



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

**MAY 15 2019**

Mr. Nick Henderson  
HSE Manager  
Heartland Pet Food Manufacturing, Inc.  
8101 E 32nd St  
Joplin, MO 64804

RE: New Source Review Permit Amendment - Permit Number: 052013-007D  
Project Number: 2019-02-047; Installation Number: 097-0171

Dear Mr. Henderson:

On February 27, 2019 the Air Pollution Control Program received your request to amend permit 052013-007C in order to include new ingredient unloading equipment with an associated baghouse. The new equipment is a Horizon 40SWR8 super sack unloader (EP-32) controlled by a baghouse that feeds to the existing grain conveyance (EP-05). The ingredients from the new super sack unloader will be used in the same process as existing ingredients received. Heartland Pet Food Manufacturing, Inc. will receive bulk ingredients, process them into fine particles, pelletize the mixture of ingredients, and dry the finished product.

The bottleneck of the process is the pellet coolers. Permit 052013-007B indicates a combined MHDR for the three pellet coolers equal to 31.9 tons per hour. The manufacturer of the coolers indicates a combined MHDR of 42 tons per hour; however, Heartland Pet Food Manufacturing, Inc. produces a premium pet food that cannot be extruded through the pellet cooler as fast as a lower quality pet food. Therefore, the potential to emit from ingredient receiving is based on a bottlenecked production rate equal to 31.9 tons per hour. Special Condition 3 of permit 052013-007B requires Heartland Pet Food Manufacturing, Inc. to stack test at the higher hourly production rate if the actual production divided by the hours of pellet cooler operation exceeds 31.9 tons per hour on a monthly basis. The addition of a new super sack unloader (EP-32) will not change the production rate or the ingredient receiving emissions since the equipment is still bottlenecked by the three pellet coolers to 31.9 tons per hour. The purpose of this amendment is to update Special Condition 2 of permit 050213-007C to require a baghouse on the ingredient unloading from the new super sack unloader (EP-32).

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



Recycled paper

Mr. Nick Henderson  
Page Two

administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions regarding this amendment, please do not hesitate to contact Chad Stephenson, 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:csj

Enclosures

c: Southwest Regional Office  
PAMS File: 2019-02-047

Page No.	3
Permit No.	052013-007D
Project No.	2019-02-047

**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."*

Heartland Pet Food Manufacturing, Inc.  
Jasper County, S14, T27N/, R32W

1. **Superseding Condition**  
The conditions of this permit supersede Special Condition 2 found in the previously issued construction permit 052013-007C issued by the Air Pollution Control Program.
2. **Control Device Requirement-Baghouse**
  - A. Heartland Pet Foods Manufacturing, Inc. shall control emissions from the equipment in Table 2 using baghouses as specified in the permit application.

**Table 2: Equipment Requiring Baghouse Control**

Emission Point	Emission Unit	Description
EP-06	EU-6	Pre-grind Hammer mill
EP-08	EU-8	Micro-ingredient Mixing
EP-09	EU-9	Hammer mill
EP-10	EU-10	Hammer mill
EP-11	EU-11	Hammer mill
EP-18	EU-18	Dryer Fines Collection 1 (2 baghouses)
EP-19	EU-19	Dryer Fines Collection 2 (2 baghouses)
EP-20	EU-20	Dryer Fines Collection 3 (2 baghouses)
EP-25	EU-25	Finish Product Fines Collection 1
EP-26	EU-26	Finish Product Fines Collection 2
EP-27	EU-27	Finish Product Fines Collection 3
EP-32	EU-32	Horizon 40SWR8 Super Sack Unloading

Page No.	4
Permit No.	052013-007D
Project No.	2019-02-047

**SPECIAL CONDITIONS:**

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

- B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse 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. 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).
- D. Heartland Pet Foods Manufacturing, Inc. 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.
- E. Heartland Pet Foods Manufacturing, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
  - 1.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - 2.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.