

## AIR PERMIT REVIEW

APPLICANT		SITE LOCATION		COUNTY
Campbell Soup Supply Company		Maxton		Robeson
CONTACT		PHONE		
Lorraine Sampson (Campbell)		(910) 844-1378		
David Keen (consultant)		(919) 845-1422		
APPLICATION FOR PSD			Existing P/N 04090T19	
APP No.	REVIEWER	SIGNATURE	DATE	
7800159.04B	F. Langenbach		August 20, 2004	
RECOMMENDATION and COMMENT			FEE CLASS	
Issue Permit # 04090T20			Title V	
CDS Plant ID = 3715500159				

### 1. Purpose of Application

On April 23, 2004, Campbell Soup Supply Company submitted a significant permit modification [application # 7800159.04A] which will contravene or conflict with a condition in their existing permit. On July 13, 2004, Campbell Soup submitted a PSD application which was combined with their April application under application # 7800159.04B.

The April application is concerned with past permitting actions involving the steam plant. In 1981, upon start-up, the Campbell steam plant consisted of three coal/natural gas fired Johnston boilers (ID Nos. 1, 2, and 3, 51 mmBtu per hour each). In 1987, one natural gas/fuel oil fired Nebraska boiler (ID No. 4, 202 mmBtu per hour) was added to the steam plant. In 1991, the three Johnston boilers were removed and two natural gas/fuel oil fired Union and Keeler boilers (ID Nos. 5 and 6, 127 and 126 mmBtu per hour) were added. From 1991 to present, boilers (ID Nos. 4, 5, and 6) have been permitted under a SO<sub>2</sub> and NO<sub>x</sub> limit of less than 250 tons per 12 month period, and a heat input restriction of less than 250 million Btu per hour. This defined the source as PSD minor. This permitting history is detailed in a table under Section 4, Regulatory Analysis. Campbell Soup has proposed a re-permitting action which would result in boiler No. 4 being placed under a SO<sub>2</sub> and NO<sub>x</sub> limit of less than 250 tons per 12 month period. Boiler Nos. 5 and 6 would be placed under a second cap consisting of a SO<sub>2</sub> and NO<sub>x</sub> limit of less than 250 tons per 12 month period, and a heat input restriction of less than 250 million Btu per hour. This re-permitting process will be discussed in detail under Section 4, Regulatory Analysis.

In the July application, Campbell Soup has proposed the installation of 10 new cookers plus labeling equipment to support a new product line. The application is PSD since it involves the debottlenecking of the steam plant with an incremental increase of 76.8 million Btu per hour. This new line is for the production of microwavable soup cups and bowls. The cookers do not produce any emissions [insignificant activity] and the labeling equipment emits a minor amount of VOCs [13.3 tons per year]. The application addresses the applicable elements of PSD for all pollutants exceeding respective significant thresholds, including an air quality modeling demonstration, and additional impacts evaluation. Best Available Control Technology (BACT) is not applicable because the sources of significant emissions (the steam boilers) are not being physically or operationally changed.

Campbell Soup  
August 20, 2004

This application will be processed under 2Q .0501(d)(2). This will allow Campbell after a 30 day public notice and parallel EPA review to construct and operate the new cookers and labeling equipment. However, during this period, the steam plant will operate as is presently permitted. After permit issuance under 2Q .0501(d)(2), the permit will be re-noticed under 2Q .0501(d)(1) requiring a 30 day public notice followed by a 45 day EPA review period.

## 2. Facility Description

This facility is involved in the production of soup.

## 3. Application Chronology

<u>April 23, 2004</u>	Air permit application [re-permitting steam plant] was received by the Division of Air Quality, Raleigh Central Office.
<u>June 9, 2004</u>	Requested additional information in letter to Campbell Soup concerning past boiler emissions and facility modification history.
<u>July 6, 2004</u>	Received response to request for additional information.
<u>July 13, 2004</u>	Air permit application [new process line, PSD] was received by the Division of Air Quality, Raleigh Central Office.
<u>July 15, 2004</u>	Requested additional information in email to consultant requesting historical operating hours from 1987 to 1991 to evaluate past compliance with proposed 250 million Btu per hour heat input limitation.
<u>July 16, 2004</u>	Revision pages received to application of July 13, 2004.
<u>July 23, 2004</u>	Class I impact analysis received for July 13, 2004 application
<u>August 2, 2004</u>	Received response to July 15, 2004 additional information request.
<u>August 10, 2004</u>	Revised Class I Impact Analysis received.

## 4. Regulatory Analysis

### A. Steam plant re-permitting

1. Historical - The following table provides a permitting history of the steam plant from November, 1987 to April, 1991. From 1991 to the present, the three permitted boilers have been limited under one cap which limited NO<sub>x</sub> and SO<sub>2</sub> emissions to less than 250 tons per 12 month period and restricted the heat input to less than 250 million Btu per hour. On June 1, 1998, Campbell Soup sold its metal can manufacturing portion of the business to Silgan Can Company, and as a result, the VOC PSD avoidance cap was removed from Campbell's permit.

Draft

permit #	date	description	limits
4090R3	11/23/87	three coal/nat gas fired Johnston boilers [ID Nos. 1, 2, 3, 51 mmBtu per hr. each]  one nat gas fired Nebraska boiler [ID No. 4, 202 mmBtu per hr.]	1. Johnston boilers < 250 tpy SO <sub>2</sub> and NO <sub>x</sub> 2. Nebraska < 250 tpy NO <sub>x</sub> 3. Only one coal fired Johnston boiler may operate when operating Nebraska 4. VOCs less than 250 tpy from coal fired Johnston boiler plus can manuf.
4090R4	12/3/87	admin corrections only	
4090R5	3/12/90	three coal/nat gas fired Johnston boilers [ID Nos. 1, 2, 3, 51 mmBtu per hr. each]  one nat gas, Nos 2 and 6 fuel oil fired Nebraska boiler [ID No. 4, 202 mmBtu per hr.]	1. Johnston boilers < 250 tpy SO <sub>2</sub> and NO <sub>x</sub> 2. Nebraska < 40 tpy SO <sub>2</sub> and NO <sub>x</sub> 3. Only one coal fired Johnston boiler may operate when operating Nebraska 4. VOCs less than 250 tpy from coal fired Johnston boiler plus can manuf.
4090R6	3/15/90	three coal/nat gas fired Johnston boilers [ID Nos. 1, 2, 3, 51 mmBtu per hr. each]  one nat gas, Nos 2 and 6 fuel oil fired Nebraska boiler [ID No. 4, 202 mmBtu per hr.]	1. Johnston boilers < 250 tpy SO <sub>2</sub> and NO <sub>x</sub> 2. Nebraska < 40 tpy SO <sub>2</sub> and 250 tpy NO <sub>x</sub> 3. Only one coal fired Johnston boiler may operate when operating Nebraska 4. VOCs less than 250 tpy from coal fired Johnston boiler plus can manuf.
4090R7	5/2/90	no change in steam plant	
4090R8	8/1/90	modeling plan required	
4090R9	11/9/90	steam plant removed from this permit new permit # 6952	
4090R10	11/20/90	admin corrections only	
6952	1/18/91	three coal/nat gas fired Johnston boilers [ID Nos. 1, 2, 3, 51 mmBtu per hr. each]  one nat gas, Nos 2 and 6 fuel oil fired Nebraska boiler [ID No. 4, 202 mmBtu per hr.]  two nat gas, Nos. 2 and 6 fuel oil fired Union and Keeler boilers [ID Nos. 5 and 6, 127 and 126 mmBtu per hr.]	1. Annual site SO <sub>2</sub> and NO <sub>x</sub> emissions less than 250 tons 2. Annual VOC emissions less than 250 tons including all fuel burning equipment and can manuf. 3. Heat input to the boilers less than 250 million Btu per hour.

permit #	date	description	limits
6962R1	4/17/91	<p>three coal fired Johnston boilers removed</p> <p>one nat gas, Nos 2 and 6 fuel oil fired Nebraska boiler [ID No. 4, 202 mmBtu per hr.]</p> <p>two nat gas, Nos. 2 and 6 fuel oil fired Union and Keeler boilers [ID Nos. 5 and 6, 127 and 126 mmBtu per hr.]</p>	<p>1. Annual site SO<sub>2</sub> and NO<sub>x</sub> emissions less than 250 tons</p> <p>2. Annual VOC emissions less than 250 tons including all fuel burning equipment and can manuf.</p> <p>3. Heat input to the boilers less than 250 million Btu per hour.</p>

2. 1987 Proposed Re-permitting of the Steam Plant - Campbell has proposed to go back and modify the November, 1987 permitting action resulting in the issuance of permit # 4090R3. This modification was for the installation of a natural gas, Nos. 2 and 6 fuel oil fired Nebraska boiler [202 million Btu per hour]. Existing permitted units at the facility consisted of three natural gas, coal fired Johnston boilers [51 million Btu per hour each]. The resulting permit from this modification provided annual emission caps for SO<sub>2</sub> and NO<sub>x</sub> for the three Johnson boilers and a second cap for the Nebraska. This permitting action made the source PSD major.

This application would propose to re-permit this past action by placing the three Johnson and one Nebraska boilers under one annual emission cap for SO<sub>2</sub> and NO<sub>x</sub> of less than 250 tons per 12 month period plus one heat input restriction of less than 250 million Btu per hour. The heat input restriction avoids the steam plant being defined as a listed source category with a resulting 100 ton PSD threshold. This would re-permit the source as PSD minor. Implementing this re-permitting action would require that the facility demonstrate historically that the combined actual emissions from these four boilers were less than 250 tons of NO<sub>x</sub> and SO<sub>2</sub> on an annual basis and that they had an average combined hourly heat input rate of less than 250 million Btu per hour. The table below demonstrates that from 1987 to 1991 the actual combined annual NO<sub>x</sub> and SO<sub>2</sub> emissions from the four boilers were less than 250 tons per pollutant.

year	emissions (tons per year)							
	nitrogen oxides				sulfur dioxide			
	coal	fuel oil	nat. gas	total	coal	fuel oil	nat. gas	total
1986-87	119.46	0.00	1.82	121.28	124.51	0.00	0.01	124.52
1987-88	125.59	0.00	1.92	127.51	130.90	0.00	0.01	130.91
1988-89	12.45	1.58	34.24	48.27	12.98	8.14	0.15	21.27
1989-90	4.70	5.55	40.07	50.31	4.89	28.50	0.17	33.57
1990-91	2.01	0.03	37.48	39.52	2.10	0.16	0.16	2.42

Except for 1988-89 and 1989-90, the above emissions were based on historic boiler fuel use data and emission factors described as follows: 1) for coal, based on stack test: 8/3/84 [ $\text{NO}_x = 0.473$  lbs/mmBtu], and [ $\text{SO}_2 = 0.493$  lbs/mmBtu], 2) for fuel oil, based on stack test: 11/1/93 [ $\text{NO}_x = 0.297$  lbs/mmBtu], and [ $\text{SO}_2 = 1.53$  lbs/mmBtu], and 3) for natural gas, based on AP-42; 7/98. For 1988-89 and 1989-90, emissions were obtained from Campbell quarterly reporting of actual emissions to DAQ.

In attempting to document compliance with the heat input limitation of less than 250 million Btu per hour from 1987 to 1991, Campbell could not find any boiler operating hours data for this specific time period. However, starting in 1996, Campbell started recording by boiler, the fuel use by type, and the corresponding operating hours while burning that fuel. During 1996, the total heat input was 778,359 million Btu with an average heat input of 176 million Btu per hour. During 1997, the total heat input was 791,810 million Btu with an average heat input of 206 million Btu per hour. This compares to the following total boiler production rates during the time period in question:

1987-88: 559,000 mmBtu  
1988-89: 562,194 mmBtu  
1989-90: 641,103 mmBtu  
1990-91: 554,837 mmBtu

Given the lower total boiler production rates, one can conclude that the million Btu per hour input rates in the subject time period were likely lower than those in 1996-1997, and therefore well less than 250 mmBtu per hour.

3. 1991 Proposed Re-Permitting of the Steam Plant - Campbell has proposed to go back and modify the January, 1991 permitting action resulting in the issuance of permit # 6952. This modification was for the installation of two natural gas, Nos. 2 and 6 fuel oil fired Union and Keeler boilers [ID Nos. 5 and 6, 127 and 126 million Btu per hour]. The permit resulting from this modification provided one annual emission cap for  $\text{SO}_2$  and  $\text{NO}_x$  of less than 250 tons for the three coal/natural gas fired Johnson boilers [ID Nos. 1, 2, and 3], the natural gas, Nos. 2 and 6 fuel oil fired Nebraska boiler [ID No. 4], plus the two proposed natural gas, Nos. 2 and 6 fuel oil fired Union and Keeler boilers [ID Nos. 5 and 6]. In addition, all six of the above listed boilers were put under a combined heat input restriction of less than 250 million Btu per hour to avoid being a listed source category with a resulting 100 ton PSD threshold. This permitting action changed the source classification from PSD major to minor.

This application would propose to re-permit this past action by placing the Union and Keeler boilers under a second  $\text{SO}_2$  and  $\text{NO}_x$  cap of less than 250 tons per year and a heat input restriction for these two boilers of less than 250 million Btu per hour. The proposed 1987 re-permitting action, described above, limited the  $\text{SO}_2$  and  $\text{NO}_x$  emissions for the for the three Johnson and one Nebraska to less than 250 tons per year and restricted the combined heat input to these four boilers to less than 250 million Btu per hour. With the two resulting caps, this proposed re-permitting action would result in this source being classified as PSD major.

In April, 1991, the three Johnson boilers were shut down and removed from the permit. This action would result in a final permitting scenario of the Nebraska being under one  $\text{SO}_2$  and  $\text{NO}_x$  cap of less than 250 tons per year. The heat input restriction would be removed since the design heat input of the Nebraska is less than 250 million Btu per hour. For the Union and Keeler boilers, the emission cap and heat input restriction would remain unchanged.

Since from 1991 to present, under this re-permitting scenario, the facility would now be classified as PSD major rather than minor as is now permitted. The modifications over this period were reviewed to ensure that no past actions could have triggered PSD. The table following provides a summary of these permitting actions and their impacts and indicates no permitting actions that would have triggered PSD review.

Date	Permit #	description of modification	analysis/comments
1/15/93	04090R11	Permit issued for addition of two piece can manufacturing process: -addition of washcoat application station and oven -installation of spray station and inside bake oven -permit an existing 5,000 gallon enamel UST -permit two existing 5,000 gallon sealing compound indoor storage tanks -permit six existing bodymakers	Emissions from the new process were captured and controlled by a new recuperative thermal oxidizer. Revised PTE estimates based on subsequent testing and as reported in the Campbell initial Title V permit application are as follows: SO <sub>2</sub> : 0.06 tpy NO <sub>x</sub> : 13.0 tpy CO: 2.31 tpy PM: 1.39 tpy VOC: 98.8 tpy The Campbell facility primary activity, soup manufacturing, is a non-listed source category subject to a 250 tpy major source threshold. The D & I project involved modifications to soup manuf. equipment only, and not to the steam boilers. An enforceable 250 tpy facility-wide VOC limit was in place at the time of the project; therefore the primary source was minor with respect to PSD. The project itself did not constitute a major source in and of itself, and therefore not subject to PSD. See Page A.23 of the 1990 Draft NSR Workshop Manual for supporting policy. Can manuf. operations including those added/modified by the subject project do not require steam (other than small amounts for comfort heating). Therefore no increase in steam boiler output and associated emissions occurred as a result of the project.
5/11/95	04090R13	Permit issued for the construction and operation of a hydrated lime silo.	The PTE for this unit is 2.36 tpy of PM/PM-10. The project was a minor modification not subject to PSD.

Date	Permit #	description of modification	analysis/comments
12/20/95	04090R15	Permit issuance for: Installation of additional end press and replace two coating materials: -end sealing compound -outside spray washcoat -conversion of four existing body maker side seam machines from flow coat to air atomize and replace coating material	From the initial Title V permit application, the total VOC PTE from Emission Source ID Nos. ES-002 (can end presses and sealing operation) and ES-003 through 006 (body makers) is approximately 122 tpy. The subject project involved modifications to this subset of soup manuf. equipment only, and did not involve any changes to the fossil fuel-fired boilers. As described above, the primary source is non-listed and therefore subject to a 250 tpy major source threshold regardless of the potential applicability of an alternate threshold to the fossil fuel-fired boiler source. An enforceable 250 tpy facility wide VOC limit was in place at the time of the project; therefore the primary source was minor with respect to PSD. The project itself did not constitute a major source in and of itself, and therefore not subject to PSD. See Page A.23 of the 1990 Draft NSR Workshop Manual for supporting policy. Can manuf. operations including those added/modified by the subject project do not require steam (other than small amounts for comfort heating). Therefore no increase in steam boiler output and associated emissions occurred as a result of the project.
02/09/96		Installation of a new ultra violet (UV) oven to cure can end varnishes.	Insignificant source under Title V (<5 tpy)
04/18/97		Refurbishment of Nebraska Boiler No. 4: -replacement of steam tubes -replacement of forced air fan	This project constituted routine maintenance, repair and replacement and was as such was excluded from PSD applicability. The basis for this decision is detailed in a letter dated April 2, 2004 from Campbell Soup's consultant (RTP Environmental). In making this determination, the WEPCO model was used which weighed the nature, extent, purpose, frequency, and cost of the work, to arrive at a common sense finding.

**B. PSD Application - Batch Retort Process**

1. Background -The automated batch retort process will consist of 10 cookers and associated fillers, blenders, and closers. Soup from the existing preparation and blending operations will be pumped to a series of fillers, blenders and closers associated with the new process line. Following preparation and packaging, the containers will be processed in cookers which use hot water to cook and sterilize the soup.

2. Regulatory Analysis - There are no emissions associated with the automatic batch retort process which uses hot water to cook and sterilize soup in plastic containers. The proposed new process line is estimated to result in an increase in steam demand. The new cookers will require steam to heat water. The facility estimates the maximum steam demand from the new process to be 60,000 pounds per hour at 400 psig steam or a boiler heat input rate of 76.8 million Btu per hour. Emissions associated with this increased boiler utilization were calculated based on worst case fuel and are summarized in the following table. Emission factors used to calculate these increased emissions are from AP-42, 9/1998. It should be noted that the AP-42 emission factors used for NO<sub>x</sub> and SO<sub>2</sub> when burning No. 6 fuel oil are higher than the tested values noted under Section A2 of this review.

pollutant	emission increase pounds per hour	emission increase tons per year	PSD significant threshold [tpy]	significant increase?
PM = PM-10	12.3	53.9	15	yes
nitrogen oxides	24.07	105.44	40	yes
sulfur dioxide	114.16	500	40	yes
carbon monoxide	6.33	27.71	100	no
volatile organic compounds		15.1 = 1.81 [boilers] + 13.3 [labeling]	40	no
sulfuric acid mist	7.51	24.59	7.0	yes
lead	0.001	0.003	0.6	no

As documented above, this proposed project will result in a significant net emission increase from the boilers for PM-10, nitrogen oxides, sulfur dioxide, and sulfuric acid mist. The application addresses the applicable elements of PSD for all pollutants exceeding respective significant thresholds, including an air quality modeling demonstration, and additional impacts evaluation. Best Available Control Technology (BACT) is not applicable because the sources of significant emissions (the steam boilers) are not being physically or operationally changed.

The three boilers vent to one of two common stacks, the main stack [EP17, 213.25 feet in height] which all boilers vent to when burning fuel oil, and the Eldon stack [EP18, 50.0 feet in height] which all boilers vent to when burning natural gas. The Eldon heat exchanger takes a slip stream of stack gas to preheat feed water and only operates during the burning of natural gas. The boilers may only vent to one stack. Campbell Soup is proposing to accept an annual operating restriction of 6,000 hours per year on the Eldon stack/heat exchanger process. This limitation is needed to demonstrate compliance with the annual nitrogen oxide NAAQS.

On June 1, 1998, Campbell Soup sold its metal can manufacturing portion of the business to Silgan Can Company. Silgan is located within the property confines of Campbell Soup. The Silgan natural gas fired thermal oxidizers were included in the nitrogen oxides NAAQS evaluation.

The following table presents the modeled emission rates for both the Class II increment and NAAQS.

Modeled Source ID	Source Description	incremental emission increase			potential emissions	
		SO <sub>2</sub> [lbs/hr]	NO <sub>x</sub> [lbs/hr]	PM <sub>10</sub> [lbs/hr]	SO <sub>2</sub> [lbs/hr]	NO <sub>x</sub> [lbs/hr]
EP17	Main stack	168.9	24.1	12.3	1000.10	114.7
EP18	Eldon stack	insignificant	10.55	insignificant	insignificant	42.77

The following table presents the modeled emission rates for the modeled impact to the Class I, Cape Romain National Wildlife Refuge - 184 km south of the Campbell Soup facility.

Model ID	PM-10 incremental emission increase		sulfur dioxide incremental emission increase		nitrogen oxides incremental emission increase	
	tons/year	pounds/hour	tons/year	pounds/hour	tons/year	pounds/hour
	EP17 - Main	53.9	12.31	500	168.9	105

In summary, the results of the screening level analysis demonstrates that the proposed incremental increase in boiler emissions will result in ambient impacts in excess of Class II significant levels for NO<sub>x</sub> and SO<sub>2</sub> but not for PM-10. A refined air quality analysis to calculate concentrations for comparison to the NAAQS and PSD Class II increment were performed for SO<sub>2</sub> and NO<sub>x</sub> emissions. The results of the refined analysis demonstrate that the proposed modification to the Campbell Soup facility will not cause a NAAQS or increment violation. In addition, sulfuric acid mist was modeled against the acceptable ambient levels [AALs] at a potential hourly emission rate of 44.48 pounds per hour from stack ES17. The results show compliance with both hourly and 24 hour periods, with the hourly at 13 percent, and 24 hour at 15.8 percent of the AALs. This modification does not trigger North Carolina Air Toxics and is exempted under 15A NCAC 2Q .0702(a)(18), since the boilers burn only unadulterated fossil fuels. This modeling demonstration was made to show no adverse impact from the sulfuric acid mist.

In addition, the effects of the proposed modifications at the Campbell Soup plant were evaluated with respect to the Class I significant impact levels and the Air Quality Related Values at the Cape Romain National Wildlife Refuge. The emissions increase associated with the project was evaluated using the EPA recommended CALPUFF modeling system. In summary, the modeling demonstrates no significant impacts and no exceedance of either visibility or deposition thresholds.

For a detailed discussion of the air quality modeling analysis, and additional impacts evaluation, see the report prepared by Mr. Jerry Freeman of the Air Quality Analysis Section.

### C. PSD Application - Labeling System

Two new labeling lines will also be installed. The proposed new labeling system is a high speed, roll feed system that utilizes a tetrahydrofuran [THF] based adhesive to seal pre-printed polystyrene labels onto plastic bowls. Vapors from the labeling system will be captured in hooded vents and exhausted to the ambient air by an induced draft fan. Potential VOC emissions were calculated using the maximum THF feed rate to the labelers, continuous annual operation at design capacity, and assuming 100 percent evaporation to atmosphere. Potential VOC emissions are calculated at 3.04 pounds per hour and 13.3 tons

per year. As noted in Section B above, the increased VOC emissions from the boilers plus the labeling system equals 15.1 tons per year which is below the PSD threshold for this pollutant.

THF is not a listed North Carolina Toxic Air Pollutant or a listed federal hazardous air pollutant. Therefore, this source is only subject to 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds. This regulation specifies general work practices such as apply to the storage, use, and clean-up of VOCs.

## 5. Permit Update

The table following provides a summary of the modifications made to this proposed permit.

Permit Page Number	Condition Number	Change Description/Comments
1-cover page	N/A	updated effective date, application number, and complete application date
2-table of contents	N/A	added Part II
3-Part I	Section 1-table	added Labeling System [ES-024] with table footnote
4	2.1(A) - table	added new permitting scenario references for sulfur dioxide and nitrogen oxides plus operating limit for Eldon Stack. Added table footnotes.
6	2.1(A)(4)	condition defines revised permitting scenario with sulfur dioxide and nitrogen oxides limitations for boiler #4
7	2.1(B) - table	added new permitting scenario references for sulfur dioxide, nitrogen oxides, and heat input limit plus operating limit for Eldon Stack. Added table footnotes.
9	2.1(B)(4)	condition defines revised permitting scenario with sulfur dioxide and nitrogen oxides limitations for boiler Nos. 5 and 6
10	2.1(B)(5)	condition defines heat input limitation for boiler Nos. 5 and 6
13	2.1(D)	added permit work practice condition for Labeling System [ES-024]
18	2.2(F)	added venting limitation for Eldon Stack [EP-18]
28	Part II	construction permit for Labeling System [ES-024]
attachment to cover letter	insignificant activities	added 10 cooking kettles to insignificant activities [no emissions from these sources] however does increase site steam demand

## 6. Facility Compliance Status

A site inspection was conducted on September 9, 2003 with the facility deemed in compliance with all applicable requirements.

Campbell Soup  
August 20, 2004

**7. Facility Emissions Review**

See table under Section B(2) for an incremental increase in emissions from the facility steam plant. As a result of this PSD application, the minor baseline date for PM-10 in Robeson County will now be triggered. In addition, for increment tracking, the emission increases for sulfur dioxide [114.2 pounds per hour], nitrogen oxides [24.1 pounds per hour] and PM-10 [12.3 pounds per hour] will be updated in the cover letter to the permit.

**8. Application Fee**

Applications 7800159.04A and B were consolidated into one application 7800159.04B. An application fee of \$834.00 was received on April 23, 2004 for 7800159.04A. For PSD application 7800159.04B, an application fee of \$12,982.00 was received on July 15, 2004.

**9. Zoning Consistency Determination**

A request for a zoning consistency determination was made to Ms. Michelle Ferzzell, Robeson County Zoning Administrator on July 8, 2004. Her office acknowledged receipt on July 9, 2004.

**10. Conclusions, Comments, and Recommendations**

All applicable Division of Air Quality air requirements should be met. Recommend issuance of this air permit.