



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

October 19, 2020

Mike Nohara-LeClair
Principal Environmental Engineer
Nestle Purina PetCare Company - Golden Products Division
22450 East State Highway Y
Bloomfield, MO 63825

RE: New Source Review Permit - Project Number: 2020-05-044

Dear Mike Nohara-LeClair:

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 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 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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



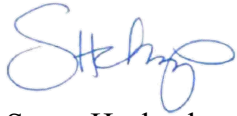
Mike Nohara-LeClair
Page Two

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.ao.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Jared Rhodes, at the Department of Natural Resources' 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



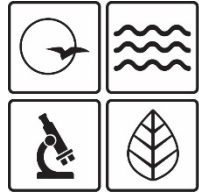
Susan Heckenkamp
New Source Review Unit Chief

SH:jara

Enclosures

c: Southeast Regional Office
PAMS File: 2020-05-044

Permit Number: 102020-005



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: 102020-005 Project Number: 2020-05-044
Installation Number: 207-0014

Parent Company: Nestle Purina PetCare Company

Parent Company Address: 1 Checkerboard Square - 2B, St. Louis, MO 63102

Installation Name: Nestle Purina PetCare Company - Golden Products Division

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

Location Information: Stoddard County, S28, T27N, R11E

Application for Authority to Construct was made for:

The construction of additional air emission equipment in the Lightweight Litter Process at Nestle Purina PetCare Company's pet absorbent manufacturing facility located in Bloomfield, MO. 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.



Director or Designee
Department of Natural Resources

October 19, 2020
Effective Date

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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 source(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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

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 to 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 (3)(E). "Conditions required by permitting authority."

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

1. **PM₁₀ Emission Limitation**
 - A. Nestle Purina PetCare Company - Golden Products Division shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month period from emission points listed in Table 1. Nestle Purina PetCare Company - Golden Products Division shall include all actual emissions in the limit including Startup, Shutdown & Malfunction (SSM) emissions as well as any excess SSM emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section in accordance with the requirements of 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions*.

Table 1: Emissions Points included in 15.0 tpy PM₁₀ Limit

Emission Point	Emission Factor (lb PM ₁₀ per ton throughput)	Associated Permit Project
EP14a		012019-007
EP14b		012019-007
EP32		012019-001A
EP38		012019-007
EP58		012019-001A
EP59		012019-001A
EP68		012019-001A
EP69		012019-001A
EP70		012019-001A
EP71		012019-001A and This Permit
EP72		012019-001A and This Permit
EP73		012019-001A
EP74		012019-001A
EP75		012019-001A
EP80		022020-004
EP81		022020-004
EP82		022020-004
EP83	0.06	022020-004
EP84		022020-004
EP85		022020-004

SPECIAL CONDITIONS:

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

Emission Point	Emission Factor (lb PM ₁₀ per ton throughput)	Associated Permit Project
EP86	0.475	022020-004
EP87		022020-004
EP88		This Permit
EP89	0.00122	This Permit
EP90		This Permit
EP91		This Permit
EP92		This Permit
EP93		This Permit
EP94		This Permit
EP95		This Permit
EP96		This Permit
EP97		This Permit
EP98		This Permit
EP99		This Permit
EP100		This Permit
EP101		This Permit
EP102		This Permit

- B. Nestle Purina PetCare Company - Golden Products Division shall develop and use forms to demonstrate compliance with Special Condition 1.A. The forms shall contain at a minimum the following information,
- 1) Installation name
 - 2) Installation ID
 - 3) Permit number
 - 4) Current month
 - 5) Current 12-month date range
 - 6) Monthly throughput for each emission point with the potential to emit PM₁₀ as listed in Table 1.
 - 7) PM₁₀ emission factors for each emission unit as determined by testing required for 40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" and 40 CFR 60 Subpart UUU, "Standards of Performance for Calciners and Dryers in Mineral Industries" and approved by the Air Pollution Control Program
 - a. The emissions factors for each emissions point listed in Table 1 are current at the time of this permit's issuance, but may not represent current emission factors once stack testing has been performed.
 - b. When Nestle Purina PetCare Company - Golden Products Division tests PM₁₀ emissions as required in 40 CFR Part 60 Subpart OOO and Subpart UUU, Nestle Purina PetCare

SPECIAL CONDITIONS:

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

Company - Golden Products Division shall develop and use new PM₁₀ emission factors to demonstrate compliance with Special Condition 1.A.

- 8) Monthly emissions for each emission unit calculated using the following equation:

$$PM_{10} \text{ emissions (tons)} = \text{Monthly throughput (tons)} \times \text{Emission unit specific emission factor} \left(\frac{\text{lb } PM_{10}}{\text{ton of throughput}} \right) \times \left(\frac{1 \text{ ton } PM_{10}}{2000 \text{ lbs } PM_{10}} \right)$$
- 9) Monthly emissions of PM₁₀ calculated by summing all PM₁₀ emissions from emission points listed in Table 1.
- 10) 12-month rolling total PM₁₀ emissions from emission points listed in Table 1 and the sum of all PM₁₀ emissions from startup, shutdown, and malfunction.
- 11) Indication of compliance with Special Condition 1.A.

2. Control Device Requirement-Baghouse

- A. Nestle Purina PetCare Company - Golden Products Division shall control emissions from the equipment listed in Table 2 using baghouses as specified in the permit application.

Table 2: Baghouses and Equipment Controlled by Baghouses

Emissions Point	Baghouse ID	Equipment ID	Description
EP71	CD71	CNV0010261	XP Furnace Elevator Feeder 1
EP71	CD71	CNV0010260	XP Collector Surge Bin
EP72	CD72	CNV0010263	XP Furnace Elevator Feeder 2
EP72	CD72	ELV0010264	XP Furnace Elevator 2
EP88	CD88	CNV0007512	Coater E-F Feed Conveyor
EP88	CD88	BIN0007513	Coater 1E-2E Surge Bin
EP88	CD88	CNV0007514	Coater 1E-2E Feed Conveyor
EP88	CD88	BSC0007572	Coater 1E-2E Belt Scale
EP88	CD88	CNV0007517	Coater 1E-2E Feed Conveyor
EP88	CD88	BIN0007518	Coater 1F-2F Surge Bin
EP88	CD88	CNV0007531	Coater 1F-2F Feed Conveyor
EP88	CD88	BSC0007573	Coater 1F-2F Belt Scale
EP88	CD88	CNV0007534	Coater 1F-2F Feed Conveyor
EP88	CD88	CNV0007553	Bentonite Airslide to Coater 1E-2E
EP88	CD88	MIX0007519	Coater 2E

SPECIAL CONDITIONS:

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

Emissions Point	Baghouse ID	Equipment ID	Description
EP88	CD88	CNV0007524	Coater 2E Discharge Conveyor
EP88	CD88	MIX0007525	Coater 1E
EP88	CD88	CNV0007530	Coater 1E Discharge Conveyor
EP88	CD88	CNV0007561	Bentonite Airslide to Coater 1F-2F
EP88	CD88	MIX0007535	Coater 2F
EP88	CD88	CNV0007540	Coater 2F Discharge Conveyor
EP88	CD88	MIX0007541	Coater 1F
EP88	CD88	CNV0007546	Coater 1F Discharge Conveyor
EP88	CD88	POL0007163	Coater E-F Baghouse
EP90	CD90	CNV0010001	Ore Transfer Conveyor 1
EP90	CD90	BSC0010002	Ore Transfer Conveyor 1 Belt Scale
EP90	CD90	CNV0010003	Ore Transfer Conveyor 2
EP90	CD90	CNV0010004	Ore Transfer Conveyor 3
EP90	CD90	CNV0010005	Ore Reversing Conveyor
EP90	CD90	BIN0010006	Ore Bin South
EP90	CD90	BIN0010009	Ore Bin North
EP90	CD90	CNV0010012	Ore Reversing Feeder Conveyor
EP90	CD90	BSC0010013	Ore Reversing Feeder Conveyor Belt Scale
EP90	CD90	SCR0010014	Ore Screener
EP90	CD90	ELV0010017	Ore Elevator
EP90	CD90	BIN0010018	Ore Surge Hopper
EP90	CD90	CNV0010020	Ore Shuttle Supply Weighbelt Feeder
EP90	CD90	CNV00010021	Ore Shuttle Feeder
EP90	CD90	BIN0010030	Ore Surge Bin #11
EP90	CD90	CNV0010034	Ore Weighbelt Feeder
EP90	CD90	BIN0010036	Ore Hopper
EP90	CD90	CNV0010038	Ore Furnace #11 Feed Reversing Conveyor
EP90	CD90	BIN0010080	Ore Surge Bin #12
EP90	CD90	CNV0010084	Ore Weighbelt Feeder
EP90	CD90	BIN0010086	Ore Hopper
EP90	CD90	CNV0010088	Ore Furnace #12 Feed Reversing Conveyor
EP90	CD90	BIN0010130	Ore Surge Bin #13
EP90	CD90	CNV0010134	Ore Weighbelt Feeder
EP90	CD90	BIN0010136	Ore Hopper
EP90	CD90	CNV0010138	Ore Furnace #13 Feed Reversing Conveyor
EP90	CD90	BIN0010180	Ore Surge Bin #14
EP90	CD90	CNV0010184	Ore Weighbelt Feeder
EP90	CD90	BIN0010186	Ore Hopper

SPECIAL CONDITIONS:

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

Emissions Point	Baghouse ID	Equipment ID	Description
EP90	CD90	CNV0010188	Ore Furnace #14 Feed Reversing Conveyor
EP90	CD90	BIN0010235	Ore Fines Surge Bin
EP90	CD90	BIN0010235	ORE FINES SURGE BIN From ORE SCREENER
EP90	CD90	POL0010237	Ore Fines Dust Collector
EP90	CD90	CNV0010244	Ore Fines Dust Collector Screw Conveyor
EP91	CD91	FUR0010042	Expander Furnace
EP91	CD91	SEP0010048	XP Separator
EP91	CD91	POL0010051	High Temperature Fines Baghouse
EP92	CD92	FUR0010092	Expander Furnace
EP92	CD92	SEP0010098	XP Separator
EP92	CD92	POL0010101	High Temperature Fines Baghouse
EP93	CD93	FUR0010142	Expander Furnace
EP93	CD93	SEP0010148	XP Separator
EP93	CD93	POL0010151	High Temperature Fines Baghouse
EP94	CD94	FUR0010192	Expander Furnace
EP94	CD94	SEP0010198	XP Separator
EP94	CD94	POL0010201	High Temperature Fines Baghouse
EP95	CD95	POL0010059	Furnace Process Line 11 - XP Receiver
EP96	CD96	POL0010109	Furnace Process Line 12 - XP Receiver
EP97	CD97	POL0010159	Furnace Process Line 13 - XP Receiver
EP98	CD98	POL0010209	Furnace Process Line 14 - XP Receiver
EP99	CD99	SCR0010068	XP Screener #11
EP99	CD99	DIV0010072	XP Screener #11 Diverter
EP99	CD99	BIN0010075	XP Hopper #11
EP99	CD99	CNV0010076	XP Weighbelt Feeder #11
EP99	CD99	SCR0010118	XP Screener #12
EP99	CD99	DIV0010072	XP Screener #12 Diverter
EP99	CD99	BIN0010125	XP Hopper #12
EP99	CD99	CNV0010126	XP Weighbelt Feeder #12
EP99	CD99	SCR0010168	XP Screener #13
EP99	CD99	DIV0010072	XP Screener #13 Diverter
EP99	CD99	BIN0010175	XP Hopper #13
EP99	CD99	CNV0010176	XP Weighbelt Feeder #13
EP99	CD99	SCR0010218	XP Screener #14
EP99	CD99	DIV0010072	XP Screener #14 Diverter
EP99	CD99	BIN0010225	XP Hopper #14
EP99	CD99	CNV0010226	XP Weighbelt Feeder #14
EP99	CD99	CNV0004490	XP Collection Conveyor

SPECIAL CONDITIONS:

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

Emissions Point	Baghouse ID	Equipment ID	Description
EP99	CD99	ELE0004491	XP Furnace Elevator
EP99	CD99	CNV0004497	XP Bridge Conveyor
EP99	CD99	CNV0004492	Reversing XP Conveyor
EP99	CD99	CNVOOO4317	Incline XP Conveyor
EP99	CD99	CNV0004495	North XP Storage Discharge Conveyor
EP99	CD99	SCR0004311	North XP Screener
EP99	CD99	CNV0004315	South XP Storage Discharge Conveyor
EP99	CD99	SCR0004316	South XP Screener
EP99	CD99	CNV0004883	North Reversing Waste Screw Conveyor
EP99	CD99	CNV0004884	South Reversing Waste Screw Conveyor
EP99	CD99	CNV0004490	XP Fines Collection Transfer Conveyor
EP99	CD99	ELE0004484	XP Fines Loadout Elevator
EP99	CD99	BIN000XXXX	XP Fines Surge Bin
EP99	CD99	CNV0010284	XP Fines Dust Collector Screw Conveyor
EP99	CD99	POL0010277	XP Fines Dust Collector

- B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications.
- C. The baghouses 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.
- D. Replacement filters for the baghouses shall be kept 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).
- E. Nestle Purina PetCare Company - Golden Products Division shall 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.
- F. Nestle Purina PetCare Company - Golden Products Division shall maintain a copy of the baghouse manufacturer's performance warranty on site.
- G. Nestle Purina PetCare Company - Golden Products Division shall maintain an operating and maintenance log for the baghouses which shall

SPECIAL CONDITIONS:

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

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. Capture Device Requirements

A. Nestle Purina PetCare Company - Golden Products Division shall totally enclose all equipment listed under emission points EP71, EP72, EP88, EP90, EP91, EP92, EP93, EP94, EP95, EP96, EP97, EP98, and EP99 and vent the total enclosures to associated baghouses as specified in Table 2 and in the permit application.

B. A total enclosure is an enclosure that, with the exception of openings for material entry and exit, completely surrounds the emissions from an emission unit.

4. Control Device Requirement – Filters

A. Nestle Purina PetCare Company - Golden Products Division shall control emissions from the equipment listed in Table 3 using filters as specified in the permit application.

Table 3: Equipment Controlled by Filters

Emission Source	Equipment ID	Description
EP89	BIN0007649	Coater E/F Bentonite Filter Receiver - Aerated Bin Bottom
EP89	POL0007551	Coater E/F Bentonite Filter Receiver (EP for BIN7649)
EP89	SCA0007556	Coater 1E/2E Scale
EP89	POL0007557	Coater 1E/2E Scale Vent (EP for SCA7556)
EP89	SCA0007564	Coater 1F/2F Scale
EP89	POL0007565	Coater 1F/2F Scale Vent (EP for SCA7564)
EP89	POL0007238	LDEL Air Ladder Dust Collector
EP89	POL0007250	Lemonade Air Ladder Dust Collector
EP89	POL0007094	Bentonite Pulse Jet Filter Receiver 1/2A and 1/2B
EP89	POL0007112	Bentonite Pulse Jet Filter Receiver 3/4A and 3/4B
EP89	POL0007112	Bentonite Pulse Jet Filter Receiver 3/4A and 3/4B
EP100	POL0010270	Central Vacuum Filter Receiver
EP101	POL0010289	XP Fines Waste Filter Receiver
EP102	POL0010249	ORE Waste Fines Filter Receiver

B. The filters shall be operated and maintained in accordance with the manufacturer's specifications. A copy of the manufacturer's specifications shall be retained onsite.

SPECIAL CONDITIONS:

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

- C. Replacement filters shall be kept on hand at all times. The replacement 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. Nestle Purina PetCare Company - Golden Products Division shall visually assess the operation of each filter at least once every 24 hours while the emission sources are in operation. Nestle Purina PetCare Company - Golden Products Division shall record the results of each visual assessment. The presence of visible emissions shall be an indicator of filter malfunction. Nestle Purina PetCare Company - Golden Products Division shall replace any filter emitting visible emissions within eight hours.
 - E. Nestle Purina PetCare Company - Golden Products Division shall maintain an operating and maintenance log for the filters 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.
5. Record Keeping and Reporting Requirements
- A. Nestle 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.
 - B. Nestle Purina PetCare Company - Golden Products Division shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
6. Performance Testing
- A. Nestle Purina PetCare Company - Golden Products Division shall perform testing on all equipment subject to 40 CFR 60, Subpart OOO and Subpart UUU as specified in each subpart except as specified in Special Condition 6.B.
 - B. Nestle Purina PetCare Company - Golden Products Division shall perform testing on the hot and cold baghouses on two banks of the perlite expanders to demonstrate compliance, and determine an emission factor

SPECIAL CONDITIONS:

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

in lb PM₁₀ per ton throughput for each bank of the expander equipment.
The baghouses on the banks of perlite expander equipment are CD91/CD95 for expander 11, CD92/CD96 for expander 12, CD93/CD97 for expander 13, and CD94/CD98 for expander 14.

- C. Testing shall be performed at 90 to 100 percent of the equipment's maximum throughput rate listed in the application. If this cannot be achieved during the initial performance testing, the equipment's throughput rate shall be limited to the throughput rates achieved during testing. Nestle Purina Pet Care Company shall record the throughput rate achieved during testing. If throughput rates during operation increase above 110 percent of the rates achieved during testing, initial testing must be repeated at the higher rate. At no time shall the throughput rates during operation exceed the maximum throughput rate listed in the application.
- D. These tests shall be performed within 60 days after achieving the maximum production rate of the installation, but not later than 180 days after initial start-up for commercial operation.
- E. 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.
- F. One electronic copy of a written report of the performance test results shall be submitted to StackTesting@dnr.mo.gov within 60 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.
- G. 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.

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

Project Number: 2020-05-044
Installation ID Number: 207-0014
Permit Number:102020-005

Installation Address:

Nestle Purina PetCare Company -
Golden Products Division
22450 East State Highway Y
Bloomfield, MO 63825

Parent Company:

Nestle Purina PetCare Company
1 Checkerboard Square - 2B
St. Louis, MO 63102

Stoddard County, S28, T27N, R11E

REVIEW SUMMARY

- Nestle Purina PetCare Company - Golden Products Division has applied for authority to install additional coater equipment in their Low Density Engineered Litter manufacturing process that is currently under construction and the installation of four additional perlite expander systems within a new building expansion.
- The application was deemed complete on June 5, 2020.
- HAP emissions are expected from the combustion of natural gas in the proposed equipment. Individual HAP emissions are not expected to exceed their SMAL and combined HAP emissions are not expected to exceed de minimis levels.
- 40 CFR 60 Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants* applies to the equipment as indicated in Table 5. 40 CFR 60 Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries* applies to the equipment as indicated in Table 5.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- Total enclosures vented to baghouses, vent filters, and an enclosed building are being used to capture and control the particulate 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 PM₁₀ are conditioned below de minimis levels.
- This installation is located in Stoddard County, an attainment/unclassifiable 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.
- Emissions testing is required for the equipment subject to NSPS OOO and UUU as a part of this permit. Testing may be required as part of other state, federal or applicable rules.
- Submittal of an update to the installation's Intermediate Operating Permit application is required for this installation within 90 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Nestle Purina PetCare Company - Golden Products Division operates a facility in Bloomfield, Missouri that manufacturers absorbent materials for pets. The facility mines and processes clay to produce the absorbent materials, such as kitty litter. The facility also processes bentonite and perlite in manufacturing Low Density Engineered Litter (LDEL). The facility is adding a new process (referred to as Lemonade) that produces LDEL using perlite fines/dust, a previously unusable byproduct of LDEL production. Nestle Purina PetCare Company - Golden Products Division is a minor source for construction permitting and has applied for an Intermediate Operating Permit, which has been assigned project number 2017-12-015.

The following NSR permits have been issued to Nestle Purina PetCare Company - Golden Products Division from the Air Pollution Control Program.

Table 4: NSR Permit History

Permit Number	Description
1093-013	Installation of a dust collector
1094-012	Installation of a bagging system
0195-004	Installation of various processing and handling equipment
0495-004	Installation of various processing and handling equipment
0995-009	Installation of a transfer system and unloading station
0396-027	Modification of pneumatic conveyor system
1296-005	Modification of rotary dryer control system
1199-006	Modification of conventional processing area and upgrade of aspirator system
072000-010	Installation of a fines recovery system
032001-014	Installation of a silica gel packaging line and modification of clumping process
052001-025	Replacement of rotary dryer and associated equipment
082002-018	Reopening of surface clay mine at Avert Mine site
032004-013	Installation of equipment for clay fines recycling

Permit Number	Description
052005-009	Installation of equipment to Reconstituted Clay Process
072005-046	Increase of mill area throughput to 125 tons per hour
102011-009	Installation of a dryer and associated equipment
102011-009A	Correction to monitoring requirements
102011-009B	Removal of KP Dust Cyclone from the gas stream treatment equipment
042013-012	Installation of equipment for the production of lightweight litter from perlite
032013-009	Temporary permit for lightweight litter production pilot program
112013-004	Installation of equipment for the production of lightweight litter from perlite
012014-004	Installation of equipment for the production of lightweight litter from perlite
032015-010	Installation of equipment for the production of lightweight litter from perlite
042015-008	As-built update to Construction Permit No. 012014-004
042015-008A	Increase in lightweight litter production capacity
012019-001	Installation of two new production lines for lightweight litter from perlite
012019-007	Installation and relocation of equipment within the clumping process
022020-004	A plant expansion for the manufacturer of LDEL from both popped perlite granules and perlite fines
012019-001A	As-built update to Construction Permit No. 012014-001

PROJECT DESCRIPTION

Nestle Purina PetCare Company - Golden Products Division is proposing to install equipment to increase the production of Low Density Engineered Litter (LDEL). The project consists of the installation of additional coater equipment to the LDEL manufacturing process that is under construction in accordance with construction permit 022020-004 and the installation of four additional perlite expander systems within a new building expansion to the south of the existing ten perlite expanders.

The Additional Coaters:

- Two pairs of coaters (1E/2E and 1F/2F) and supporting bins, conveyors and filter receivers will be installed to increase the production capacity of the newly constructed equipment installed under construction permit 022020-004. Output from the new equipment will feed the existing LDEL dryer listed as EP85 and the related blending/additives/packaging systems listed in EP82. Fines from the new equipment will be directed to the Lemonade (perlite fines reuse) system. These previously permitted emission points will not have their PTE increased from these modifications. When permitted the emission point PTE was calculated at the maximum production capacity, this new construction project will not allow that maximum production capacity to increase. Aspiration from the new process equipment will be directed to a new baghouse unit at EP88. Individual filter receiver units and scale vents with outdoor exhausts are grouped to new EP89.

The Additional Perlite Expanders:

- Four perlite expander systems (Expanders 11-14) will be installed to provide the increased demand for expanded perlite resulting from the additional coaters. A

new building addition will be constructed south of the existing perlite expander building to house the perlite expander systems. The project includes additional outdoor perlite ore conveyors, elevators, and bins that are aspirated to a new baghouse control unit (EP90). Each furnace system consists of a perlite expander and separator controlled by a hot-side baghouse (EP91 thru EP94) as well as a cold side baghouse (EP95 thru EP98). Expander perlite screening for each expander as well as belt conveyors to the existing storage bins and are aspirated to a new baghouse unit (EP99). Housekeeping inside the new building will be facilitated with a new central vacuum filter receiver (EP100). Expanded Perlite fines from baghouses EP91 thru EP99 will be pneumatically conveyed to a new XP filter receiver (EP101). Perlite ore waste from the EP90 baghouse will be pneumatically conveyed to new filter receiver (EP102).

Additional Equipment to Existing Emission Points:

- Additional transfer equipment is being added to existing emission points EP71 and EP72 to transfer perlite to the new systems. The additional equipment changes the route of perlite but does not increase the overall transfer rates or remove bottlenecks for the process. Emission at the maximum design rate for perlite conveyance within EP71 and EP72 were previously accounted for and no additional emissions are expected from the added equipment.

Nestle Purina PetCare Company - Golden Products Division requested that project PTE from previously issued construction permit 022020-004 and the PTE for this new project be combined and for the Air Pollution Control Program to forgo a formal project aggregation determination. Since this is the most conservative option and Nestle Purina PetCare Company - Golden Products Division requested a 15.0 tpy PM₁₀ limit the projects were combined for potential emission calculation purposes with no formal determination of project aggregation. Equipment of this permit application are listed in Table 5 and equipment included in the 15.0 tpy PM₁₀ limit are listed in Table 6.

Table 5: Equipment Summary from the Application

Emissions Point	Equipment ID	Description	NSPS
EP71	CNV0010261	XP Furnace Elevator Feeder 1	000
EP71	CNV0010260	XP Collector Surge Bin	000
EP72	CNV0010263	XP Furnace Elevator Feeder 2	000
EP72	ELV0010264	XP Furnace Elevator 2	000
EP88	CNV0007512	Coater E-F Feed Conveyor	000
EP88	BIN0007513	Coater 1E-2E Surge Bin	000
EP88	CNV0007514	Coater 1E-2E Feed Conveyor	000
EP88	BSC0007572	Coater 1E-2E Belt Scale	000
EP88	CNV0007517	Coater 1E-2E Feed Conveyor	000
EP88	BIN0007518	Coater 1F-2F Surge Bin	000
EP88	CNV0007531	Coater 1F-2F Feed Conveyor	000
EP88	BSC0007573	Coater 1F-2F Belt Scale	000
EP88	CNV0007534	Coater 1F-2F Feed Conveyor	000

Emissions Point	Equipment ID	Description	NSPS
EP88	CNV0007553	Bentonite Airslide to Coater 1E-2E	000
EP88	MIX0007519	Coater 2E	000
EP88	CNV0007524	Coater 2E Discharge Conveyor	000
EP88	MIX0007525	Coater 1E	000
EP88	CNV0007530	Coater 1E Discharge Conveyor	000
EP88	CNV0007561	Bentonite Airslide to Coater 1F-2F	000
EP88	MIX0007535	Coater 2F	000
EP88	CNV0007540	Coater 2F Discharge Conveyor	000
EP88	MIX0007541	Coater 1F	000
EP88	CNV0007546	Coater 1F Discharge Conveyor	000
EP88	POL0007163	Coater E-F Baghouse	000
EP89	BIN0007649	Coater E/F Bentonite Filter Receiver - Aerated Bin Bottom	000
EP89	POL0007551	Coater E/F Bentonite Filter Receiver (EP for BIN7649)	000
EP89	SCA0007556	Coater 1E/2E Scale	N/A
EP89	POL0007557	Coater 1E/2E Scale Vent (EP for SCA7556)	N/A
EP89	SCA0007564	Coater 1F/2F Scale	N/A
EP89	POL0007565	Coater 1F/2F Scale Vent (EP for SCA7564)	N/A
EP89	POL0007238	LDEL Air Ladder Dust Collector	N/A
EP89	POL0007250	Lemonade Air Ladder Dust Collector	N/A
EP89	POL0007094	Bentonite Pulse Jet Filter Receiver 1/2A and 1/2B	N/A
EP89	POL0007112	Bentonite Pulse Jet Filter Receiver 3/4A and 3/4B	N/A
EP89	POL0007112	Bentonite Pulse Jet Filter Receiver 3/4A and 3/4B	N/A
EP90	CNV0010001	Ore Transfer Conveyor 1	000
EP90	BSC0010002	Ore Transfer Conveyor 1 Belt Scale	000
EP90	CNV0010003	Ore Transfer Conveyor 2	000
EP90	CNV0010004	Ore Transfer Conveyor 3	000
EP90	CNV0010005	Ore Reversing Conveyor	000
EP90	BIN0010006	Ore Bin South	000
EP90	BIN0010009	Ore Bin North	000
EP90	CNV0010012	Ore Reversing Feeder Conveyor	000
EP90	BSC0010013	Ore Reversing Feeder Conveyor Belt Scale	000
EP90	SCR0010014	Ore Screener	000
EP90	ELV0010017	Ore Elevator	000
EP90	BIN0010018	Ore Surge Hopper	000
EP90	CNV0010020	Ore Shuttle Supply Weighbelt Feeder	000
EP90	CNV00010021	Ore Shuttle Feeder	000
EP90	BIN0010030	Ore Surge Bin #11	000
EP90	CNV0010034	Ore Weighbelt Feeder	000
EP90	BIN0010036	Ore Hopper	000
EP90	CNV0010038	Ore Furnace #11 Feed Reversing Conveyor	000

Emissions Point	Equipment ID	Description	NSPS
EP90	BIN0010080	Ore Surge Bin #12	OOO
EP90	CNV0010084	Ore Weighbelt Feeder	OOO
EP90	BIN0010086	Ore Hopper	OOO
EP90	CNV0010088	Ore Furnace #12 Feed Reversing Conveyor	OOO
EP90	BIN0010130	Ore Surge Bin #13	OOO
EP90	CNV0010134	Ore Weighbelt Feeder	OOO
EP90	BIN0010136	Ore Hopper	OOO
EP90	CNV0010138	Ore Furnace #13 Feed Reversing Conveyor	OOO
EP90	BIN0010180	Ore Surge Bin #14	OOO
EP90	CNV0010184	Ore Weighbelt Feeder	OOO
EP90	BIN0010186	Ore Hopper	OOO
EP90	CNV0010188	Ore Furnace #14 Feed Reversing Conveyor	OOO
EP90	BIN0010235	Ore Fines Surge Bin	OOO
EP90	BIN0010235	ORE FINES SURGE BIN From ORE SCREENER	OOO
EP90	POL0010237	Ore Fines Dust Collector	OOO
EP90	CNV0010244	Ore Fines Dust Collector Screw Conveyor	N/A
EP91	FUR0010042	Expander Furnace	UUU
EP91	SEP0010048	XP Separator	OOO
EP91	POL0010051	High Temperature Fines Baghouse	N/A
EP92	FUR0010092	Expander Furnace	UUU
EP92	SEP0010098	XP Separator	OOO
EP92	POL0010101	High Temperature Fines Baghouse	N/A
EP93	FUR0010142	Expander Furnace	UUU
EP93	SEP0010148	XP Separator	OOO
EP93	POL0010151	High Temperature Fines Baghouse	N/A
EP94	FUR0010192	Expander Furnace	UUU
EP94	SEP0010198	XP Separator	OOO
EP94	POL0010201	High Temperature Fines Baghouse	N/A
EP95	POL0010059	Furnace Process Line 11 - XP Receiver	N/A
EP96	POL0010109	Furnace Process Line 12 - XP Receiver	N/A
EP97	POL0010159	Furnace Process Line 13 - XP Receiver	N/A
EP98	POL0010209	Furnace Process Line 14 - XP Receiver	N/A
EP99	SCR0010068	XP Screener #11	OOO
EP99	DIV0010072	XP Screener #11 Diverter	N/A
EP99	BIN0010075	XP Hopper #11	OOO
EP99	CNV0010076	XP Weighbelt Feeder #11	OOO
EP99	SCR0010118	XP Screener #12	OOO
EP99	DIV0010072	XP Screener #12 Diverter	N/A
EP99	BIN0010125	XP Hopper #12	OOO
EP99	CNV0010126	XP Weighbelt Feeder #12	OOO
EP99	SCR0010168	XP Screener #13	OOO

Emissions Point	Equipment ID	Description	NSPS
EP99	DIV0010072	XP Screener #13 Diverter	N/A
EP99	BIN0010175	XP Hopper #13	000
EP99	CNV0010176	XP Weighbelt Feeder #13	000
EP99	SCR0010218	XP Screener #14	000
EP99	DIV0010072	XP Screener #14 Diverter	N/A
EP99	BIN0010225	XP Hopper #14	000
EP99	CNV0010226	XP Weighbelt Feeder #14	000
EP99	CNV0004490	XP Collection Conveyor	000
EP99	ELE0004491	XP Furnace Elevator	000
EP99	CNV0004497	XP Bridge Conveyor	000
EP99	CNV0004492	Reversing XP Conveyor	000
EP99	CNVOOO4317	Incline XP Conveyor	000
EP99	CNV0004495	North XP Storage Discharge Conveyor	000
EP99	SCR0004311	North XP Screener	000
EP99	CNV0004315	South XP Storage Discharge Conveyor	000
EP99	SCR0004316	South XP Screener	000
EP99	CNV0004883	North Reversing Waste Screw Conveyor	N/A
EP99	CNV0004884	South Reversing Waste Screw Conveyor	N/A
EP99	CNV0004490	XP Fines Collection Transfer Conveyor	000
EP99	ELE0004484	XP Fines Loadout Elevator	000
EP99	BIN000XXXX	XP Fines Surge Bin	000
EP99	CNV0010284	XP Fines Dust Collector Screw Conveyor	000
EP99	POL0010277	XP Fines Dust Collector	000
EP100	POL0010270	Central Vacuum Filter Receiver	N/A
EP101	POL0010289	XP Fines Waste Filter Receiver	000
EP102	POL0010249	Ore Waste Fines Filter Receiver	000

N/A = Not Applicable

Table 6: Equipment Summary for the 15.0 tpy PM₁₀ Limit

Emissions Point	Equipment ID	Description
EP14a	BSC0010300	C&M Scale 20/50 – Section 2
EP14a	BSC0010100	C&M Scale – South Bentonite
EP14a	BSC0010200	C&M Scale 20/50 – Bin 3
EP14a	CNV0S10200	Conveyor – Section 1 (108)
EP14a	CNV0S10500	Conveyor – Section 1 (109)
EP14a	ELE0S10100	Elevator – Section 1 (09)
EP14a	CNV0002599	Product Conveyor – Section 1
EP14a	ELE0S10200	North Elevator – Section 1 (15)
EP14a	BSC0001730	Bentonite Unloading Scale
EP14a	BIN0003000	300 Ton Bin
EP14a	BIN0003100	200 Ton North Bin

Emissions Point	Equipment ID	Description
EP14a	BIN0003200	200 Ton South Bin
EP14a	BSC0020100	C&M Scale – South Bentonite
EP14a	CNV0520700	Conveyor – Section 2 (146)
EP14a	ELE0S20300	Elevator – Section 2 (16)
EP14a	CNV0002594	Product Conveyor – Section 2
EP14a	ELE0S20400	Elevator – Section 2 (14)
EP14a	BIN0001976	Package Line 6 Bin
EP14a	BIN0001700	Package Line 7 Bin
EP14a	BIN0001800	Package Line 8 Bin
EP14a	BIN0001900	Package Line 9 Bin
EP14a	CNV0002779	Finished Product Conveyor
EP14a	CNV0002768	Bin Feed Conveyor
EP14a	BIN0003566	Blue Additive Storage Bin
EP14a	BIN0003561	Green Additive Storage Bin
EP14a	BSC0003565	Weigh Belt Feeder Scale
EP14a	BSC0003570	Weigh Belt Feeder Scale
EP14a	BIN0002769	Storage Bin
EP14a	CNV0003525	Finished Product Conveyor
EP14a	ELE0003527	Bucket Elevator
EP14a	CNV0003530	Clod Steering Conveyor
EP14a	CNV0003536	Clod Steering Conveyor
EP14a	CNV0003537	Liquid Additive Conveyor
EP14a	CNV0003549	Application Conveyor
EP14a	ELE0003572	Bucket Elevator
EP14a	BSC0003628	Belt Scale Conveyor
EP14a	BSC0003629	Belt Scale Conveyor
EP14a	BSC0002770	Belt Scale from Bin 2769
EP14a	CNV0002773	Bin Transfer Conveyor
EP14a	CNV0003063	Bin Transfer Conveyor
EP14a	CNV0003061	Transfer Conveyor
EP14a	BSC0003062	Belt Scale for Conveyor 3061
EP14a	BIN0001047	Silica Bins
EP14a	BSC0001383	Silica Gel Scale
EP14a	BIN0003029	Zeolite Storage Bin
EP14a	POL0002964	Zeolite Bin Vent
EP14a	POL0001532	Clumping Baghouse
EP14a	POL0001533	Clumping Baghouse
EP14a	FAN0001527	Exhaust Fan
EP14a	BSC0003064	Bin Conveyor
EP14a	CNV0004059	Clumping Conveyor – Building 6
EP14a	BLD0000700	Packaging Building

Emissions Point	Equipment ID	Description
EP14b	LAD0S10100	Air Ladder – Section 1
EP14b	LAD0S20100	Air Ladder – Section 2
EP14b	LAD0003531	Air Ladder – Section 3
EP14b	SCA0001975	Jug Packaging Line 6
EP14b	SCA0000159	Pail Packaging Line 7
EP14b	SCA0000800	Jug Line 8
EP14b	SCA0000900	Bag in Box Line 9
EP14b	BSC0010400	C&M Scale – North Bentonite
EP14b	CNVREC0300	Bentonite Bag Unloading Conveyor
EP14b	CNVREC0100	Unload Pit Conveyor
EP14b	ELEREC0100	Bentonite Pit Elevator
EP14b	CNV0001577	Bentonite Unloading Conveyor
EP14b	CNV0001057	Bentonite Unloading Conveyor
EP14b	CNV0001058	Bentonite Unloading Conveyor
EP14b	CNV0S10100	Conveyor – Section 1 (160)
EP14b	ELE0001059	Bulk Bentonite Elevator
EP14b	BLW0002893	Reclaim Blower Line 6
EP14b	BIN0002893	Reclaim Bin Line 6
EP14b	BLW0001517	Reclaim Blower Line 8
EP14b	BIN0001515	Reclaim Bin Line 8
EP14b	BLW0002896	Reclaim Blower Line 9
EP14b	BIN0003046	Reclaim Bin Line 9
EP14b	BAG0002960	Bulk Zeolite Bag Unloading
EP14b	BAG0003014	Bulk Power Pieces Bag Unloading
EP14b	BSC0020200	C&M Scale – North Bentonite
EP14b	BAG0001371	Bulk Crystal Blend Unloading
EP14b	POW0002475	Fresh Fabric Receiver – Section 1
EP14b	POW00002476	Instant Action Receiver – Section 1
EP14b	POW0002227	Scamp Receiver – Section 1
EP14b	POW0003048	Zeolite Receiver – Section 1
EP14b	POW0S10100	Fresh Fabric Feeder – Section 1
EP14b	POW0S10200	Instant Action Feeder – Section 1
EP14b	POW0002228	Scamp Feeder – Section 1
EP14b	POW0003047	Zeolite Feeder – Section 1
EP14b	POW0003050	Zeolite Receiver – Section 2
EP14b	POW0002229	Power Pieces Receiver – Section 2
EP14b	POW0003049	Zeolite Feeder – Section 2
EP14b	POW0S20100	Fresh Fabric Feeder – Section 2
EP14b	POW0S20200	Purple Zeolite Feeder – Section 2
EP14b	POW0S20300	Instant Action Feeder – Section 2
EP14b	POW0002230	Power Pieces Feeder – Section 2

Emissions Point	Equipment ID	Description
EP14b	BLW0002958	Power Pieces/Zeolite Blower
EP14b	BLW0002962	Zeolite Blower
EP14b	ROT0002963	Zeolite Bag Airlock
EP14b	ROT0003036	Airlock for Bin 3029
EP14b	ROT0003528	Rotary Feeder for Elevator 3527
EP14b	ROT0003529	Rotary Feeder for Elevator 3527
EP32	BIN0003845	Fines Storage Bin
EP32	POL0003733	Filter Receiver (Raw Material)
EP32	CNV0003989	Fines Load-Out Bin Screw Conveyor
EP32	POL0003996	Filter Receiver (Perlite Fines Loadout)
EP32	POL0004535	Filter Receiver (XP Perlite Baghouse)
EP32	POL0004532	Filter Receiver (XP Surge Bins 1-5)
EP32	POL0004538	Filter Receiver (XP Surge Bins 6-10)
EP32	POL0003842	Filter Receiver (Overs/Fines)
EP38	CNV0000920	Bin Conveyor
EP38	CNV0003522	Bin Conveyor
EP38	CNV0002599	Product Conveyor – Section 1
EP38	ELE0S10200	North Elevator – Section 1 (15)
EP38	BIN0003100	200 Ton North Bin
EP38	BIN0003200	200 Ton South Bin
EP38	CNV0002594	Product Conveyor – Section 2
EP38	ELE0S20400	Elevator – Section 2 (14)
EP38	CNV0002779	Finished Product Conveyor
EP38	CNV0002768	Bin Feed Conveyor
EP38	CNV0003525	Finished Product Conveyor
EP38	ELE0003527	Bucket Elevator
EP38	CNV0003537	Liquid Additive Conveyor
EP38	ELE0003572	Bucket Elevator
EP38	CNV0002773	Bin Transfer Conveyor
EP38	CNV0004059	Clumping Conveyor – Building 6
EP38	LAD0S10100	Air Ladder – Section 1
EP38	POL0005291	Clumping Baghouse
EP58	DRY0004755	Ore Preheater
EP58	DRY0004754	Expander Furnace
EP58	POL0004756	Perlite Separator
EP58	POL0004764	High Temperature Fines Baghouse
EP59	DRY0004855	Ore Preheater
EP59	DRY0004854	Expander Furnace
EP59	POL0004856	Perlite Separator
EP59	POL0004864	High Temperature Fines Baghouse
EP68	POL0004761	Expander Furnace 9 - XP Receiver (Cool Baghouse)

Emissions Point	Equipment ID	Description
EP69	POL0004861	Expander Furnace 10 - XP Receiver (Cool Baghouse)
EP70	CNV0004433	Incline Unloading Belt
EP70	CNV0004436	Ore Reversing Conveyor
EP70	BIN0004437	South Ore Bin
EP70	BIN0004441	North Ore Bin
EP70	CNV0004440	Reversing Belt Feeder
EP70	-	Truck Loading Station
EP70	SCR0004444	Screener
EP70	ELE0004484	Bank Ore Elevator
EP70	BIN0004541	Ore Fines Surge Bin
EP70	BIN0004389	Fines Transfer Bin
EP70	POL0004590	Ore Loadout
EP70	BIN0004448	Surge Hopper
EP70	CNV0004483	Ore Shuttle Supply Weighbelt
EP70	CNV0004485	Bank Shuttle Conveyor
EP70	BIN0004401	Ore Surge Bin #1
EP70	BIN0004501	Ore Surge Bin #2
EP70	BIN0004601	Ore Surge Bin #3
EP70	BIN0004701	Ore Surge Bin #4
EP70	BIN0004801	Ore Surge Bin #5
EP70	BIN0004451	Ore Surge Bin #6
EP70	BIN0004551	Ore Surge Bin #7
EP70	BIN0004651	Ore Surge Bin #8
EP70	BIN0004751	Ore Surge Bin #9
EP70	BIN0004851	Ore Surge Bin #10
EP70	BSC0004402	Ore Weighbelt #1
EP70	BSC0004502	Ore Weighbelt #2
EP70	BSC0004602	Ore Weighbelt #3
EP70	BSC0004702	Ore Weighbelt #4
EP70	BSC0004802	Ore Weighbelt #5
EP70	BSC0004452	Ore Weighbelt #6
EP70	BSC0004552	Ore Weighbelt #7
EP70	BSC0004652	Ore Weighbelt #8
EP70	BSC0004752	Ore Weighbelt #9
EP70	BSC0004852	Ore Weighbelt #10
EP70	CNV0004633	Screw Conveyor
EP70	POL0004632	Ore Aspiration Baghouse
EP71	SCR0004409	XP Screener #1
EP71	SCR0004509	XP Screener #2
EP71	SCR0004609	XP Screener #3
EP71	BIN0004416	XP Hopper for System #1

Emissions Point	Equipment ID	Description
EP71	BSC0004425	Fines Weigh Belt Conveyor
EP71	BIN0004417	XP Hopper #1
EP71	BIN0004517	XP Hopper #2
EP71	BIN0004617	XP Hopper #3
EP71	BSC0004418	XP Furnace Reversing Weighbelt #1
EP71	BSC0004518	XP Furnace Reversing Weighbelt #2
EP71	BSC0004618	XP Furnace Reversing Weighbelt #3
EP71	BIN0004416	Expanded Perlite Fines Surge Bin #1
EP71	BIN0004516	Expanded Perlite Fines Surge Bin #2
EP71	BIN0004616	Expanded Perlite Fines Surge Bin #3
EP71	CNV0004490	Collection Conveyor
EP71	ELE0004491	XP Elevator
EP71	ELE0004496	XP Bin Elevator
EP71	CNV0004497	Bridge Conveyor (From Bridge Tail End Pick-Up) - South
EP71	CNV0004495	West Storage Discharge Conveyor
EP71	SCR0004311	Screener (after storage discharge cnv)
EP71	CNV0004315	Storage Discharge Conveyor 2
EP71	SCR0004316	Screener (after storage discharge cnv)
EP71	CNV0004492	Reversing XP Conveyor
EP71	CNV0004317	XP Conveyor from existing railcar
EP71	CNV0004318	XP Conveyor
EP71	CNV0010261	XP Furnace Elevator Feeder 1
EP71	CNV0010260	XP Collector Surge Bin
EP71	CNV0004682	Screw Conveyor
EP71	POL0004648	Expanded Ore Aspiration Baghouse 1
EP72	SCR0004709	XP Screener #4
EP72	SCR0004809	XP Screener #5
EP72	SCR0004459	XP Screener #6
EP72	BIN0004717	XP Hopper #4
EP72	BIN0004817	XP Hopper #5
EP72	BIN0004467	XP Hopper #6
EP72	BSC0004718	XP Furnace Reversing Weighbelt #4
EP72	BSC0004818	XP Furnace Reversing Weighbelt #5
EP72	BSC0004468	XP Furnace Reversing Weighbelt #6
EP72	BIN0004716	Expanded Perlite Fines Surge Bin #4
EP72	BIN0004816	Expanded Perlite Fines Surge Bin #5
EP72	BIN0004466	Expanded Perlite Fines Surge Bin #6
EP72	CNV0004490	Collection Conveyor
EP72	CNV0004642	Screw Conveyor
EP72	CNV0010263	XP Furnace Elevator Feeder 2

Emissions Point	Equipment ID	Description
EP72	ELV0010264	XP Furnace Elevator 2
EP72	POL0004641	Expanded Ore Aspiration Baghouse 2
EP73	POL0004543	Filter Receiver (Ore Baghouse Material)
EP73	BIN0004389	Hopper 4389
EP73	POL0004590	Truck Loadout
EP73	BLW0004639	Blower
EP74	POL004691	Central Vacuum System Filter Receiver
EP75	BIN0004584	Hopper 4574
EP75	CNV0004883	North Reversing Waste Belt Conveyor 4883
EP75	CNV0004884	South Reversing Waste Belt Conveyor 4884
EP75	BIN0004203	Surge Bin/Diverter 4203
EP75	CNV0004202	Belt Conveyor 4202 (PickUp) - South
EP75	CNV0004200	Belt Conveyor 4200 (PickUp) - South
EP75	POL0004493	North XP Storage Bin Vent 4493-Bin Vent
EP75	POL0004313	South XP Storage Bin Vent 4313-Bin Vent
EP80	POL0007606	Lemonade Area Baghouse
EP80	BSC0007192	Perlite Fines Weigh Belt; 10,000 pounds per hour
EP80	BSC0007208	Wet Fines Belt Conveyor with Belt Scale
EP80	BSC0007210	Wet Overs Belt Conveyor with Belt Scale
EP80	BSC0007213	Dryer Feed Weigh Belt
EP80	BSC0007224	Lemonade Overs/Fines Weigh Belt
EP80	BSC0007227	Lemonade Weigh Belt
EP80	CNV0007638	Waste Belt Conveyor before Dryer
EP80	ELE0007204	Elevator Between Compactor & Crusher Bot
EP80	ELE0007228	Lemonade Elevator to Storage Bin 7235
EP80	SCR0007206	Wet Screener
EP80	SCR0007223	Dry Screener
EP81	BIN0007007	Perlite Surge Bin
EP81	BIN0007049	Perlite Surge Bin
EP81	BSC0007008	Perlite Belt Scale Prior to Enrober #1
EP81	BSC0007014	Coater 1A/2A Belt Scale
EP81	BSC0007032	Coater 1B/2B Belt Scale
EP81	BSC0007050	Perlite Belt Scale Prior to Enrober #2
EP81	BSC0007056	Coater 1C/2C Belt Scale
EP81	BSC0007073	Coater 1D/2D Belt Scale
EP81	BSC0007145	LDEL Overs/Fines Belt Scale
EP81	BSC0007147	LDEL Scale Belt Conveyor
EP81	CNV0007011	Coater A/B Feed Reversing Belt Conveyor
EP81	CNV0007013	Coater 1A/2A Feed Storeveyor Belt Conveyor
EP81	CNV0007017	Coater 1A/2A Reversing Feed Belt Conveyor
EP81	CNV0007023	Coater 2A Discharge Reversing Belt Conveyor

Emissions Point	Equipment ID	Description
EP81	CNV0007029	Coater 1A Discharge Reversing Belt Conveyor
EP81	CNV0007031	Coater 1B/2B Feed Storeveyor Belt Conveyor
EP81	CNV0007035	Coater 1B/2B Reversing Feed Belt Conveyor
EP81	CNV0007041	Coater 2B Discharge Reversing Belt Conveyor
EP81	CNV0007047	Coater 1B Discharge Reversing Belt Conveyor
EP81	CNV0007053	Coater C/D Feed Reversing Belt Conveyor
EP81	CNV0007055	Coater 1C/2C Feed Storeover Belt Conveyor
EP81	CNV0007058	Coater 1C/2C Reversing Feed Belt Conveyor
EP81	CNV0007064	Coater 2C Discharge Reversing Belt Conveyor
EP81	CNV0007070	Coater 1C Discharge Reversing Belt Conveyor
EP81	CNV0007072	Coater 1D/2D Feed Storeover Belt Conveyor
EP81	CNV0007075	Coater 1D/2D Reversing Feed Belt Conveyor
EP81	CNV0007081	Coater 2D Discharge Reversing Belt Conveyor
EP81	CNV0007087	Coater 1D Discharge Reversing Belt Conveyor
EP81	CNV0007096	Bentonite Airslide Conveyor to 1A/2A
EP81	CNV0007104	Bentonite Airslide Conveyor to 1B/2B
EP81	CNV0007114	Bentonite Airslide Conveyor to 1C/2C
EP81	CNV0007122	Bentonite Airslide Conveyor to 1D/2D
EP81	CNV0007131	Coaters A-F LDEL Transfer Belt Conveyor
EP81	CNV0007132	LDEL Inclined Belt Conveyor from CNV7131
EP81	CNV0007133	LDEL Inclined Belt Conveyor from CNV7132
EP81	CNV0007134	LDEL Belt Conveyor from CNV7133
EP81	CNV0007136	LDEL Dryer Storeveyor Belt Conveyor
EP81	CNV0007166	Compacted and Non-Compacted Waste Belt Conveyor
EP81	CNV0007167	Waste Belt Conveyor (Lemonade and LDEL)
EP81	CNV0007244	Lemonade / Enrober A Waste Belt Conveyor
EP81	CNV0007633	LDEL Product Inline Belt Conveyor
EP81	ELE0007150	Elevator Bottom
EP81	ELE0007632	Elevator to Bin 7632 top
EP81	MIX0007010	Perlite Enrober #1
EP81	MIX0007018	2A Coater
EP81	MIX0007024	1A Coater
EP81	MIX0007036	2B Coater
EP81	MIX0007042	1B Coater
EP81	MIX0007052	Perlite Enrober #2
EP81	MIX0007059	2C Coater
EP81	MIX0007065	1C Coater
EP81	MIX0007076	2D Coater
EP81	MIX0007082	1D Coater
EP81	POL0007163	LDEL Area Baghouse
EP81	SCR0007143	Screener

Emissions Point	Equipment ID	Description
EP82	0	Jug Line Scale Filler
EP82	0	Combo Line Scale Filler
EP82	BIN0007415	Jug Line Surge Bin
EP82	BIN0007467	Combo Line Surge Bin
EP82	BSC0007291	Product Weigh Belt Feeder from Enrober A
EP82	BSC0007292	Product Weigh Belt Feeder from Enrober B
EP82	CNV0007256	Clod Screener
EP82	CNV0007258	Clod Screener
EP82	CNV0007260	Clod Screener
EP82	CNV0007293	Jug Line Additive Belt Conveyor Cover
EP82	CNV0007294	Clod Screener Conveyor
EP82	CNV0007295	Combo Line Additive Belt Conveyor Discharge
EP82	CNV0007296	Clod Screener Conveyor
EP82	CNV0007297	Jug Line Transfer Conveyor - Incline
EP82	CNV0007298	Combo Line Transfer Conveyor - Incline
EP82	ELE0007253	Elevator Top
EP82	ELE0007255	Elevator Top
EP82	ELE0007257	Elevator Top
EP82	ELE0007259	Elevator Top
EP82	ELE0007263	Elevator Top to Jug Line
EP82	ELE0007265	Elevator Top to Combo Line
EP82	FST0007580	Feed Hopper
EP82	FST0007582	Feed Hopper
EP82	FST0007584	Feed Hopper
EP82	FST0007586	Feed Hopper
EP82	FST0007588	Feed Hopper
EP82	FST0007589	Feed Hopper
EP82	NA	Powder Additives Hood
EP82	NA	Waste Truck Hood A
EP82	NA	Waste Truck Hood B
EP82	POL0007611	Blending/Additives/Packaging Baghouse
EP83	POL0007094	Bentonite - Coaters 1A/2A and 1B/2B Filter Receiver
EP83	POL0007100	Coater 1A/2A Scale Vent
EP83	POL0007108	Coater 1B/2B Scale Vent
EP83	POL0007112	Bentonite - Coaters 1C/2C and 1D/2D Filter Receiver
EP83	POL0007118	Coater 1C/2C Scale Vent
EP83	POL0007126	Coater 1D/2D Scale Vent
EP83	POL0007146	Perlite Fines Weigh Belt Infeed Hopper Bin Vent
EP83	POL0007170	Starch Storage Bin Vent Filter with Blow-Out Panels
EP83	POL0007190	Perlite Fines Filter Receiver
EP83	POL0007238	Round Filter - LDEL Air Ladders

Emissions Point	Equipment ID	Description
EP83	POL0007250	Round Filter - Lemonade Air Ladders
EP83	POL0007320	Silica Gel Bulk Bag Unloading Station Bin Vent
EP83	POL0007590	Powder A Filter Receiver - Jug Line
EP83	POL0007591	Powder B Filter Receiver - Jug Line
EP83	POL0007592	Activated Carbon Bulk Bag Unloading Station Bin Vent
EP83	POL0007602	Powder A Filter Receiver - Combo Line
EP83	POL0007603	Powder B Filter Receiver - Combo Line
EP83	POL0007625	Activated Carbon Bin Vent Filter
EP84	POL0007226	Lemonade Dryer Baghouse
EP85	POL0007154	LDEL Dryer Baghouse
EP86	EDR000XXXX	Lemonade and LDEL Emergency Generator
EP87	POL0007091	Bentonite Storage Bin Vent filter
EP87	POL0007185	Perlite Fines Storage Bin Vent
EP88	CNV0007512	Coater E-F Feed Conveyor
EP88	BIN0007513	Coater 1E-2E Surge Bin
EP88	CNV0007514	Coater 1E-2E Feed Conveyor
EP88	BSC0007572	Coater 1E-2E Belt Scale
EP88	CNV0007517	Coater 1E-2E Feed Conveyor
EP88	BIN0007518	Coater 1F-2F Surge Bin
EP88	CNV0007531	Coater 1F-2F Feed Conveyor
EP88	BSC0007573	Coater 1F-2F Belt Scale
EP88	CNV0007534	Coater 1F-2F Feed Conveyor
EP88	CNV0007553	Bentonite Airslide to Coater 1E-2E
EP88	MIX0007519	Coater 2E
EP88	CNV0007524	Coater 2E Discharge Conveyor
EP88	MIX0007525	Coater 1E
EP88	CNV0007530	Coater 1E Discharge Conveyor
EP88	CNV0007561	Bentonite Airslide to Coater 1F-2F
EP88	MIX0007535	Coater 2F
EP88	CNV0007540	Coater 2F Discharge Conveyor
EP88	MIX0007541	Coater 1F
EP88	CNV0007546	Coater 1F Discharge Conveyor
EP88	POL0007163	Coater E-F Baghouse
EP89	BIN0007649	Coater E/F Bentonite Filter Receiver - Aerated Bin Bottom
EP89	POL0007551	Coater E/F Bentonite Filter Receiver (EP for BIN7649)
EP89	SCA0007556	Coater 1E/2E Scale
EP89	POL0007557	Coater 1E/2E Scale Vent (EP for SCA7556)
EP89	SCA0007564	Coater 1F/2F Scale
EP89	POL0007565	Coater 1F/2F Scale Vent (EP for SCA7564)
EP89	POL0007238	LDEL Air Ladder Dust Collector

Emissions Point	Equipment ID	Description
EP89	POL0007250	Lemonade Air Ladder Dust Collector
EP89	POL0007094	Bentonite Pulse Jet Filter Receiver 1/2A and 1/2B
EP89	POL0007112	Bentonite Pulse Jet Filter Receiver 3/4A and 3/4B
EP89	POL0007112	Bentonite Pulse Jet Filter Receiver 3/4A and 3/4B
EP90	CNV0010001	Ore Transfer Conveyor 1
EP90	BSC0010002	Ore Transfer Conveyor 1 Belt Scale
EP90	CNV0010003	Ore Transfer Conveyor 2
EP90	CNV0010004	Ore Transfer Conveyor 3
EP90	CNV0010005	Ore Reversing Conveyor
EP90	BIN0010006	Ore Bin South
EP90	BIN0010009	Ore Bin North
EP90	CNV0010012	Ore Reversing Feeder Conveyor
EP90	BSC0010013	Ore Reversing Feeder Conveyor Belt Scale
EP90	SCR0010014	Ore Screener
EP90	ELV0010017	Ore Elevator
EP90	BIN0010018	Ore Surge Hopper
EP90	CNV0010020	Ore Shuttle Supply Weighbelt Feeder
EP90	CNV00010021	Ore Shuttle Feeder
EP90	BIN0010030	Ore Surge Bin #11
EP90	CNV0010034	Ore Weighbelt Feeder
EP90	BIN0010036	Ore Hopper
EP90	CNV0010038	Ore Furnace #11 Feed Reversing Conveyor
EP90	BIN0010080	Ore Surge Bin #12
EP90	CNV0010084	Ore Weighbelt Feeder
EP90	BIN0010086	Ore Hopper
EP90	CNV0010088	Ore Furnace #12 Feed Reversing Conveyor
EP90	BIN0010130	Ore Surge Bin #13
EP90	CNV0010134	Ore Weighbelt Feeder
EP90	BIN0010136	Ore Hopper
EP90	CNV0010138	Ore Furnace #13 Feed Reversing Conveyor
EP90	BIN0010180	Ore Surge Bin #14
EP90	CNV0010184	Ore Weighbelt Feeder
EP90	BIN0010186	Ore Hopper
EP90	CNV0010188	Ore Furnace #14 Feed Reversing Conveyor
EP90	BIN0010235	Ore Fines Surge Bin
EP90	BIN0010235	ORE FINES SURGE BIN From ORE SCREENER
EP90	POL0010237	Ore Fines Dust Collector
EP90	CNV0010244	Ore Fines Dust Collector Screw Conveyor
EP91	FUR0010042	Expander Furnace
EP91	SEP0010048	XP Separator
EP91	POL0010051	High Temperature Fines Baghouse

Emissions Point	Equipment ID	Description
EP92	FUR0010092	Expander Furnace
EP92	SEP0010098	XP Separator
EP92	POL0010101	High Temperature Fines Baghouse
EP93	SEP0010148	XP Separator
EP93	POL0010151	High Temperature Fines Baghouse
EP94	FUR0010192	Expander Furnace
EP94	SEP0010198	XP Separator
EP94	POL0010201	High Temperature Fines Baghouse
EP95	POL0010059	Furnace Process Line 11 - XP Receiver
EP96	POL0010109	Furnace Process Line 12 - XP Receiver
EP97	POL0010159	Furnace Process Line 13 - XP Receiver
EP98	POL0010209	Furnace Process Line 14 - XP Receiver
EP99	SCR0010068	XP Screener #11
EP99	DIV0010072	XP Screener #11 Diverter
EP99	BIN0010075	XP Hopper #11
EP99	CNV0010076	XP Weighbelt Feeder #11
EP99	SCR0010118	XP Screener #12
EP99	DIV0010072	XP Screener #12 Diverter
EP99	BIN0010125	XP Hopper #12
EP99	CNV0010126	XP Weighbelt Feeder #12
EP99	SCR0010168	XP Screener #13
EP99	DIV0010072	XP Screener #13 Diverter
EP99	BIN0010175	XP Hopper #13
EP99	CNV0010176	XP Weighbelt Feeder #13
EP99	SCR0010218	XP Screener #14
EP99	DIV0010072	XP Screener #14 Diverter
EP99	BIN0010225	XP Hopper #14
EP99	CNV0010226	XP Weighbelt Feeder #14
EP99	CNV0004490	XP Collection Conveyor
EP99	ELE0004491	XP Furnace Elevator
EP99	CNV0004497	XP Bridge Conveyor
EP99	CNV0004492	Reversing XP Conveyor
EP99	CNV0004317	Incline XP Conveyor
EP99	CNV0004495	North XP Storage Discharge Conveyor
EP99	SCR0004311	North XP Screener
EP99	CNV0004315	South XP Storage Discharge Conveyor
EP99	SCR0004316	South XP Screener
EP99	CNV0004883	North Reversing Waste Screw Conveyor
EP99	CNV0004884	South Reversing Waste Screw Conveyor
EP99	CNV0004490	XP Fines Collection Transfer Conveyor
EP99	ELE0004484	XP Fines Loadout Elevator

Emissions Point	Equipment ID	Description
EP99	BIN000XXXX	XP Fines Surge Bin
EP99	CNV0010284	XP Fines Dust Collector Screw Conveyor
EP99	POL0010277	XP Fines Dust Collector
EP100	POL0010270	Central Vacuum Filter Receiver
EP101	POL0010289	XP Fines Waste Filter Receiver
EP102	POL0010249	Ore Waste Fines Filter Receiver

N/A = Not Applicable

EMISSIONS/CONTROLS EVALUATION

Emission calculations for EP88 use a particulate matter emission factor of 0.37 lb/hr based on the stack test required by NSPS OOO conducted on a similar source at this installation EP37 in July 2019. Calculations use these particulate matter emission factors and continuous operation of 8760 hours per year. A particulate matter distribution of 50% PM being PM₁₀ and 20% PM being PM_{2.5} was used. This particulate matter distribution was provided by Nestle Purina PetCare Company - Golden Products Division and is the average of particulate matter distributions found in AP-42, Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing, August 2004.

Emission calculations for EP89 use emission factors from AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing, August 2004 were used for the conveying equipment transfer points. Emission factors from AP-42, Section 9.9.1 Grain Elevators & Processes, May 2003 were used for the air ladder cleaners. A 95% control efficiency for each piece of equipment with a vent filter was applied.

Emission calculations for EP90 use a particulate matter emission factor of 0.70 lb/hr based on the stack test required by NSPS OOO conducted on a similar source, EP70, at this installation in February 2016. Calculations use these particulate matter emission factors and continuous operation of 8760 hours per year. A particulate matter distribution of 50% PM being PM₁₀ and 20% PM being PM_{2.5} was used.

Emission calculations for EP91, EP92, EP93, and EP94 use a particulate matter emission factor of 0.02 lb/hr based on the stack test required by NSPS OOO conducted on a similar source at this installation in January 2020. Calculations use these particulate matter emission factors and continuous operation of 8760 hours per year. A particulate matter distribution of 50% PM being PM₁₀ and 20% PM being PM_{2.5} was used.

Emission calculations for EP95, EP96, EP97, and EP98 use a particulate matter emission factor of 0.03 lb/hr based on the stack test required by NSPS OOO conducted on a similar source at this installation in January 2020. Calculations use these particulate matter emission factors and continuous operation of 8760 hours per year. A particulate matter distribution of 50% PM being PM₁₀ and 20% PM being PM_{2.5} was used.

Emission calculations for EP99 use a particulate matter emission factor of 0.40 lb/hr based on the stack test required by NSPS OOO conducted on a similar source, EP71, at this installation in February 2016. Calculations use these particulate matter emission factors and continuous operation of 8760 hours per year. A particulate matter distribution of 50% PM being PM₁₀ and 20% PM being PM_{2.5} was used.

Emission calculations for EP100 use a particulate matter emission factor of 0.0005 lb/hr based on the stack test required by NSPS OOO conducted on a similar source, EP74 at this installation in September 2017. Calculations use these particulate matter emission factors and continuous operation of 8760 hours per year. A particulate matter distribution of 50% PM being PM₁₀ and 20% PM being PM_{2.5} was used.

Emission calculations for EP101 and EP102 use a particulate matter emission factor of 0.0007 lb/hr based on the stack test required by NSPS OOO conducted on a similar source, EP37, at this installation in September 2017. Calculations use these particulate matter emission factors and continuous operation of 8760 hours per year. A particulate matter distribution of 50% PM being PM₁₀ and 20% PM being PM_{2.5} was used.

Combustion emission calculations for EP91, EP92, EP93, and EP94 use emission factors from AP-42, Section 1.4 *Natural Gas Combustion*, July 1998 for the furnace burners.

The following table provides an emissions summary for this project. Existing potential emissions were taken from information provided by Nestle Purina PetCare Company stating PTE before this project as of April 9, 2019. Existing actual emissions were taken from the installation's 2019 EIQ. Potential emissions of the project represent the sum of project potential emissions from construction permit 022020-004 and potential emissions of the new equipment, assuming continuous operation (8760 hours per year).

Table 7: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2019 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	138.1	N/D	29.0	167.0
PM ₁₀	15.0	69.0	26.8	<15.0	84.0
PM _{2.5}	10.0	25.1	8.1	6.0	31.1
SO _x	40.0	38.8	0.4	0.2	39.0
NO _x	40.0	283.3	72.3	35.4	318.7
VOC	40.0	10.6	3.2	2.3	12.9
CO	100.0	139.3	49.4	32.6	171.9
HAPs	10.0/25.0	1.1	0.2	2.4	3.5

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

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 PM10 are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Nestle 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

- *Operating Permits*, 10 CSR 10-6.065
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required every year for Part 70 installations.
- *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
 - *Standards of Performance for Nonmetallic Mineral Processing Plants*, 40 CFR Part 60, Subpart OOO
 - *Standards of Performance for Calciners and Dryers in Mineral Industries*, 40 CFR Part 60, Subpart UUU

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*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 27, 2020, received May 28, 2020, designating Nestle Purina PetCare Company as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MWmegawatt
acfm actual cubic feet per minute	MHDRmaximum hourly design rate
BACT Best Available Control Technology	MMBtuMillion British thermal units
BMPs Best Management Practices	MMCFmillion cubic feet
Btu British thermal unit	MSDSMaterial Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_xnitrogen oxides
CFR Code of Federal Regulations	NSPSNew Source Performance Standards
CO carbon monoxide	NSRNew Source Review
CO₂ carbon dioxide	PMparticulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppmparts per million
dscf dry standard cubic feet	PSDPrevention of Significant Deterioration
EQ Emission Inventory Questionnaire	PTEpotential to emit
EP Emission Point	RACTReasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCCSource Classification Code
fps feet per second	scfmstandard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SICStandard Industrial Classification
GHG Greenhouse Gas	SIPState Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_xsulfur oxides
GWP Global Warming Potential	SO₂sulfur dioxide
HAP Hazardous Air Pollutant	SSM Startup, Shutdown & Malfunction
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMT vehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	