bins via pneumatic methods. Emission Unit U-0000F and Emission Unit U-0000P consist of eighty-one (81) processes and emission sources where food grade ingredients are processed into consumer cereals. Emission Unit U-0000K consists of ten (10) processes in which cereal is packaged in preprinted boxes and readied for distribution. To reduce particulate emissions, General Mills employs control equipment such as fabric filters, cyclones or wet scrubbers/collectors on the exhaust ducts of the emission points at the Cereal Plant. The equipment at forty-four (44) of these emission points controls emissions through product recovery and is therefore considered part of the associated processes. The control equipment at the remaining twenty-eight (28) emission points is in place strictly to reduce particulate concentrations in process gas exhausted to the ambient air. Twenty-five (25) emission points at the Cereal Plant are uncontrolled. Cereal flavoring processes contained in EU U-0000P and EU U-0000F generate volatile organic compound (VOC) emissions which are emitted to the atmosphere through uncontrolled emission points. Certain exempt activities also contribute to the Cereal Plant's emissions; they include combustion of natural gas to produce heat for various processes and for pest management, activities associated with the packaging of consumer cereal products (example: printing of production dates on boxes), maintenance emissions and other related activities. Air contaminants emitted due to these activities include NOx, SO2, CO, VOCs, PM, PM-10 and HAPs.

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).



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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 U0000F - This emission unit consists of multiple emission sources and emission points. Food grade ingredients are processed into consumer cereals. Product recovery systems, including bag houses and cyclones are used to add recovered product back into the processes. Exhaust from these systems emit PM and PM-10 into the atmosphere. Emission Unit U-0000F consists of twenty-two emission points as follows: Six uncontrolled: 00068, 00069, 00081, 00082, 00083 and 00131; Nine with control equipment as part of the process: 00067, 00073, 00074, 00075, 00079, 00080, 00092, 00097 and 00101; Seven with control equipment for ambient air: 00070, 00071, 00072, 00077, 00078, 00093 and 00098. The application of pesticides for pest management at the Cereal Plant generates fugitive emissions of VOCs and hazardous air pollutants (HAPs). Products of combustion including NO_x, SO₂, CO, VOCs, HAPs, PM and PM-10 are emitted to the atmosphere from exempt natural gas fired process heaters and from integrated pest management using heat and other combustion sources. Other exempt activities also contribute to this unit's VOC emissions including graphic art activities associated with the packaging of consumer cereal products (example; printing of production dates on boxes), surface coating and other related activities. Trivial maintenance and construction related activities also generate emissions of VOCs.

Emission unit U0000F is associated with the following emission points (EP):

00067, 00068, 00069, 00070, 00071, 00072, 00073, 00074, 00075, 00077, 00078, 00079, 00080, 00081, 00082, 00083, 00092, 00093, 00097, 00098, 00101, 00131

Process: 067 is located at PENTHOUSE, Building 1 - The product is conveyed pneumatically to a filter receiver. The product is removed and drops into the process and the air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 068 is located at 8, Building 1 - This process is the drying of cooked grain based dough pellets in a dryer. Room air is circulated through the product bed. The air is then exhausted into the atmosphere through the emission point.

Process: 069 is located at 8, Building 1 - Cereal half product enters the system. Room air is heated and circulated through the product bed. The air is then exhausted into the atmosphere through the emission point.

Process: 070 is located at 9, Building 1 - Material is picked up and pneumatically conveyed to a product receiver. The material is separated from the air and the material then drops to the process below. The air is then exhausted into the atmosphere through the emission point.

Process: 071 is located at 9, Building 1 - Material is picked up and pneumatically conveyed to a product receiver where the material is separated from the air. The material drops into the process below and the



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

air is exhausted into the atmosphere through the emission point.

Process: 072 is located at 8, Building 1 - Cereal clusters are broken apart and transported to a filter receiver. The cereal is then returned to the process below. The air is exhausted into the atmosphere through the emission point.

Process: 073 is located at 9, Building 1 - Wet cereal flakes are conveyed to a cyclone from the flaking roll process. The flakes drop out of the system into the process below and the air is exhausted into the atmosphere through the emission point. The cyclone is used for product recovery and is part of the process.

Process: 074 is located at PENTHOUSE, Building 1 - Salt is drawn from bulk storage into a filter receiver. The salt is dropped out of the system and the air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 075 is located at PENTHOUSE, Building 1 - Bulk ingredients are drawn into a filter receiver. The ingredients then drop out of the system and the air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 077 is located at 6, Building 1 - Material is conveyed from quad cyclones to a fabric filter receiver. The fines drop out of the system and the air is exhausted into the atmosphere through the emission point.

Process: 078 is located at 6, Building 1 - Cereal is conveyed from quad cyclones to a fabric filter receiver. The fines drop out from the system and the air is exhausted into the atmosphere through the emission point.

Process: 079 is located at 7, Building 1 - Room air is pulled into the system, heated and circulated through the cereal product bed. The air then flows into a cyclone where particulates are separated out. The air is then exhausted into the atmosphere through the emission point. The cyclone is used for product recovery and is part of the process.

Process: 080 is located at 6, Building 1 - Room air is pulled into the system, heated and circulated through the cereal product bed. The air then flows into a cyclone where particulates are separated out. The air is then exhausted into the atmosphere through the emission point. The cyclone is used for product recovery and is part of the process.

Process: 081 is located at 6, Building 1 - Room or outside air is transported to the process. The air then travels across the product stream and cooling the product. The air is then exhausted into the atmosphere through the emission point.

Process: 082 is located at 6, Building 1 - Room air is heated and circulated through the product bed. The air and particulates are then exhausted into the atmosphere through the emission point.

Process: 083 is located at 6, Building 1 - Room air is circulated through the material bed. The air and particulates are then exhausted into the atmosphere through the emission point.

Process: 092 is located at 1, Building 1 - Material enters a pneumatic system and is transported to a product receiver. The material then drops out of the product receiver into the process below. The air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 093 is located at 1, Building 1 - Dust and fines are picked up from sources and transferred through product receiver into the system. The product drops out of the system and the air is exhausted into the atmosphere through the emission point.

Process: 097 is located at 7, Building 1 - The exhaust from four (4) wet flake systems is collected in a fabric filter receiver. Particles drop out of the receiver into the process while the air is exhausted into the atmosphere. The collector is part of the process.

Process: 098 is located at 10, Building 1 - Cereal dust and/or product enter the pneumatic stream and are transferred up and through a reverse jet receiver. Cereal dust and/or product drops out and the air is exhausted into the atmosphere through the emission point.

Process: 101 is located at 9, Building 1 - Air and pellet fines enter the system at five (5) points and are pneumatically conveyed to a filter receiver. The pellets drop out and are discharged into a bin. The air is



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

then exhausted into the atmosphere through the emission point. The collector is part of the process. Process: 131 is located at 9, Building 1 - Heated air is used to dry pellets from the die orifice. The air is then exhausted into the atmosphere through the emission point.

Emission unit U0000P - This emission unit consists of multiple emission points in which food ingredients are processed into consumer cereals. Product recovery systems (bag houses and cyclones) are used and add product back into the process. Exhaust from these systems emit PM and PM-10 into the atmosphere. Emission Unit U-0000P consists of fifty-eight emission points as follows: Eighteen uncontrolled: 0001P, 00007, 00015, 00029, 00036, 00037, 00038, 00039, 00042, 00046, 0036A, 0036B, 0036C, 0037A, 0046A, 00135, 00143 and 00146; Twenty-three with control equipment as part of the process: 00031, 00032, 00033, 00034, 00035, 00040, 00056, 00057, 00058, 00059, 00060, 00062, 00064, 00087, 00099, 00100, 00111, 00112, 00124, 00125, 00129, 00144 and 00145; Seventeen with control equipment for ambient air: 00047, 00048, 00054, 00055, 00065, 00090, 00091, 00105, 00106, 00107, 00113, 00114, 00118, 00119, 00123, 00141 and 00142. Flavorings added to cereal products in processes contained in this emission unit generate volatile organic compounds (VOCs), which are emitted to the atmosphere through several emission points. The application of pesticides for pest management at the Cereal Plant generates fugitive emissions of VOCs and hazardous air pollutants (HAPs). Products of combustion including NO_x, SO₂, CO, VOCs, HAPs, PM and PM-10 are emitted to the atmosphere from exempt natural gas fired process heaters, from integrated pest management using heat and other combustion sources. Other exempt activities also contribute to this unit's VOC emissions including graphic art activities associated with the packaging of consumer cereal products (example; printing of production dates on boxes), surface coating and other related activities. Trivial maintenance and construction related activities also generate emissions of VOCs.

Emission unit U0000P is associated with the following emission points (EP):

00007, 00015, 0001P, 00029, 00031, 00032, 00033, 00034, 00035, 00036, 00037, 00038, 00039, 00040, 00042, 00046, 00047, 00048, 00054, 00055, 00056, 00057, 00058, 00059, 00060, 00062, 00064, 00065, 00087, 00090, 00091, 00099, 00100, 00105, 00106, 00107, 00111, 00112, 00113, 00114, 00118, 00119, 00123, 00124, 00125, 00129, 00135, 00141, 00142, 00143, 00144, 00145, 00146, 0036A, 0036B, 0036C, 0037A, 0046A

Process: 007 is located at 7, Building 1 - Cereal pellets enter a dryer via a belt conveyor. Radiant heaters (steam) dry the moist pellets. The pellets then drop out to the process below.

Process: 015 is located at 6, Building 1 - Cereal half product, on a belt, enters the dryer. Air, heated by steam coils, is circulated above the cereal and exhausted into the atmosphere through the emission point. The cereal then falls off the end of the belt into the process below.

Process: 01P is located at 7, Building 1 - Cereal pellets enter the dryer. Air, heated by steam coils, circulates around the product. The cereal pellets drop to the process below and the air is exhausted to the atmosphere through the emission point.

Process: 029 is located at 6, Building 1 - Cereal, on a belt, enters a dryer. Air, heated by steam coils, is circulated above the cereal. The cereal drops off the belt into the process below. The air is exhausted into the atmosphere through the emission point.

Process: 031 is located at 9 & PENTHOUSE, Building 1 - Cereal and air enter a pneumatic conveying system. The product is then conveyed to a cyclone. The product then drops out of the cyclone to the process below. The air then exhausts to the atmosphere through the emission point. The cyclone is part of the process.

Process: 032 is located at 9 & PENTHOUSE, Building 1 - Cereal and ambient air enters a pneumatic conveying system. The product is then conveyed into a cyclone. The product then drops out of the cyclone to the process below. Air is then exhausted to the atmosphere through the emission point. The cyclone is



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

part of the process.

Process: 033 is located at 9 & PENTHOUSE - Cereal and ambient air enters pneumatic conveying system. Product is conveyed to the cyclone. Product drops out of the cyclone to the process below. Air exhausts to the atmosphere through the emission point. The cyclone is part of the process.

Process: 034 is located at 9 & PENTHOUSE, Building 1 - Cereal and air enter a pneumatic conveying system. The product is conveyed to the cyclone. Product then drops out of the cyclone to the process below. The air exhausts into the atmosphere through the emission point.

Process: 035 is located at 9 & PENTHOUSE, Building 1 - Cereal and air enter a pneumatic conveying system. The product is then conveyed to a cyclone. The product drops out of the cyclone to the process below. The air exhausts into the atmosphere through the emission point.

Process: 036 is located at 6, Building 1 - Cereal, on a belt, enters a dryer. Air is circulated above the product and the cereal drops off the belt to the process below. The air is then exhausted into the atmosphere through the emission point.

Process: 037 is located at 7, Building 1 - Cereal enters into a dryer on a belt. Air that is heated by steam boils is circulated above the cereal and is exhausted out the emission point. The cereal then drops off the end of the belt to the next processing operation.

Process: 038 is located at 8, Building 1 - Pellets and air enter one end of the dryer. At the other end, pellets drop out the bottom to the process below. During this drying process, air is drawn across the pellets and then exhausted into the atmosphere through the emission point.

Process: 039 is located at 8, Building 1 - Pellets and air enter one end of a Huhn dryer. On the other end, pellets drop out to the process below. Air is drawn across the pellets and exits into the atmosphere through the emission point.

Process: 040 is located at 9, Building 1 - Material is conveyed from a bulk bin through a pneumatic system. The material enters a fabric filter receiver and exits to the process below. The air is then exhausted to the atmosphere through the emission point. The fabric filter is part of the process.

Process: 042 is located at 7, Building 1 - Pellets, on a belt, enter a dryer. Air heated by steam coils enters and circulates with the pellets. The pellets drop off the end of the belt to the process below and the air is exhausted into the atmosphere through the emission point.

Process: 046 is located at 7, Building 1 - Pellets, on a belt, enter into a dryer. The air, heated by steam coils, is circulated above the pellets. The pellets drop off the end of the belt into the process below. The air is then exhausted to the atmosphere through the emission point.

Process: 047 is located at PENTHOUSE, Building 1 - Cereal and ambient air enters a pneumatic conveying system. Product is then conveyed to a filter receiver to the process below.

Process: 048 is located at PENTHOUSE, Building 1 - Cereal and ambient air enters into a pneumatic conveying system. The product then goes to a cyclone and drops out to the process below. The air is then exhausted into the atmosphere through the emission point.

Process: 054 is located at 9, Building 1 - Product ingredients and steam enter into a batching process. The product then drops to the process below and the air is exhausted into the atmosphere through the emission point.

Process: 055 is located at 8, Building 1 - Ingredients and water are fed into a cooker. Suction hoods at the inlet remove hot moist air and particulates and enters into a wet scrubber. The particulates are separated and discharged into the sanitary system and the air is exhausted into the atmosphere through the emission point.

Process: 056 is located at 9, Building 1 - Cereal pellets enter into a cyclone receiver. The cereal particles are separated from the product by cyclonic action. The cereal pellets drop out to the process below and the air is exhausted to the atmosphere through the emission point. The cyclone receiver is part of the process.

Process: 057 is located at 9, Building 1 - Cereal pellets enter into a cyclone receiver. The cereal particles are separated from the product by cyclonic action. The cereal pellets drop out to the process below and the air is exhausted to the atmosphere through the emission point. The cyclone receiver is part of the process.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

Process: 058 is located at 9, Building 1 - Cereal pellets enter into a cyclone receiver. The cereal particles are separated from the product by cyclonic action. The cereal pellets drop out to the process below and the air is exhausted to the atmosphere through the emission point. The cyclone receiver is part of the process.

Process: 059 is located at 9, Building 1 - Cereal pellets enter into a cyclone receiver. The cereal particles are separated from the product by cyclonic action. The cereal pellets drop out to the process below and the air is exhausted to the atmosphere through the emission point. The cyclone receiver is part of the process.

Process: 060 is located at 9, Building 1 - Cereal pellets enter into a cyclone receiver. The cereal particles are separated from the product by cyclonic action. The cereal pellets drop out to the process below and the air is exhausted to the atmosphere through the emission point. The cyclone receiver is part of the process.

Process: 062 is located at ROOF, Building 1 - Cereal and air enter into a pneumatic conveying system. The product is then conveyed to a product receiver and the air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 064 is located at 10, Building 1 - Cereal pellets and ambient air enter a pneumatic conveying system. The pellets are conveyed to a dust collector that discharges into a process bulk bin. The air then exhausts into the atmosphere through the emission point. The collector is part of the process.

Process: 065 is located at 9, Building 1 - Cereal and ambient air enter a pneumatic conveying system. Product is conveyed to a dust collector that discharges into a process bulk bin. The air exhausts into the atmosphere through the emission point.

Process: 087 is located at 9, Building 1 - Material is conveyed from the bulk house up to a filter receiver. The product drops through the system. The air is exhausted into the atmosphere through the emission point. The fabric filter is part of the process.

Process: 090 is located at 6, Building 1 - Hot moist air is drawn off a kettle into a wet scrubber collector. The particles are washed into the sanitary system and the air is exhausted into the atmosphere through the emission point.

Process: 091 is located at 1, Building 1 - Cereal dust is picked up and transferred up and through a reverse jet collector. The dust is bagged off and the air is exhausted into the atmosphere through the emission point.

Process: 099 is located at Building 1 - Product enters the pneumatic stream and is transferred to and through a fabric filter receiver. The product drops out and the air is exhausted into the atmosphere through the emission point. The fabric filter is part of the process.

Process: 100 is located at Building 1 - Ground cereal enters a pneumatic system and is transferred to a reverse jet collector. The cereal is dropped to the process below and the air is exhausted to the atmosphere through the emission point. The collector is part of the process.

Process: 105 is located at 8, Building 1 - Cereal pellets are conveyed to a cyclone and dropped through an aspirator. Dust and small pellets are removed from the product and discharged into the process below. The air exhausts into the atmosphere through the emission point.

Process: 106 is located at 8, Building 1 - Cereal pellets are conveyed to a cyclone and drop through an aspirator. Dust and small pellets are removed from the product and discharge into a cyclone. Fines drop into a hopper and the air exhausts through the emission point.

Process: 107 is located at Building 1 - Product enters a pneumatic system and is conveyed to a dust collector. The product then enters a storage bin and the air is exhausted into the atmosphere through the emission point.

Process: 111 is located at PENTHOUSE, Building 1 - Pellets are conveyed to a fabric filter receiver. The pellets drop out of the collector into the process. The remaining particulates are exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 112 is located at PENTHOUSE, Building 1 - Pellets are conveyed to a reverse jet collector. The



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

pellets drop out of the collector and into the process. The remaining particulates are exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 113 is located at PENTHOUSE, Building 1 - Pellets are conveyed to a reverse jet collector. The pellets drop out of the collector into the process. The remaining particulates are exhausted into the atmosphere through the emission point.

Process: 114 is located at 9, Building 1 - Grain based ingredient air is conveyed from bulk storage to a filter receiver. The ingredient falls into a use bin and then into the process. Transport air is exhausted through the fabric filter.

Process: 118 is located at 6, Building 1 - Cereal dust and air is picked up from hoods located above various packaging equipment and conveyors. The dust is separated from the air and recycled back into the process. The air is exhausted into the atmosphere through the emission point.

Process: 119 is located at 6, Building 1 - Cereal dust is picked up from hoods located above various packaging equipment and conveyors. The dust, along with air, is conveyed to a fabric filter collector. The dust is separated from the air and recycled into the process. The air is exhausted into the atmosphere through the emission point.

Process: 123 is located at 10, Building 1 - Product and air is pneumatically conveyed to a filter receiver. The product is then separated and drops into a system below. The air is then exhausted to the atmosphere through the emission point.

Process: 124 is located at 10, Building 1 - Product and air is pneumatically conveyed to a filter receiver. The product is separated and drops into the system below. The air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 125 is located at 10, Building 1 - Product is pneumatically conveyed to a filter receiver. The product is then separated and drops to the system below. The air is then exhausted into the atmosphere through the emission point. The filter is part of the process.

Process: 129 is located at 7, Building 1 - Product enters a cyclone separator. The product drops out and the air is exhausted into the atmosphere. The cyclone is part of the process.

Process: 135 is located at 8, Building 1 - The blower draws air across two (2) product conveyors to remove moisture. The air is then exhausted to the outside atmosphere.

Process: 141 is located at Floor 6, Building 1 - This process consists of a dryer classifier and air handling equipment. Particulate emissions from this process are controlled by a wet collector. Air flows through the process, then through the wet collector, discharging the cleaned air through the emission point to the outside atmosphere.

Process: 142 is located at 9, Building 1 - Air and moisture with potential particulates are picked up from 3 product inspection pans. The air and particulates are conveyed through duct work to a filtration system. The air is then exhausted into the atmosphere through the emission point.

Process: 143 is located at 8th Floor, Building 1 - Air and moisture with potential particulates are picked up from a rotary serving a product surface drying device (triplet rotary dryers). The air and particulates are conveyed through duct work to a wall exhaust point where it exits into the atmosphere.

Process: 144 is located at 9th Floor, Building 1 - Air and moisture with potential particulates are picked up from a cyclone serving a product forming device. The air and particulates are conveyed through duct work to a wall exhaust point where it exits into the atmosphere. The cyclone is part of the process.

Process: 145 is located at 10th Floor Penthouse, Building 1 - Air, moisture and product with potential particulates are picked up and conveyed to a cyclone. The air and particulates are conveyed through duct



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

work to a wall exhaust point where it exits into the atmosphere. The cyclone is part of the process.

Process: 146 is located at 7th Floor, Building 1 - Air, moisture and product with potential particulates are picked up and conveyed to Dryer. The air and particulates are conveyed through duct work to a wall exhaust point where it exits into the atmosphere.

Process: 36A is located at 6, Building 1 - Cereal, on a belt, enters a dryer. The air, heated by steam coils, is circulated above the cereal. The cereal then drops off the end of the belt and into the process below. The air is then exhausted into the atmosphere through the emission point.

Process: 36B is located at 6, Building 1 - Cereal, on a belt, enters into a dryer. The air is then heated, by steam coils, and is circulated around the cereal. The cereal then drops off the end of the belt into the process below. The air is then exhausted into the atmosphere through the emission point.

Process: 36C is located at Cereal Plant, Building 1 - Cereal, on a belt, enters a dryer. The air, heated by steam coils, is circulated above the cereal. The cereal then drops off the end of the belt and into the process below. The air is exhausted into the atmosphere through the emission point.

Process: 37A is located at 7, Building 1 - Cereal enters the dryer on a belt. The air, heated by steam coils, is circulated above the cereal. The cereal then drops off the end of the belt and enters into the next processing operation.

Process: 46A is located at Building 1 - Pellets, on a belt, enter into a dryer. The air, heated by steam coils, is circulated above the pellets. The pellets drop off the end of the belt into the process below. The air is then exhausted to the atmosphere through the emission point.

Emission unit U0000K - This emission unit consists of multiple emission points in which processed cereal is packaged and readied for distribution. Product recovery systems (bag houses, collectors) are used and add product back into the process. Emission Unit U-0000K consists of the following emission points: 00094, 00104, 00108, 00116, 00117, 136, 137, 138, 140 and 149. Exempt activities include thermal packaging operations and maintenance activities.

Emission unit U0000K is associated with the following emission points (EP):

00094, 00104, 00108, 00116, 00117, 00136, 00137, 00138, 00140, 00149

Process: 094 is located at 5, Building 1 - Cereal dust is conveyed from various pick up points on the cereal line to a reverse jet receiver. The cereal dust drops out into another collection system while the air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 104 is located at 6, Building 1 - Cereal dust is collected from the packaging scale at various locations. The dust is conveyed to a hopper and the air is exhausted through the emission point. The collector is part of the process.

Process: 108 is located at 5, Building 1 - Cereal dust is picked up from various conveyors and transported to a reverse jet receiver. The dust drops into a hopper and the air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 116 is located at 6, Building 1 - Cereal dust and air is picked up from hoods located above various packaging equipment and conveyors. The dust and air is conveyed to a fabric filter collector. The dust is separated and recycled back to the process. The air is exhausted into the atmosphere through the emission point. The collector is part of the process.

Process: 117 is located at 6, Building 1 - Cereal dust and air is picked up from hoods located above various packaging equipment and conveyors. The dust and air is conveyed to a fabric filter collector. The dust is separated and recycled back to the process. The air is exhausted into the atmosphere through the emission point. The collector is part of the process.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

Process: 136 is located at 4, Building 1 - Air and particulates are picked up from three (3) laser coders. The air and particulates are conveyed through a system of duct work to a filtration system. The air is then exhausted into the atmosphere through the emission point.

Process: 137 is located at 4, Building 1 - Air and particulates are picked up from three (3) laser coders. The air and particulates are conveyed through a system of duct work to a filtration system. The air is then exhausted into the atmosphere through the emission point.

Process: 138 is located at 4, Building 1 - Air and particulates are picked up from three (3) laser coders. The air and particulates are conveyed through a system of duct work to a filtration system. The air is then exhausted into the atmosphere through the emission point.

Process: 140 is located at 1, Building 1 - This is a packaging line with one (1) laser coder. Air and particulates are picked up from the laser coder and conveyed through duct work to a filtration system. The air is then exhausted into the atmosphere through the emission point.

Process: 149 is located at 4, Building 1 - This is a vacuum system with a baghouse to remove air and trace dust from cereal product bags just prior to sealing them. The air is then exhausted to the atmosphere through the emission point. The baghouse is considered part of the process.

Emission unit U0000B - This emission unit consists of multiple emission points in which bulk ingredients are unloaded, or loaded into storage bins. Product recovery systems (bag houses) are used and add product back into the process. Exhaust from these systems emits PM and PM10 into the atmosphere. Emission Unit U-0000B consists of the following emission points: 00012, 00028, 00049, 00088, 00095, and 00096.

Emission unit U0000B is associated with the following emission points (EP):
00012, 00028, 00049, 00088, 00095, 00096

Process: 012 is located at 9 & 10, Building 55 - This is a pneumatic suction conveying system that unloads railroad cars and conveys the material to a collector receiver which bulks the product for storage. The air from this emission point is exhausted into the atmosphere. The collector is part of the process.

Process: 028 is located at 8 BULKHOUSE, Building 55 - This is a pneumatic system that unloads railroad cars and conveys the material to a dust collector. The material drops out to the process below and the air is exhausted to the atmosphere through the emission point. The collector is part of the process.

Process: 049 is located at 9, Building 55 - This is a pneumatic suction system used to unload railroad cars. The material is conveyed to a collector/receiver where the product is discharged to the process below. The air is then exhausted into the atmosphere. The collector is part of the process.

Process: 088 is located at BULKHOUSE, Building 55 - This process is a pneumatic suction conveying system for unloading railroad cars. The material is conveyed to a collector/receiver where the material drops out of the system into storage bins. The remaining air is exhausted into the atmosphere. The collector is part of the process.

Process: 095 is located at 2, Building 55 - Cereal is pneumatically picked up at the load-out hopper and transferred up and through a reverse jet receiver. The cereal is recycled back into the system. The remaining air is exhausted into the atmosphere. The collector is part of the process.

Process: 096 is located at ROOF, Building 55 - This process conveys product to a filter receiver. The material drops out of the system into storage bins. The remaining air is exhausted into the atmosphere. The collector is part of the process.

Title V/Major Source Status

GENERAL MILLS OPERATIONS LLC 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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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 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). By accepting these federally enforceable CAPs, General Mills avoids the requirements of Subpart DDDDD - Industrial, Commercial and Institutional Boilers and Process Heaters and Subpart YYYY- 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	NO
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)



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
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
3-02-040-01	FOOD AND AGRICULTURE FOOD AND AGRICULTURE - CEREAL Dryer
3-02-999-98	FOOD AND AGRICULTURE FOOD AND AGRICULTURE - OTHER NOT SPECIFIED Other Not Classified
3-02-999-99	FOOD AND AGRICULTURE FOOD AND AGRICULTURE - OTHER NOT SPECIFIED Other Not Classified

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service 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	Range
		lbs/yr	
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	



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

0NY075-00-0	PARTICULATES		>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10		>= 250 tpy but < 75,000 tpy
007446-09-5	SULFUR DIOXIDE	334000	
0NY998-00-0	VOC	98000	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 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 - 6 NYCRR 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 6 NYCRR 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.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

- 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 - 6 NYCRR 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 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;



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

- 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,



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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	ECL 19-0301	36	Powers and Duties of the Department with respect to air pollution control
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	False Statement.
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	1 -2	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	12	Exempt Activities -



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

FACILITY	6NYCRR 201-3.2(c)(6)	23	Proof of eligibility Exempt Activities - emergency power generating units
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	24, 34, 35	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2, 3 -1	General conditions
FACILITY	6NYCRR 201-6.5(a)(8)	15	Fees
FACILITY	6NYCRR 201-6.5(c)	3	General conditions
			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	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	25	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(1)	26	Alternate operating scenarios
FACILITY	6NYCRR 201-6.5(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	27	Permit shield
FACILITY	6NYCRR 201-7	28, 29	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18, 2 -2	Required emissions tests.
FACILITY	6NYCRR 202-2.1	6	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	3 -2	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	3 -3	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212	30	General Process Emission Sources
FACILITY	6NYCRR 212.10	29	NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.3(b)	31	General Process Emission Sources - emissions from existing emission sources
FACILITY	6NYCRR 212.4(c)	1 -1	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	33	General Process Emission Sources -



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

			opacity of emissions
			limited
FACILITY	6NYCRR 215	8	Open Fires
FACILITY	6NYCRR 215.2	2 -1	Open Fires - Prohibitions

Applicability Discussion:

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

ECL 19-0301

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.

6 NYCRR 200.6

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

6 NYCRR 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

6 NYCRR 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.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 201-6.5 (e)



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 202-2.1

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

6 NYCRR 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.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR Part 215

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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:

6 NYCRR 200.3

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

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 211.1

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 212.10

Facilities that have a potential to emit (PTE) volatile organic compounds (VOCs) and/or oxides of nitrogen (NOx) that exceeds the major source threshold must either comply with the reasonably available control technology (RACT) requirements of this section or limit the annual potential to emit below the applicability level for for these contaminants.

6 NYCRR 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.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

6 NYCRR 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.

6 NYCRR 212.6 (a)

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

6 NYCRR Part 212

This regulation applies to general process emission sources of particulates and volatile organic compounds, specifying the degree of cleaning required for gases and liquid/solid particulate emissions, based on the environmental rating of the contaminant.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is 49 tons per year of volatile organic compounds set to avoid the requirements of 6NYCRR212.10, VOC RACT.

Compliance Certification

Summary of monitoring activities at GENERAL MILLS OPERATIONS LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	23	work practice involving specific operations
FACILITY	5	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
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	1-1	monitoring of process or control device parameters as surrogate
FACILITY	33	monitoring of process or control device parameters as surrogate

Basis for Monitoring

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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

Applicable Federal Requirement 6NYCRR 202-2.1:

Each year, by April 15th , all title V facilities must submit an annual emission statement to the Department. As a title V facility, General Mills must submit this report, which lists the pollutants with the quantity emitted during the previous calendar year.

Applicable Federal Requirement 6NYCRR 201-6.5(c)(3)(ii):

The requirements specified in this condition reflect the requirements of 40CFR70 Operating Permit Program, Subpart 70.6 for title V facility permits. General Mills must submit semiannual reports, certified by a responsible official, identifying any deviations from the requirements specified in their title V permit. Reports for excess emissions of HAPs that continue for more than one hour and excess emissions of regulated air pollutants that continue for more than two hours, must be submitted within 24 and 48 hours, respectively. Semi annual reports must also include the results of emission testing conducted during the previous six months.

Applicable Federal Requirement 6NYCRR 201-6.5(e):

The requirements specified in this condition reflect the requirements of 40CFR70 Operating Permit Program, Subpart 70.6 for title V facility permits. In accordance with this requirement, General Mills must submit an annual compliance certification report that lists each condition of the permit that is the basis for the certification , indicating compliance status, whether compliance was intermittent or continuous, the method used to determine compliance and any additional information required to verify compliance if necessary.

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

General Mills operates one (1) diesel fired emergency water pump to supply the Cereal Plant's fire suppression system in the event of a fire. This engine is considered an exempt source if utilized for emergencies only, including times when additional water supply is needed to combat fires. As proof of exempt eligibility for the emergency water pump, the facility must maintain monthly records which demonstrate that the engine is operated less than 500 hours per year, on a 12-month rolling total basis. Hours of operation are recorded using an hour counter and 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 water pump 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 must be kept on-site for five years and must be readily available to NYSDEC representatives upon request.

Applicable Federal Requirement 6NYCRR 201-6.5 (f)(1):

The requirements specified in this condition reflect the requirements of 40CFR70 Operating Permit Program, Subpart 70.7 for title V facility permits. In accordance with 6NYCRR201-6.5(f)(1), this title V permit includes a monitoring condition specifying operational flexibility at the Cereal 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 modification and/or



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

replacement of equipment, handling and or cleaning devices consistent with the system listed or with equivalent equipment. General Mills may change or modify process rates or modify existing processes provided the emissions from the modified control device are equal to or less than the source being modified or replaced and 6NYCRR231-2 (New Source Review (NSR)) and/or 40CFR52.21 (Prevention of deterioration of air quality (PSD)) or any other new requirement(s) is/are not applicable. The details of any modification made, such as increases in production rate, changes in the efficiency of control equipment, and NSR/PSD nonapplicability determination shall be submitted to the Department for review 30 days prior to the commencement of construction.

Applicable State Requirement 6NYCRR 201-7:

General Mills is required to track the purchase and use of VOC containing materials on a monthly basis, to verify compliance with the CAP on facility-wide VOC emissions, set in 1995 to avoid the requirements of 6NYCRR212.10, Reasonably available control technology (RACT) for major facilities. The annual rolling total, determined by summing the individual monthly VOC emissions during any consecutive 12-month period, must be compared to the limit of 49 tpy. If VOC emissions exceed this limit, General Mills will be considered in violation of their VOC RACT CAP. Any exceedance must be reported to the Department within 30 days. If General Mills is unable to comply with the emissions CAP they will be subject to the requirements of 6NYCRR212.10. Annual reporting is required. Records must be maintained on-site for five years and must be available for review by the Department or USEPA upon request.

Applicable Federal Requirement 6NYCRR 212:

General Mills is required to implement certain monitoring, maintenance and record keeping requirements to maintain optimum overall removal efficiencies for the fabric filters throughout the cereal plant. This is necessary to comply with the 0.15 gr/dscf particulate concentration limit specified in 6NYCRR212.3(b) and the 0.050 gr/dscf particulate concentration limit specified in 6NYCRR212.4(c). General Mills developed a Preventative Maintenance Plan for the maintenance of the filters which includes weekly or monthly uptime inspections and semiannual downtime inspections. Records of maintenance and monitoring must be maintained on-site for five years.

Applicable Federal Requirement 6NYCRR 212.3(b):

General Mills must operate their cereal plant 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 detectors 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 cereal plant in accordance with the requirements specified in this condition to comply with the 0.050 gr/dscf particulate concentration limit specified in



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1402-00565/00179

Renewal Number: 1

Modification Number: 3 05/11/2011

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 and manufacturer's specifications. 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 detectors 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 212.6(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 Cereal 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.