



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

**MAY 15 2018**

Mr. Robert Sullivan  
ORM Manager  
Kraft Heinz Food Company  
2504 Industrial Rd  
Kirksville, MO 63501

RE: New Source Review Permit Amendment - Permit Number: 102016-007B  
Project Number: 2017-10-041; Installation Number: 001-0030

Dear Mr. Sullivan:

On October 20, 2017, the Air Pollution Control Program received your request to amend permit 102016-007A. According to your request Kraft Heinz Company would like to amend their current construction permit to correct the potential to emit (PTE) from permit 102016-007A as what was originally submitted is different from what actually got installed onsite.

The salt loading (EP-18) emissions were understated as no dust collector was installed as had been originally described in previous applications. A salt cleaning operation for the starch system and new brine tank were not in previous permit applications but got installed with this project and are being added to emissions in this amendment (EP-21 & EP-22). The new salt cleaning operation and new brine tank both have a maximum hourly design rate of 25 ton/hour. Emission factors from EPA AP-42, Section 9.9.7 "*Corn Wet Milling*" (January 1995) Table 1 were used for EP-21 & EP-22. Haul road emissions are being revised to reflect the increase in salt loading associated with emission units for salt loading/cleaning and the new brine tank. Haul road emission factors were taken from EPA AP-42, Section 13.2.1 "*Paved Roads*" (January 2011).

Boiler emissions are also being revised as the application for this amendment asks to use a different calculation methodology to be able to factor in the economizers not being utilized and both boilers (EP-13 & EP-14) are equipped with low NO<sub>x</sub> burners. The NO<sub>x</sub> concentration used in the F-Factor method was taken from the manufacturer guarantee of 30 ppmv and then a 10% safety factor was added to give a 33 ppmv for the NO<sub>x</sub> concentration of a single boiler for PTE purposes.

Special Condition 1 of this amendment supersedes Special Condition 2 of permit 102016-007 to remove EP-18 from the special condition as it was never hooked to the dust collector/bag filter as initially thought. Special Condition 2 of this amendment reestablishes the dust collector/baghouse special condition for the starch silo (EP-17).



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Table 2 of permit 102016-007A is amended below to reflect the addition the new salt cleaning and brine tank.

Table 2: Project Emission Points

Emission Point	Description	Project #
EP-13	Natural Gas Fired Boiler 1 (54.4 MMBtu/ hr)	2017-10-041 (amended)
EP-14	Natural Gas Fired Boiler 2 (54.4 MMBtu/ hr)	2017-10-041 (amended)
EP-15 &16	Spice Blending	2016-07-007
EP-17	Starch Silo	2016-07-007
EP-18	Salt Unloading	2017-10-041 (amended)
EP-19	Haul Roads	2017-10-041 (amended)
EP-20	Hot Water Heater (21 MMBtu/hr)	2016-11-036
EP-21	Salt Cleaning for Starch System	2017-10-041 (new equipment)
EP-22	Salt Brine Tank	2017-10-041 (new equipment)

Table 3 of permit 102016-007A is amended below to reflect the addition of different calculation methodology for the boilers, the increased haul road traffic, control efficiency of salt loading, and the addition of the salt cleaner and salt brine tank.

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2015 EIQ)	Potential Controlled Emissions of the Project
PM	25.0	N/A	N/D	15.41
PM <sub>10</sub>	15.0	N/A	2.87	10.90
PM <sub>2.5</sub>	10.0	N/A	1.83	6.76
SO <sub>x</sub>	40.0	N/A	0.02	0.33
NO <sub>x</sub>	40.0	N/A	3.81	31.26
VOC	40.0	N/A	2.34	3.07
CO	100.0	N/A	3.2	46.82
GHG (CO <sub>2</sub> e)	N/A	N/A	N/D	67,282.64
GHG (mass)	N/A	N/A	N/D	66,887.68
HAPs	10.0/25.0	N/A	0.00	1.05

\*N/A = Not Available-This refers to installation description about installation wide PTE (Special Condition 4 of permit # 102016-007).

N/D = Not Determined

Mr. Robert Sullivan  
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If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions regarding this amendment, please do not hesitate to contact Jordan Hull, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:jhj

Enclosures

c: Northeast Regional Office  
PAMS File: 2017-10-041

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Kraft Heinz Food Company  
Adair County, S33, T63N, R15W

1. **Superseding Condition**  
The conditions of this permit supersede Special Condition 2 found in the previously issued construction permit 102016-007 issued by the Air Pollution Control Program.
2. **Control Device Requirement-Dust Collectors/Bag filter**
  - A. Kraft Heinz Foods Company shall control particulate emissions from the following equipment using dust collectors, as specified in the permit application:
    - 1.) EP-17 Starch Silo
  - B. The dust collector shall be operated and maintained in accordance with the manufacturer's specifications. The dust collector shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
  - C. Replacement filters for the dust collector shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
  - D. Kraft Heinz Foods Company shall monitor and record the operating pressure drop across the dust collector at least once every 24 hours while the plant is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
  - E. Kraft Heinz Foods Company shall maintain a copy of the dust collector manufacturer's performance warranty on site.

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

- F. Kraft Heinz Foods Company shall maintain an operating and maintenance log for the dust collector which shall include the following:
  - 1.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - 2.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.