

STATE OF MISSOURI

PERMIT BOOK



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: 122007-001 Project Number: 2007-08-132

Parent Company: Schreiber Foods, Inc.

Parent Company Address: P.O. Box 19010, Green Bay, WI 54307

Installation Name: Schreiber Foods, Inc – Monett

Installation Address: #10 Dairy Street, Monett, MO 65708

Location Information: Barry County, S31, T26, R27

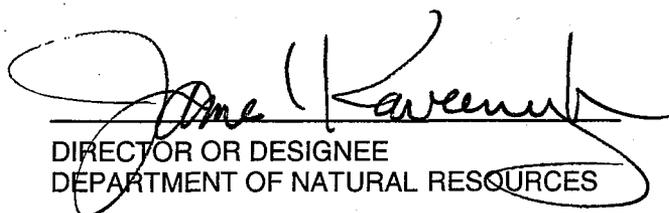
Application for Authority to Construct was made for:  
Addition of the capability to burn RES biofuel and No. 2 distillate fuel oil in the existing boilers (EP01 and EP02) and addition of economizers to these boilers. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 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.

DEC 4 2007

EFFECTIVE DATE

  
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 start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

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 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 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.

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: Project Number: 2007-08-132

Parent Company: Schreiber Foods, Inc.

Parent Company Address: P.O. Box 19010, Green Bay, WI 54307

Installation Name: Schreiber Foods, Inc – Monett

Installation Address: #10 Dairy Street, Monett, MO 65708

Location Information: Barry County, S31, T26, R27

Application for Authority to Construct was made for:  
Addition of the capability to burn RES biofuel and No. 2 distillate fuel oil in the existing boilers (EP01 and EP02) and addition of economizers to these boilers. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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EFFECTIVE DATE

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DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

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Permit No.	
Project No.	2007-08-132

**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."*

Schreiber Foods, Inc -- Monett  
Barry County, S31, T26, R27

1. **Superseding Condition**  
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 052004-006) from the Air Pollution Control Program.
2. **Emission Limitations**
  - A. Schreiber Foods, Inc – Monett shall emit less than 16.0 tons particulate matter less than 10 microns in diameter (PM<sub>10</sub>) from the boilers (EP01 and EP02) in any consecutive 12-month period.
  - B. Schreiber Foods, Inc – Monett shall emit less than 45.5 tons of Sulfur Oxides (SO<sub>x</sub>) from the boilers (EP01 and EP02) in any consecutive 12-month period.
  - C. Schreiber Foods, Inc – Monett shall emit less than 51.9 tons of Nitrogen Oxides (NO<sub>x</sub>) from the boilers (EP01 and EP02) in any consecutive 12-month period.
  - D. Attachment A, Attachment B and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A, 2.B and 2.C, respectively. Schreiber Foods, Inc -- Monett shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include sulfur content verification for all fuels used with these boilers.
  - E. Schreiber Foods, Inc -- Monett shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.D indicate that the source exceeds the limitation of Special Conditions Number 2.A, 2.B, and 2.C.

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Permit No.	
Project No.	2007-08-132

**SPECIAL CONDITIONS:**

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

3. The boilers shall use no other fuels other than natural gas, No. 2 fuel oil, No. 6 fuel oil or the Renewable Environmental Solutions (RES) biofuel without receiving prior written authorization from the Air Pollution Control Program.
4. Sulfur Content of Fuel
  - A. The sulfur content of the No. 2 fuel oil to be used in the boilers (EP-01 and EP-02) shall not exceed 0.2% by weight.
  - B. The sulfur content of the RES biofuel to be used in the boilers (EP-01 and EP-02) shall not exceed 90 ppmv.
  - C. The sulfur content of the No.6 fuel oil to be used in the boilers (EP-01 and EP-02) shall not exceed 4% by weight.
  - D. Schreiber Foods, Inc -- Monett shall obtain the sulfur content of each fuel type at least once every 3 months from either the fuel vendors or conduct their own fuel analysis to evaluate the typical sulfur content weight percent of the fuel oil. If a particular type of fuel is not used during the three (3)-month period and no new fuel of that type is purchased, then no testing is required.
  - E. The fuel consumption records and statement shall be kept on-site for five (5) years and shall be made immediately available to the Missouri Department of Natural Resources' personnel upon request.

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

Project Number: 2007-08-132  
Installation ID Number: 009-0021  
Permit Number:

Schreiber Foods, Inc – Monett  
#10 Dairy Street  
Monett, MO 65708

Complete: August 31, 2007

Parent Company:  
Schreiber Foods, Inc.  
P.O. Box 19010  
Green Bay, WI 54307

Barry County, S31, T26, R27

REVIEW SUMMARY

- Schreiber Foods, Inc – Monett has applied for authority to add the capability to burn RES biofuel and No. 2 fuel oil in the existing boilers (EP01 and EP02) and addition of economizers to these boilers.
- Insignificant amounts of Hazardous Air Pollutant (HAP) emissions are expected from the burning of the RES biofuel and No. 2 fuel oil.
- Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, of the New Source Performance Standards (NSPS) applies to the boilers since modification were made in order to burn the new fuels.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the boilers. Subpart DDDDD, *MACT Standard for Industrial, Commercial and Institutional Boilers and Process Heaters* does not apply since this facility is not considered a major source of HAPs.
- No air pollution control equipment is being used in association with the new equipment.
- 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>, SO<sub>x</sub>, and NO<sub>x</sub> from the project are above the de minimis level. However, emissions of these pollutants are below de minimis levels based on the actual-to-potential test per 40 CFR 52.21. Potential emissions of volatile organic compounds (VOCs) and carbon monoxide (CO) from the project are below the de minimis level.
- This installation is located in Barry County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential-minus-actual emissions of the application are conditioned to below de minimis levels.
- Emissions testing is not required for the boilers.
- A revision to the Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Schreiber Foods, Inc – Monett (Schreiber Foods) owns and operates a cheese manufacturing plant in Monett, Missouri. In 2006, Schreiber purchased two dual-fueled boilers (EP-01 and EP-02) from Dairy Farmers of America, Inc. These boilers have remained in the same physical location and, therefore, did not require re-permitting.

Schreiber Foods (County-Plant # 009-0021) and Dairy Farmers of America (County-Plant # 009-0030) are considered one installation for permitting purposes. They are considered a major source for New Source Review and Operating Permitting purposes.

A Part 70 Operating Permit (OP2005-031) was issued to Dairy Farmers in November of 2005. A Part 70 application was received from Schreiber Foods in October of 2006. The following New Source Review permits have been issued to Schreiber Foods and Dairy Farmers of America from the Air Pollution Control Program.

Table 1: Previously Issued New Source Review Permits

Permit Number	Description
052004-006	Installation of 55.5 MMBtu per hour dual-fired boiler.
102004-011	Installation of biogas flare.
122006-013	Temporary permit to combust biofuel oil in boiler #1.

### PROJECT DESCRIPTION

Schreiber Foods – Monett currently operates two boilers (EP-01 and EP-02) capable of combusting natural gas and No. 6 fuel oil. Boiler #1 was installed prior to May 13, 1982 and was exempt from New Source Review permitting. Boiler #2 was permitted under Permit No. 052004-006. Temporary Permit No. 122006-013 allowed for combustion of the RES biofuel in Boiler #1 in order to assess its viability as a fuel source and to conduct emissions testing. Schreiber Foods is now seeking authority to permanently allow for the combustion of the RES biofuel and to also allow for combustion of No. 2 fuel oil in the existing boilers.

Both boilers require modifications in order to be able to burn the RES fuel. Since this is viewed as a modification to the boiler, Boiler #1 will no longer be exempt from New Source Review permitting.

Boiler #1 and #2 are rated at 52.5 and 55.5 MMBtu per hour, respectively. Economizers are being installed on the boilers to improve boiler efficiency. The addition of the economizers will not further increase emissions due to their installation.

On March 7, 2006, emissions testing on PM<sub>10</sub>, SO<sub>x</sub>, NO<sub>x</sub>, CO and VOC was conducted at Schreiber Foods while combusting RES biofuel in Boiler #1. The test results were approved by the Air Pollution Control Program and have been used to develop emission factors for combustion of RES biofuel used in this analysis.

### SIGNIFICANT EMISSIONS INCREASE DETERMINATION

As seen in Table 2 below, the total potential emissions of PM<sub>10</sub>, SO<sub>x</sub> and NO<sub>x</sub> from the project are above de minimis levels, which are also the major source thresholds for a major source. Since this project is a modification of existing emissions units, the emissions increase of PM<sub>10</sub>, SO<sub>x</sub> and NO<sub>x</sub> are determined by calculating the difference between the projected actual emissions and the baseline actual emissions. Potential emissions of the new fuels were used in place of projected actual emissions in order to reduce the recordkeeping requirements of the company in the future. The baseline actual emissions used in this analysis were from the consecutive calendar years of 2002 and 2003. The emission rates for PM<sub>10</sub> were corrected using an updated emission factor. In order to avoid a Section (8) review, the potential emissions of this modification were limited so that a de minimis increase for PM<sub>10</sub>, SO<sub>x</sub> and NO<sub>x</sub> above their current actual emissions are allowed.

Table 2: Baseline Actual-to Potential Evaluation (tons per year)

Pollutant(s)	Potential Emissions	2002/2003 Baseline Emissions	Emissions Increase of Project
PM <sub>10</sub>	48.7	1.0	47.7
SO <sub>x</sub>	102.2	5.6	96.6
NO <sub>x</sub>	119.2	11.9	107.3

### EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.3, *Fuel Oil Combustion (9/98)*, Section 1.4, *Natural Gas Combustion (7/98)* and stack tests performed on Boiler #1 combusting the RES biofuel. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

The potential emissions for natural gas and No. 6 fuel oil were recalculated for Boilers #1 and #2 using the most recent emission factors available and the highest rate for

each criteria pollutant was used to determine the existing potential emissions of the boilers. The existing potential emissions of the biogas flare permitted in Permit No. 102004-011 were added to existing potential emissions of the boilers. These emissions account for all potential emissions at the installation.

Existing actual emissions were obtained from the 2006 Emissions Inventory Questionnaire (EIQ) for Schreiber Foods. There were no reported emissions in 2006 for Dairy Farmers of America.

Potential emissions were calculated for the RES fuel and No. 2 fuel oil for both boilers and the highest rate for each criteria pollutant of the two fuels was used to determine the potential emissions of the application. The following table provides an emissions summary for this project.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions of Installation	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	Project Conditioned Potential
PM <sub>10</sub>	15.0	80.2	0.75	48.7	<16.0
SO <sub>x</sub>	40.0	2005.7	0.05	102.2	<45.6
NO <sub>x</sub>	40.0	176.0	9.92	119.2	<51.9
VOC	40.0	2.5	0.54	4.7	N/A
CO	100.0	86.2	8.33	92.2	N/A
HAPs	10.0/25.0	0.9	N/D	N/D	N/A

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

With this permit, Boilers #1 and #2 have the capability of burning any one of the four following fuels: natural gas, No. 6 fuel oil, No. 2 fuel oil and RES fuel. The following table represents the new potential emissions of the installation. The highest rate for each pollutant of all the fuels was taken. With this permit, the installation is no longer considered a major source for Construction Permitting purposes.

Table 4: Potential Emissions of the Installation (tons per year)

Equipment	PM10	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	HAPs
Boiler #1	<16.0	<45.6	<51.9	2.3	44.8	0.4
Boiler #2				2.4	47.4	0.5
Biogas flare	1.1	0.0	2.5	0.0	47.4	0.0
TOTAL	17.1	45.6	54.4	4.7	139.6	0.9

#### 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>, SO<sub>x</sub>, and NO<sub>x</sub> from the project are above the de minimis level. However, emissions of these pollutants are below de minimis levels based on the actual-to-potential test per 40 CFR 52.21. Potential emissions of volatile organic compounds (VOCs) and carbon monoxide (CO) from the project are below the de minimis level.

## APPLICABLE REQUIREMENTS

Schreiber Foods, Inc -- Monett 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*  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *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 10-3.090*

### SPECIFIC REQUIREMENTS

- *New Source Performance Regulations, 10 CSR 10-6.070 – NSPS for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc*
- *Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260*
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-3.060*

## 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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Susan Heckenkamp  
Environmental Engineer

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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 August 23, 2007, received August 31, 2007, designating Schreiber Foods, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Emissions Testing Report prepared for Changing World Technologies, Inc. by Air Source Technologies, Inc. for testing performed at Schreiber Foods, Inc in Monett, MO on March 7, 2007.
- Southwest Regional Office Site Survey, dated September 20, 2007.







Mr. Larry Hanna  
Maintenance Team Leader  
Schreiber Foods, Inc -- Monett  
#10 Dairy Street  
Monett, MO 65708

RE: New Source Review Permit - Project Number: 2007-08-132

Dear Mr. Hanna:

Enclosed with this letter is your permit to construct. Please study it carefully. 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 revised 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 Susan Heckenkamp the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by phone at (573) 751-4817. Thank you for your attention to this matter.

incerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:shl

Enclosures

c: Southwest Regional Office  
PAMS File 2007-08-132  
Permit Number: