

PERMIT BOOK

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 042013-012 Project Number: 2012-11-061  
Installation Number: 207-0014

Parent Company: Nestlé Purina PetCare Company

Parent Company Address: Checkerboard Square - 2B, St. Louis, MO 63164-0001

Installation Name: Nestlé Purina PetCare Company, Golden Products Division

Installation Address: 22450 East State Hwy Y, Bloomfield, MO 63825

Location Information: Stoddard County, S28, T27N, R11E

Application for Authority to Construct was made for:

The permittee will install equipment to produce a new light weight engineered litter (light weight EL) using expanded perlite in place of the existing wet seed used in the current engineered litter process. Litter would be produced using existing coater. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

APR 30 2013

EFFECTIVE DATE

Handwritten signature of Kyna L Moore in cursive script.  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of startup of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual startup of these air contaminant sources.

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 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 AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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| Permit No.  |             |
| Project No. | 2012-11-061 |

**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."*

Nestlé Purina PetCare Company, Golden Products Division  
Stoddard County, S28, T27N, R11E

1. Nestlé Purina PetCare Company, Golden Products Division shall control emissions from the project equipment, listed in Attachment B to this review, using controls as listed below:

| <i>SOURCE ID</i> | <i>EMISSION SOURCE AND OPERATION</i>           | <i>Control ID</i> | <i>CONTROL DEVICE DESCRIPTION</i> |
|------------------|--|-------------------|-----------------------------------|
| EP20             | Engineered Litter Production and Transfer      | CD20              | Enclosed Structure                |
| EP30             | Scoop Litter Building Addition                 | CD30              | Fabric Filter - Low Temperature   |
| EP31             | Edison -Raw Material Unloading to Storage Bins | CD31              | Bin Vent Filter                   |
| EP32             | Edison - Filter Receivers                      | CD32              | Bin Vent Filter                   |

2. The permittee shall do the following with regard to the fabric filter:
  - A. Operate and maintain them in accordance with the manufacturer's specifications. The fabric filter 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 the Department of Natural Resources' employees may easily observe them.
  - B. Keep replacement filters on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

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### SPECIAL CONDITIONS:

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

- C. Monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
  - D. Maintain a copy of the baghouse manufacturer's performance warranty on site.
  - E. Maintain an operating and maintenance log for the baghouses 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.
3. Record Keeping and Reporting Requirements
- A. Nestlé Purina PetCare Company, Golden Products Division shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.
  - B. Nestlé Purina PetCare Company, Golden Products Division shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
4. Performance Testing
- A. Nestlé Purina PetCare Company, Golden Products Division shall perform testing on EP30 in accordance with 40 CFR Part 60, Subpart OOO, §60.675 Test methods and procedures.
  - B. § 60.8 Performance tests.
    - (a) Except as specified in paragraphs (a)(1),(a)(2), (a)(3), and (a)(4) of this section, within 60 days after achieving the maximum production rate from the proposed equipment (see Attachment B, the proposed equipment are highlighted), but not later than 180 days after initial startup of the proposed

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| Permit No.  |             |
| Project No. | 2012-11-061 |

#### SPECIAL CONDITIONS:

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

equipment<sup>1</sup> (see Attachment B, the proposed equipment are highlighted), and at such other times as may be required by the Administrator under section 114 of the Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Administrator a written report of the results of such performance test(s).

- C. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
- D. Two copies of a written report of the performance test results shall be submitted to the Director within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
- E. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations.

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<sup>1</sup> This construction permit involves a mix of existing and new equipment. Also, a pilot permit was approved related to this permit. Therefore, in order to avoid confusion for the permitting authority and the applicant, an initial startup date for the proposed equipment will considered to be June 10, 2013.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2012-11-061  
Installation ID Number: 207-0014  
Permit Number:

Nestlé Purina PetCare Company  
Golden Products Division  
22450 East State Hwy Y  
Bloomfield, MO 63825

Complete: December 12, 2012

Parent Company:  
Nestlé Purina PetCare Company  
Checkerboard Square - 2B  
St. Louis, MO 63164-0001

Stoddard County, S28, T27N, R11E

REVIEW SUMMARY

- Nestlé Purina PetCare Company, Golden Products Division has applied for authority to install equipment to produce a new light weight engineered litter (light weight EL) using expanded perlite in place of the existing wet seed used in the current engineered litter process. Litter would be produced using the existing coater.
- HAP emissions are not expected from the proposed equipment.
- 40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" applies to some of the equipment.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- CD20, CD30, CD31 and CD32 are being used to control the PM, PM<sub>10</sub>, PM<sub>2.5</sub> emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM<sub>10</sub> are below de minimis levels.
- This installation is located in Stoddard County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emission testing is required for the EP30.
- A revised Intermediate Operating Permit is required for this installation within 90 days of equipment startup.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Nestlé Purina PetCare Company, Golden Products Division is an Intermediate State Installation under the Missouri operating permit program. The engineered litter products facility is located in Bloomfield, Missouri, Stoddard County (denoted by the “A” on the map).



Ralston acquired the Golden Cat Corporation, North America's leading marketer of cat box filler in 1995. Nestle Purina PetCare Company – Golden Products Division (formerly Ralston Purina Company) operates a pet absorbent products plant in Bloomfield, Missouri.

The Golden Products Bloomfield facility mines and processes clay to produce pet absorbent materials, such as cat litter. The facility has numerous pieces of equipment in series that handle in-process clay, e.g., elevators, conveyors, receiving bins, etc. An essential and integral part of the production process involves the removal of fines from the clay as it passes through the various production steps in order to meet product specifications. To enhance the removal of fines from the clay, the Bloomfield facility uses special devices called an aspirator (also referred to as "air ladders") at several locations throughout each production line. The aspirators are devices uniquely designed for the express purpose of pneumatically separating fines from the in-process clay. After passing an aspirator, the in-process clay is essentially free of fines. Fines

picked-up at the aspirators and at various material transfer points along the production line, are aspirated to and removed by a common fabric filter collector (baghouse) prior to the air stream being discharged to atmosphere. It is important to emphasize that the primary function of this aspiration system, including the collector, is for fines removal to achieve strict product specifications which include a 99% dust free product, and not for emission control. This makes the collector an integral part of the process and not an emission control device. Nearly all of the fines removed from the processed clay are reworked as a raw ingredient in the Engineered Litter process.

The following New Source Review permits have been issued to Nestlé Purina PetCare Company, Golden Products Division from the Air Pollution Control Program.

Table 1: Project History

| Reference No. | Permit Number | Start Date | Complete Date | Description   |
|---------------|---------------|------------|---------------|---|
| AP200104053   | 052001-025    | 04/13/01   | 05/31/01      | Rotary Drying modifications   |
| EX199902037   |               | 02/05/99   | 03/25/99      | Like for like screen replacement  |
| AP201111029   | 102011-009A   | 11/21/11   | 01/18/12      | Monitoring Changes  |
| EX199907073   | 1199-006      | 07/23/99   | 11/10/99      | Aspiration system upgrade   |
| EX200002006   | 072000-010    | 01/28/00   | 02/27/01      | fines recovery & dryer control  |
| AP200310084   | 032004-013    | 12/09/03   | 03/12/04      | Clay fine recycling   |
| EX200101045   | 032001-014    | 01/17/01   | 03/28/01      | Clumping Process Modifications  |
| AP200409072   |               | 09/24/04   | 10/01/07      | Kitty Litter, OP  |
| AP201004024   |               | 04/07/10   | 10/07/10      | Litter Dryers   |
| AP200501087   | 052005-009    | 01/27/05   | 05/11/05      | Clay Process  |
| AP200504033   | 072005-046    | 04/11/05   | 07/22/05      | Cat litter expansion  |
| EX199807004   |               | 06/30/98   | 08/11/98      | Replacing Packing & Unloading Equipment   |
| AP201012061   |               | 12/20/10   | 03/19/12      | Confidentiality for 2006-07-001 Resubmittal, OP   |
| AP201101001   | 102011-009    | 01/03/11   | 10/17/11      | Additional Equipment  |
| AP201101002   |               | 01/03/11   | 03/19/12      | Confidentiality for 2011-01-001   |
| AP200603006   |               | 03/01/06   | 06/14/06      | Pin Mixer Project   |
| AP200603036   |               | 03/01/06   | 05/30/06      | Confidentiality for 2006-03-006   |
| AP200604005   |               | 04/03/06   | 05/31/06      | Belt conveyor and elevator  |
| AP200607001   |               | 07/03/06   |               | Cat Litter Production, OP   |
| AP200607086   |               | 07/03/06   | 12/19/07      | Confidentiality for OP - 2006-07-001  |
| EX46000014005 | 1093-013      | 02/19/93   | 09/27/93      | New dust collection installation  |
| EX46000014006 | 1094-012      | 06/28/94   | 10/17/94      | Installation of a Bemis bagger system as a replacement  |
| EX46000014007 | 0195-004      | 09/26/94   | 12/20/94      |   |
| EX46000014008 |               | 10/24/94   | 11/07/94      |   |
| EX46000014009 | 0495-004      | 12/21/94   | 03/16/95      | Two screens, hammermill, storage bin, two vibrating feeders, one rotary filler, two conveyors and one bucket elevator |
| EX46000014010 | 0995-009      | 05/16/95   | 09/11/95      | One bucket elevator, conveyors, surge hoppers and one supersack unloading station                                     |
| EX46000014011 | 0396-027      | 11/30/95   | 03/27/96      | modifications to system   |



| Reference No. | Permit Number | Start Date | Complete Date | Description   |
|---------------|---------------|------------|---------------|---|
| EX46000014012 |               | 05/13/96   | 06/26/96      | Contaminated storm water aeration   |
| EX46000014013 | 1296-005      | 08/01/96   | 12/04/96      | install baghouse and dust collection  |
| EX46000014014 |               | 01/07/97   | 10/20/97      | Truck Unloading Process   |
| EX46000014015 |               | 07/15/96   | 09/21/01      | Clay Cat Litter, OP   |
| EX46000014016 |               | 01/28/97   | 02/20/97      | elevator replacement  |
| EX46000014017 |               | 03/10/97   | 03/18/97      | extension of two year time limit to construct on permit # 0195-004; to install second packaging line covered in the permit. |
| AP200110042   |               | 10/11/01   | 09/24/04      | Kitty Litter, OP  |
| AP200110047   |               | 10/15/01   | 12/12/01      | Conveyor replacement  |
| AP200203101   | 082002-018    | 06/11/02   | 08/27/02      | Clay Mining & Handling  |
| AP200206046   |               | 06/11/02   | 08/27/02      | Confidentiality Request for 2002-03-101   |

## PROJECT DESCRIPTION

### Overall

The Edison engineered litter product will be manufactured using some of the same equipment as the existing engineered litter products currently manufactured at the facility. Therefore, emission estimates from this manufacturing equipment are not addressed in this permit since only one product can be manufactured at a time. This represents an "either/or" scenario for the manufacturing components of the process, and thus, emission potential will not increase in the manufacturing of engineered litter with this new product. There are however, new receiving, processing, storage and transfer equipment that will be constructed with the addition of this new product. These components are addressed in this permit application. EP31 and EP32 represent new emission points at the facility. Additional sources are being added to existing emission points EP30 and EP20 and the incremental additional emissions from these sources are addressed for each of these emission points.

### EP20

This is an existing emission point at the facility and represents various non-aspirated engineered litter handling equipment. The only source proposed to be added to this emission point is a belt conveyor (CNV0003725). This proposed source is indicated in red in the emission point detail. Some of the existing equipment associated with EP20 is subject to *40 CFR 60 Subpart 000, "Standards of Performance for Nonmetallic Mineral Processing Plants"*.

### **EP30**

This is an existing emission point at the facility and represents existing and new indoor aspirated engineered litter sources, as well as outdoor transfer and storage equipment. Baghouse (POL3287) controls aspirated emissions from these sources. Sources indicated in red in the emission point detail represent the proposed equipment in this permit application. Recent source testing data (October 2012) is presented regarding the emissions from this point. As part of the additional equipment proposed to be added to this baghouse, the fan motor will be replaced to increase the airflow through the baghouse collection system from 20,000 cubic feet per minute (cfm) to 30,000 cfm. The emission factor developed from the stack test has been linearly scaled up based on the increased air flow to account for a higher air to cloth ratio and to predict the additional aspirated sources.

### **EP31**

This emission point is a new emission point at the facility. The emissions from the positive pneumatic unloading (railcar and truck) system will vent to the two storage bin vents.

### **EP32**

This is a new emission point for the facility. Two filter receiver bins are included with this emission point. The first filter receiver bin (BIN3733) receives vacuum transferred raw material elevated above the proposed screen. Emissions exhaust through a fabric filter bin vent and the vacuum system. The second filter receiver bin (BIN0003728) receives vacuum transferred fines and overs from the proposed screen. Emissions exhaust through a fabric filter bin vent and the vacuum system.

## **EMISSIONS/CONTROLS EVALUATION**

Much of the project information is confidential and contained in a separate, confidential folder. Requests can be made to review that information and will only be granted under certain circumstances. Please refer to state rule *10 CSR 10-6.210 Confidential Information*.

Control devices are involved with this project and are being required as special permit conditions. That means that the control devices are considered in the emissions analysis.

An Actual-to-potential test (worse case emissions<sup>2</sup>) was performed on this project to

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2 40 CFR Part 52.165(a)(2)(ii)(F) Hybrid test for projects that involve multiple types of emissions units. A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the emissions increases for each emissions unit, using the method specified in paragraphs (a)(2)(iv)(c) through (d) of this section as applicable with respect to each emissions unit, for each type of emissions unit equals or exceeds the significant amount for that pollutant (as defined in paragraph (b)(23) of this section). Projected actual emissions means the maximum annual rate, in tons per year, at which an existing emissions unit is projected to emit a regulated NSR pollutant in any one of the 5 years (12-month period) following the date the unit resumes regular operation after the project, or in any one of the 10 years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit that regulated NSR pollutant and full utilization of the unit would result in a significant emissions increase or a significant net emissions increase at the major stationary source.

determine what pollutants, if any, would exceed the significant emissions threshold (refer to Attachment A for the results of this analysis). Because this facility is covered by an Intermediate State Installation operating permit, all pollutants must remain below the “major source” threshold. However, should the individual project exceed the significance thresholds, then air quality modeling would need to be performed. A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the potential to emit (as defined in paragraph (b)(4) of this section) from each new emissions unit following completion of the project and the baseline actual emissions (as defined in paragraph (b)(48)(iii) of this section) of these units before the project equals or exceeds the significant amount for that pollutant (as defined in paragraph (b)(23) of this section).

The emission factors and control efficiencies used in this analysis were appropriately documented on the associated workbooks.

The following table provides an emissions summary for this project. Existing potential emissions are based on the permittee’s Intermediate State Installation operating permit. If the permittee becomes a Part 70 State Installation, then the accumulation of projects will be evaluated for the applicability of 10 CSR 10-6-060 section (8) (“Prevention of Significant Deterioration”). Existing actual emissions were taken from the installation’s 2011 EIQ. Potential emissions of the application represent the potential of the new equipment and utilized existing equipment, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tons per year)

| Pollutant               | Regulatory <i>De Minimis</i> Levels | Existing Potential Emissions | Existing Actual Emissions (2011 EIQ) | Potential Emissions of the Application | New Installation Conditioned Potential <sup>3</sup> |
|-------------------------|-------------------------------------|------------------------------|--------------------------------------|--|---|
| PM                      | 25.0                                | 100 <sup>4</sup>             | N/D                                  | N/D                                    |   |
| PM <sub>10</sub>        | 15.0                                | 95                           | 25.6                                 | 4.3                                    |   |
| PM <sub>2.5</sub>       | 10.0                                | 100                          | 13.7                                 | 4.3                                    |   |
| SO <sub>x</sub>         | 40.0                                | 100                          | 0.3                                  | --                                     |   |
| NO <sub>x</sub>         | 40.0                                | 100                          | 59.2                                 | --                                     |   |
| VOC                     | 40.0                                | 7.5                          | 2.5                                  | --                                     |   |
| CO                      | 100.0                               | 100                          | 38.3                                 | --                                     |   |
| GHG (CO <sub>2</sub> e) | 75,000 / 100,000                    | 100,000                      | 48,416                               | N/A                                    |   |
| GHG (mass)              | 0.0 / 100.0 / 250.0                 | 100                          | N/D                                  | N/A                                    |   |
| HAPs                    | 10.0/25.0                           | 10.0/25.0                    | -- <sup>5</sup>                      | --                                     | --  |

N/A = Not Applicable; N/D = Not Determined

<sup>3</sup> The new equipment will be incorporated into the existing installation, plant-wide emission caps.

<sup>4</sup> This facility is an Intermediate State Installation according to 10 CSR 10-6.065 Operating Permits. As such, the facility is limited to less than the Part 70 State Installation threshold levels for all regulated pollutants whose potential to emit, in absence of the voluntary limit, exceed the Part 70 thresholds.

<sup>5</sup> Indicates the pollutant level is below the detectable threshold.

## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM<sub>10</sub> are below de minimis levels.

## APPLICABLE REQUIREMENTS

Nestlé Purina PetCare Company, Golden Products Division shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

### SPECIFIC REQUIREMENTS

- *New Source Performance Regulations*, 10 CSR 10-6.070
  - *40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants"*

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

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Randy E. Raymond  
Environmental Technician

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Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated November 21, 2012, received November 27, 2012, designating Nestlé Purina PetCare Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Attachment A  
 Nestle Purina PetCare Co., Golden Products Division  
 Bloomfield Facility

Project Actual-to-Potential Analysis

| <b>Pollutant</b>        | <b>De Minimis</b>       | <b>Average Annual Emissions</b> | <b>Increase (tons/yr)</b> |
|-------------------------|-------------------------|---------------------------------|---------------------------|
| PM <sub>10</sub>        | 15                      | 9.33                            | 4.68                      |
| PM <sub>2.5</sub>       | 10                      | 9.33                            | 4.68                      |
| NO <sub>x</sub>         | 40                      | 0.00                            | 0.00                      |
| SO <sub>x</sub>         | 40                      | 0.00                            | 0.00                      |
| VOC                     | 40                      | 0.00                            | 0.00                      |
| CO                      | 100                     | 0.00                            | 0.00                      |
| GHG (CO <sub>2</sub> e) | 75,000;<br>100,000      |                                 |                           |
| GHG (mass)              | 0.0;<br>100.0;<br>250.0 |                                 |                           |

Attachment B  
Nestle Purina PetCare Co., Golden Products Division  
Bloomfield Facility

| <b>Emission Point No.</b> | <b>Description</b>                       | <b>Current Equipment ID</b> | <b>Equipment Type</b> |
|---------------------------|--|-----------------------------|-----------------------|
| EP20a                     | Belt Conveyor Transfer Points - Existing | CNV0001801                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - New      | CNV0001812                  | Conveyor              |
|                           | Storage Bin                              | BIN0001907                  | Bin                   |
|                           | Screening storveyor                      | CNV0002823                  | Storveyor             |
|                           | Screening storveyor                      | CNV0002824                  | Storveyor             |
| EP20b                     | Belt Conveyor Transfer Points - Existing | CNV0001813                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001815                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001816                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | BSC0001817                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001818                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001819                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001820                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001822                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001823                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001824                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001825                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001847                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001849                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001854                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001855                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001856                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001863                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0002364                  | Conveyor              |
|                           | Volumetric Feeder - Existing             | DSP0001930                  | Feeder                |
|                           | Volumetric Feeder - Existing             | DSP0001932                  | Feeder                |
|                           | Storage Bin - Existing                   | BIN0001908                  | Bin                   |
|                           | Storage Bin - Existing                   | BIN0001909                  | Bin                   |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001917                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - New      | CNV0003174                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - New      | CNV0003271                  | Conveyor              |
|                           | CONVEYOR B/W STORVEYOR AND EX CNV1813    | CNV0003272                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0001803                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0002330                  | Conveyor              |
|                           | Belt Conveyor Transfer Points - Existing | CNV0002633                  | Conveyor              |
|                           | CONVEYOR BETWEEN STORVEYOR AND SHUTTLE   | CNV0003192                  | Conveyor              |
|                           | SEED SHUTTLE CONVEYOR                    | CNV0003193                  | Conveyor              |
|                           | COATER STORVEYOR                         | CNV0003194                  | Storveyor             |
|                           | SPLITS BETWEEN E COATERS AND F COATERS   | BSC0003195                  | Conveyor              |
| SPLITS BETWEEN 1E AND 2E  | CNV0003196                               | Conveyor                    |                       |
| SPLITS BETWEEN 1F AND 2F  | CNV0003197                               | Conveyor                    |                       |
| DRYER C STORVEYOR         | CNV0003201                               | Storveyor                   |                       |

| Emission Point No. | Description                                    | Current Equipment ID | Equipment Type  |
|--------------------|--|----------------------|-----------------|
|                    | COATER RECYCLE CONVEYOR                        | CNV0003202           | Conveyor        |
|                    | DRYER RECEIVING CONVEYOR                       | CNV0003212           | Conveyor        |
|                    | Edison Belt Conveyor Transfer Point            | CNV0003725           | Conveyor        |
| EP20c              | Bentonite Storage Bin - Existing               | POL0001896           | Bin             |
|                    | Bentonite Storage Bin - Existing               | POL0001936           | Bin             |
|                    | Enrober - Existing                             | ERB0001931           | Enrober         |
|                    | Enrober - Existing                             | ERB0001933           | Enrober         |
|                    | COATING BENTONITE RECEIVER                     | POL0003151           | Filter Receiver |
|                    | SCREW CONVEYOR ABOVE DRY SCREEN                | CNV0003280           | Conveyor        |
| EP30               | DRY SCREEN OVERS RECYCLE CONVEYOR              | CNV0003203           | Conveyor        |
|                    | CLOD CATCHER ON ELEVATOR INLET                 | 3213                 |                 |
|                    | SCREW CONVEYOR ON ASPIRATION BAGHOUSE          | CNV0003288           | Conveyor        |
|                    | DRYER SHUTTLE CONVEYOR                         | CNV0003200           | Conveyor        |
|                    | STORVEYOR TO NEW SYSTEMS                       | CNV0003175           | Storveyor       |
|                    | ELEVATOR BETWEEN DRYER AND DRY SCREEN          | ELV0003214           | Elevator        |
|                    | FINISHED PRODUCT ELEVATOR                      | ELE0003224           | Elevator        |
|                    | REPLACES EX ELEVATOR 2994 ON BLEND BACK SYSTEM | ELE0003315           | Elevator        |
|                    | COATER E RECEIVING - REVERSIBLE                | CNV0003198           | Conveyor        |
|                    | COATER F RECEIVING - REVERSIBLE                | CNV0003199           | Conveyor        |
|                    | COATER F RECEIVING - REVERSIBLE                | CNV0003273           | Conveyor        |
|                    | COATER F RECEIVING - REVERSIBLE                | CNV0003274           | Conveyor        |
|                    | CNV B/W COATER REC CNVS & DRYER C SHUTTLE      | CNV0003275           | Conveyor        |
|                    | COATER 1E                                      | MIX0003160           | Coater          |
|                    | COATER 2E                                      | MIX0003161           | Coater          |
|                    | COATER 1F                                      | MIX0003169           | Coater          |
|                    | COATER 2F                                      | MIX0003170           | Coater          |
|                    | DRY SCREEN                                     | SCR0003217           | Screen          |
|                    | Raw Material Screen                            | SCR0003722           | Screen          |
|                    | Surge Bin                                      | BIN0003723           | Bin             |
|                    | Belt Scale                                     | BSC0003723           | Scale           |
|                    | Enrober  | ENR0003724           | Enrober         |
|                    | Belt Conveyor Transfer Point                   | CNV0003739           | Conveyor        |
|                    | Bucket Elevator                                | ELE0003741           | Elevator        |
|                    | Surge Bin                                      | BIN0003743           | Bin             |
|                    | Belt Conveyor Transfer Point                   | CNV0003744           | Conveyor        |
|                    | EP31   | Storage Bin          | BIN0003713      |
| Storage Bin        |  | BIN0003714           | Bin             |
| EP32               | Filter Receiver (Raw Material)                 | BIN0003733           | Bin             |
|                    | Filter Receiver (Overs/Fines)                  | BIN0003728           | Bin             |

Existing  
Proposed



## APPENDIX A

### Abbreviations and Acronyms

|                               |  |                               |  |
|-------------------------------|--|-------------------------------|--|
| <b>%</b> .....                | percent                                | <b>m/s</b> .....              | meters per second  |
| <b>°F</b> .....               | degrees Fahrenheit                     | <b>Mgal</b> .....             | 1,000 gallons  |
| <b>acfm</b> .....             | actual cubic feet per minute           | <b>MW</b> .....               | megawatt   |
| <b>BACT</b> .....             | Best Available Control Technology      | <b>MHDR</b> .....             | maximum hourly design rate                                       |
| <b>BMPs</b> .....             | Best Management Practices              | <b>MMBtu</b> ....             | Million British thermal units                                    |
| <b>Btu</b> .....              | British thermal unit                   | <b>MMCF</b> .....             | million cubic feet   |
| <b>CAM</b> .....              | Compliance Assurance Monitoring        | <b>MSDS</b> .....             | Material Safety Data Sheet                                       |
| <b>CAS</b> .....              | Chemical Abstracts Service             | <b>NAAQS</b> ...              | National Ambient Air Quality Standards                           |
| <b>CEMS</b> .....             | Continuous Emission Monitor System     | <b>NESHAPs</b>                |  |
| <b>CFR</b> .....              | Code of Federal Regulations            | .....                         | National Emissions Standards for Hazardous Air Pollutants        |
| <b>CO</b> .....               | carbon monoxide                        | <b>NO<sub>x</sub></b> .....   | nitrogen oxides  |
| <b>CO<sub>2</sub></b> .....   | carbon dioxide                         | <b>NSPS</b> .....             | New Source Performance Standards                                 |
| <b>CO<sub>2e</sub></b> .....  | carbon dioxide equivalent              | <b>NSR</b> .....              | New Source Review  |
| <b>COMS</b> .....             | Continuous Opacity Monitoring System   | <b>PM</b> .....               | particulate matter   |
| <b>CSR</b> .....              | Code of State Regulations              | <b>PM<sub>2.5</sub></b> ..... | particulate matter less than 2.5 microns in aerodynamic diameter |
| <b>dscf</b> .....             | dry standard cubic feet                | <b>PM<sub>10</sub></b> .....  | particulate matter less than 10 microns in aerodynamic diameter  |
| <b>EQ</b> .....               | Emission Inventory Questionnaire       | <b>ppm</b> .....              | parts per million  |
| <b>EP</b> .....               | Emission Point                         | <b>PSD</b> .....              | Prevention of Significant Deterioration                          |
| <b>EPA</b> .....              | Environmental Protection Agency        | <b>PTE</b> .....              | potential to emit  |
| <b>EU</b> .....               | Emission Unit                          | <b>RACT</b> .....             | Reasonable Available Control Technology                          |
| <b>fps</b> .....              | feet per second                        | <b>RAL</b> .....              | Risk Assessment Level  |
| <b>ft</b> .....               | feet                                   | <b>SCC</b> .....              | Source Classification Code                                       |
| <b>GACT</b> .....             | Generally Available Control Technology | <b>scfm</b> .....             | standard cubic feet per minute                                   |
| <b>GHG</b> .....              | Greenhouse Gas                         | <b>SIC</b> .....              | Standard Industrial Classification                               |
| <b>gpm</b> .....              | gallons per minute                     | <b>SIP</b> .....              | State Implementation Plan  |
| <b>gr</b> .....               | grains                                 | <b>SMAL</b> .....             | Screening Model Action Levels                                    |
| <b>GWP</b> .....              | Global Warming Potential               | <b>SO<sub>x</sub></b> .....   | sulfur oxides  |
| <b>HAP</b> .....              | Hazardous Air Pollutant                | <b>SO<sub>2</sub></b> .....   | sulfur dioxide   |
| <b>hr</b> .....               | hour                                   | <b>tph</b> .....              | tons per hour  |
| <b>hp</b> .....               | horsepower                             | <b>tpy</b> .....              | tons per year  |
| <b>lb</b> .....               | pound                                  | <b>VMT</b> .....              | vehicle miles traveled   |
| <b>lbs/hr</b> .....           | pounds per hour                        | <b>VOC</b> .....              | Volatile Organic Compound  |
| <b>MACT</b> .....             | Maximum Achievable Control Technology  |                               |  |
| <b>µg/m<sup>3</sup></b> ..... | micrograms per cubic meter             |                               |  |

Mr. Keith Harris  
Plant Engineering Manager  
Nestlé Purina PetCare Company, Golden Products Division  
22450 East State Hwy Y  
Bloomfield, MO 63825

RE: New Source Review Permit - Project Number: 2012-11-061

Dear Mr. Harris:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Randy E. Raymond, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:rrk

Enclosures

c: Southeast Regional Office  
PAMS File: 2012-11-061

Permit Number: