

Shrinking our compliance footprint
into thin air.....

SaraLee



The Republic of California

- **San Luis Obispo – Consolidated 3 facilities: San Luis @ Sueldo st, Redding, CA and San Luis @ Long St.**
 - Took a net emissions/ production decrease from the air district in order to consolidate.
 - After consolidation, we proposed source testing to verify calculated emission factors.
 - Any growth at the consolidated facility would have originally required control technology under original emission factors
 - Technology was untested for these type of ovens. Did not want to establish BACT.
 - Air district said we would have to install control technology if we wanted to increase over increased emission limits under new source review (NSR).
 - Successfully lowered emission factors (by half) and literally doubled production (25 more people hired.)
 - Had to do two rounds of testing but proved calculated emissions were much higher than actuals.

California

Sacramento

- One boiler older than the other
- Boiler specific run hour limits in operating permit (2 boilers)
- Facility deemed it reasonable to operate one boiler full time with the other as a lag
- While sending in annual emissions inventories realized we had exceeded our run hours significantly
- Reported per the permit
- Received a \$40k fine
- Also had to change the boilers to low NOx in the same time period

California....Continued

Fresno, CA (San Joaquin Valley Air district)

- Originally Title V.
- Asked all facilities to look at all compliance requirements and evaluate where they thought they could manage themselves out of requirements.
- Managed to keep total actual emissions well below PTE for several years.
- Applied and received Synthetic minor permit reducing compliance requirements/ time by approximately 40%
- Had production line specific limits which all go to a catalytic oxidizer. Negotiated facility limits instead of line specific limits
- Currently working on energy savings projects the air district and Pacific Gas and Electric (PG&E).

Yep Still California....South Coast Air District

Vernon (South L.A.)

- Permit application on hold for three years
- Wrong emission factor used in application put us into Title V.
- Spent considerable time trying to reconcile with the air district.
- In the midst of correcting the original application we wanted to do an expansion with new equipment.
- New equipment triggered New Source review and low NOx requirements (30 ppm)

Pennsylvania

Northumberland

- Expanded a facility
- Regional supervisor proposed a higher destruction efficiency than BAT on an oxidizer (98% vs. national of 95%).
- Concerned new destruction requirement would set precedence nationally and become the new BAT with respective increased cost.
- Met with and went to the State office to get it lowered. Difficult but cited other permits issued in the state not as stringent, economic burden and increased NOx emissions from running oxidizer hotter.

Sunbury

- Same type of facility. Sent in new permit application.
- Same result again. Regional supervisor agenda.
- Will go down the same path.
- We started application much earlier this time and have time to fight it.

Minnesota

Roseville

- EPA questioned the efficacy of the Alternative Control Technique (ACT) document which has been used since 1992 in the baking industry as an AP-42 guidance document.
- Due to EPA not having original source testing results from original tests an incorrect assumption had been made. A 1.6 emission correction factor was recently suggested by EPA because propane was used as a calibration gas vs. ethanol.
- Have since petitioned the American Bakers association (ABA) members to find original source test documents. One member had the data several thousand pages.
- Submitted to EPA. Preliminary response is they are going to “re-accept” original ACT
- Risk of not questioning this could have set precedence nationally.

Wisconsin

Madison

- Compliance calendar was set up for the plant to check specific permit items each month including air permit limits on production.
- Plant manager called E&S staff concerned that the plant was getting close to some monthly limits on specific production lines.
- Verified emission factors and calculations indeed they were.
- Contacted the agency to ask them what the best way was to get a facility wide limit vs. line specific. Authorization to construct, permit modification, application addendum etc? Permit modification.
- Agency worked with us to expedite within 30 days plus the 30 day state and 15 day EPA public notice period. Had to shift production for approximately 30 days but did not go out of compliance.
- Historic good compliance record helped.

Kentucky

Claryville, KY

- Received a violation from the State
- New subdivision next to plant
- Contested the violation
- Dug into the details of method 9 and determined we could back out steam opacity from our smokers

Owensboro, KY

- Had method 9 opacity requirements listed in air permit. Plant was doing visual checks but got opacity method 9 taken off of permit.
- Used the argument that natural gas was the only fuel and no historical issues

Success in negotiating air permits

- Know your permit requirements.
- Make sure your plant(s) know your permit requirements and a system is set up as a reminder
- Know which factors give you the most risk (frequency, severity and most likely to have trouble with (line specific limits)).
- Know how your emission factors are derived
- If you don't know, know someone who does
- Always have the right to do engineering testing to find/ question true emission data
- Best way to comply with permit requirements is not have as many permit requirements
- Face to face meeting with agencies always a good tool if simple correspondence does not work.