RE: New Source Review Permit Amendment - Permit Number: 032019-001A
Project Number: 2019-03-015; Installation Number: 019-0069

Mr. Ray Patterson
EHS Manager
Quaker Manufacturing, LLC
4501 Route B
Columbia, MO 65202

In your application for an amendment dated March 12, 2019, Quaker Manufacturing, LLC (Quaker) in Columbia, Missouri requested to expand to 64 rice cake machines (RCM) rather than 32 rice cake machines that was permitted in Permit # 032019-001. Due to the proximity in timing of this request with Permit # 032019-001, this project is being combined with the previous project. The increase in emissions associated with this doubling the number of machines will remain below de minimis for particulate matter and VOCs. A new oven will be installed and the maximum design rate for the natural gas combustion will increase from 3 MMBtu/hr to 6 MMBtu/hr. Emissions from this project will be below de minimis for all criteria air pollutants. The facility’s VOC emissions are limited to less than 100 tons of VOCs per consecutive 12-month period as stated in #OP2018-074 for the entire installation. An updated operating permit application is necessary to incorporate the new equipment and new oven into the 100 tpy VOC limit.

The following table is the updated potential emissions for 64 rice cake machines:

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>PM (tpy)</th>
<th>PM10 (tpy)</th>
<th>PM2.5 (tpy)</th>
<th>VOC (tpy)</th>
<th>NOx (tpy)</th>
<th>SO2 (tpy)</th>
<th>CO (tpy)</th>
<th>HAPs (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 6 Production</td>
<td>3.66</td>
<td>3.66</td>
<td>3.66</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Line 6 Room Ventilation</td>
<td>1.60</td>
<td>1.60</td>
<td>1.60</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Line 6 Oven Combustion</td>
<td>0.19</td>
<td>0.19</td>
<td>0.19</td>
<td>0.14</td>
<td>2.56</td>
<td>0.02</td>
<td>2.15</td>
<td>0.048</td>
</tr>
<tr>
<td>Liquid Flavouring</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>32.92</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Grain Receiving</td>
<td>0.61</td>
<td>0.14</td>
<td>0.02</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dry Flavoring</td>
<td>0.15</td>
<td>0.07</td>
<td>0.01</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Haul Roads</td>
<td>0.20</td>
<td>0.04</td>
<td>0.01</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>TOTALS</td>
<td>6.22</td>
<td>5.67</td>
<td>5.50</td>
<td>33.06</td>
<td>2.56</td>
<td>0.02</td>
<td>2.15</td>
<td>0.05</td>
</tr>
</tbody>
</table>
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 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 Administrative Hearing Commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
Permits Section Chief
KBH:kkd

Enclosures

c: Northeast Regional Office
   PAMS File: 2019-03-015
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 (3)(E). “Conditions required by permitting authority.”

Quaker Manufacturing, LLC
Boone County, S28, T49N, R12W

1. Superseding Condition
   The conditions of this permit supersede all special conditions found in the previously issued Construction Permit #032019-001 issued by the Air Pollution Control Program.

2. Capture Device Requirement – Hood
   A. Quaker Manufacturing, LLC shall capture emissions from 64 Rice Cake Machines (RCMs), referred to as Line 6, using hood(s).

   B. Quaker Manufacturing, LLC shall minimize cross drafts by locating the 64 RCMs on Line 6 and the hood(s) inside a building with four sides and a roof.

   C. Quaker Manufacturing, LLC shall design and construct each hood according to the most current version of the industrial ventilation manual entitled, "Industrial Ventilation – A Manual of Recommended Practice, American Conference of Governmental Industrial Hygienist”.

   D. Quaker Manufacturing, LLC shall demonstrate that each hood was constructed in accordance to Special Condition 2.C. by keeping record of the following design parameters for each hood:
      1) The cross-sectional area of the hood inlet
      2) The distance from the hood inlet to each of the 64 RCMs on Line 6
      3) The minimum recommended volumetric airflow
      4) The minimum recommended hood face velocity

   E. Within 90 days of the start of the operation, Quaker Manufacturing, LLC shall verify the proper operation of each hood by:
      1) Recording the actual face velocity and the actual volumetric airflow of each capture hood
      2) Performing a visual smoke puff test at each hood on Line 6
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

3. Control Device Requirement – Filters
   A. Quaker Manufacturing, LLC shall control emissions from the RCM Line 6 hoods using filters of at least two plies.
   B. The filters 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.
   C. Quaker Manufacturing, LLC shall develop a written standard operating procedure to monitor pressure drop and filter condition. The pressure drop across the filters shall be recorded at least once daily. Normal operation and replacement parameters shall be indicated. The standard operating procedure shall be kept on site.
   D. Quaker Manufacturing, LLC shall operate the filters according to the standard operating procedure. The operating pressure drop shall be maintained within the specifications of the standard operating procedure.
   E. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
   F. Quaker Manufacturing, LLC 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.

4. Record Keeping and Reporting Requirements
   A. Quaker Manufacturing, LLC 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. Quaker Manufacturing, LLC 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 e-mail at AirComplianceReporting@dnr.mo.gov, no later than ten days after the end
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.