STATEMENT OF BASIS

Title V Air Operation Permit Renewal
DRAFT Permit No.: 0310004-018-AV
Renewal of Title V Air Operation Permit No.: 0310004-016-AV

APPLICANT

The applicant for this project is Kraft Foods Global, Inc., Maxwell House Coffee. The applicant's responsible official and mailing address are: Mr. Joe Waryold, Plant Manager, Kraft Foods Global, Inc., Maxwell House Coffee, 735 E. Bay Street, Jacksonville, FL 32202.

FACILITY DESCRIPTION

This facility produces roasted coffee with batch and continuous roasters. The facility consists essentially of material handling, cleaning, roasting, cooling, grinding, and packaging operations.

PROJECT DESCRIPTION

This permit is to renew Title V Air Operation Permit No. 0310004-016-AV and to incorporate the terms and conditions of Air Construction Permit No. 0310004-017-AC (Emission Unit (EU) No. 541 was eliminated from the permit and Emission Unit No. 529 was modified and now includes former EU No. 541). Specific Condition No. 11 was eliminated from EU Nos. 503, 504, and 506, and Specific Condition No. 12 was eliminated from EU No. 509. Additionally, there were changes made to Emission Unit No. 530, and Emission Unit No. 531 is now listed as an insignificant emission unit. Also, Emission Unit Nos. 505, 520, 521, 522, 523, 541, 553 and 554 have been removed from the plant, and subsequently eliminated from the permit.

RELATED DOCUMENTS

Title V Air Operation Permit Renewal Application received June 28, 2012
Title V Air Operation Permit No. 0310004-016-AV
Air Construction Permit No. 0310004-017-AC
Letter from Mr. George Whitmer, Whitmer Environmental Services, Inc., requesting the deletion of specific conditions regarding recordkeeping and reporting received July 16, 2012
Letter from Mr. George Whitmer, Whitmer Environmental Services, Inc., requesting a permit determination received May 31, 2012
Electronic mail correspondence from Mr. George Whitmer, Whitmer Environmental Services, Inc., regarding the removal of emission units from the Maxwell House Coffee Plant, received August 24, 2012

PRIMARY REGULATORY REQUIREMENTS

This facility is a major source of air pollution for Title V purposes because the potential emissions of at least one regulated criteria air pollutant is greater than 100 tons per year pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

Based upon the Title V air operation permit renewal application received June 28, 2012, this facility is not a major source of HAPs.

STATEMENT OF BASIS

PROJECT REVIEW

This permit is to renew Title V Air Operation Permit No. 0310004-016-AV and to incorporate the terms and conditions of Air Construction Permit No. 0310004-017-AC (Emission Unit No. 541 was eliminated from the permit and Emission Unit No. 529 was modified and now includes former EU No. 541). Specific Condition No. 11 was eliminated from EU Nos. 503, 504, and 506, and Specific Condition No. 12 was eliminated from EU No. 509. Additionally, there were changes made to Emission Unit No. 530, and Emission Unit No. 531 is now listed as an insignificant emission unit. Also, Emission Unit Nos. 505, 520, 521, 522, 523, 541, 553 and 554 have been removed from the plant, and subsequently eliminated from the permit.

The following changes from Air Construction Permit No. 0310004-017-AC were incorporated:

1. Emission Unit No. 541 eliminated
2. Emission Unit No. 529 was modified, now includes former EU No. 541.

The following changes were made per request in letter from Mr. George Whitmer, Whitmer Environmental Services, Inc., dated July 16, 2012:

Specific Condition No. 11 was eliminated from EU Nos. 503, 504, and 506, and Specific Condition No. 12 was eliminated from EU No. 509.

The specific condition that was eliminated was as follows:

<u>Recordkeeping and Reporting Requirements</u>

A record shall be maintained of all periods that the afterburners are shutdown during the operation of the coffee roasters. These records shall contain sufficient information to calculate uncontrolled emissions during the shutdown and shall be a part of the monthly recordkeeping requirements.
[Rule 62-210.700(6), FAC, and Rule 2.301, JEPB]

The following changes were made per request in permit determination letter dated May 31, 2012:

Emission Unit No. 530 – The name of the emission unit has changed from SIG-VAC Packaging Machines to Gevalia Packaging Machines. Additionally, the maximum process rate was changed from 12,600 pounds per hour (lbs/hr) to 3,400 lbs/hr. The nominal volumetric flow rate was changed from 5,000 cubic feet per minute (cfm) to 500 cfm.

This emissions unit previously had two operational baghouses. Two sources of emissions will be routed to EU 530 – Emissions from the SIG packaging line and minor emissions from the Gevalia bean process line. The Gevalia line is delicate and requires a mechanical conveying system.

Emission Unit No. 531 was eliminated from the permit. This EU has two baghouses, both of which now emit to the inside of a building. Therefore, there are no emissions to the atmosphere. Consequently, this emission unit is now considered an insignificant emission unit.

CONCLUSION

This project renews Title V Air Operation Permit No. 0310004-016-AV, which was issued on February 19, 2008. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213and 214. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawing(s), plans, and other documents on file with the Permitting Authority.

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