

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

# INTERMEDIATE STATE PERMIT TO OPERATE

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

**Intermediate Operating Permit Number:** OP2017-075  
**Expiration Date:** OCT 17 2022  
**Installation ID:** 077-0026  
**Project Number:** 2015-10-051

**Installation Name and Address**

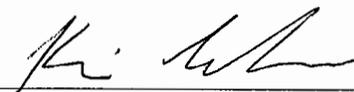
The Kraft Heinz Company  
2035 East Bennett  
Springfield, MO 65804  
Greene County

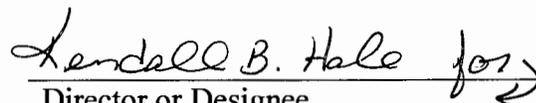
**Parent Company's Name and Address**

The Kraft Heinz Company  
Three Lakes Drive  
Northfield, IL 60093-2753

**Installation Description:**

The Kraft Heinz Company is a food processing and manufacturing installation. The primary products are cheese, pasta, pasta sauces, and cream cheese. The processing activities include milling, cooking, and drying. Two 72.5 MMBtu/hr boilers use natural gas and distillate fuel oil. This facility is a synthetic minor emitter of particulate matter with an aerodynamic diameter of less than or equal to ten microns (PM<sub>10</sub>).

  
Prepared by:  
Kasia Wasescha  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

OCT 17 2017

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

Emission Unit	Description	Control Device <sup>1</sup>
EP-04	Grain Receiving Railcar Unloading in Train Shed	CD10 (Baghouse)
EP-05	Flour Regrind Dust Collector; 1975	CD1 (Baghouse)
EP-06	Flour Regrind Pasta Receiving Filter Exhaust; 1975	CD2 (Baghouse)
EP-07	Flour Regrind Pasta Mill Exhaust; 1975	CD12 (Baghouse)
EP-08	Process Flour Holding Tank Dust Collector (Regrind Room); 1975	CD4 (Baghouse)
EP-22	Flour Unloading Vacuum Exhaust	CD13 (Baghouse)
EP-23	Flour Storage Silo, 12.5 tons/hr	CD28 (Baghouse)
EP-30	Boiler #1, 1997, natural gas-fired with distillate fuel oil as backup; 72.5 MMBtu/hr	-
EP-31	Boiler #2, 1997, natural gas-fired with distillate fuel oil as backup; 72.5 MMBtu/hr	-
EP-41	Pasta 2 <sup>nd</sup> Floor Conveyor Dust Collector; 2004	CD25 (Dust Collector)
EP-42	Natural Cuts Bulk Powder Dumping Dust Collector; 1992	CD26 (Dust Collector)
EP-43	Final Dryer D Finished Goods Dust Collector; 1974	CD27 (Dust Collector)
EP-45	West Side Emergency Diesel Engine; 3.04 MMBtu/hr	-
EP-46	East Side Emergency Diesel Engine; 1.1 MMBtu/hr	-

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Emission Unit	Description
EP-13	Lab ether exhaust
EP-15	Process cheese salt handling room
EP-26	Process cheese blenders/cookers
EP-28, EP-29	30,000-gallon fuel oil storage tanks (distillate fuel oil #2)
EP-34	Salt brine silo
EP-44	Parts Washer
-	Pneumatic transfer of flour from the storage bin to the surge bin
-	Bin vent filters associated with Magellan Project

<sup>1</sup> The control devices listed are considered federally enforceable or inherent in their use. There may be other control devices used on the emission points of this facility, but their use is not required by this operating permit.

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

<p style="text-align: center;"><b>PERMIT CONDITION PW001</b> 10 CSR 10-6.065(5) Voluntary Limitation(s)</p>
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**Emission Limitation:**

The permittee shall emit less than 100.0 tons per year of PM<sub>10</sub> (particulate matter with an aerodynamic diameter of less than or equal to ten microns) in any consecutive rolling 12-month period.

**Monitoring/Recordkeeping:**

1. The permittee shall record the emissions of PM<sub>10</sub> using Attachment E or an equivalent tracking method.
2. The permittee shall maintain all records on-site for a minimum of five years.
3. The permittee shall make such records available to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month, if the 12-month cumulative total records show that the source exceeded the limitation.
2. The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units	
Emission Point	Description
EP-30	Boiler #1, 1997, natural gas-fired with distillate fuel oil as backup; 72.5 MMBtu/hr
EP-31	Boiler #2, 1997, natural gas-fired with distillate fuel oil as backup; 72.5 MMBtu/hr

**Emission Limitation:**

1. Sulfur Dioxide (SO<sub>2</sub>):
  - a) If the permittee combusts oil, they shall combust oil in the boilers that does not contain greater than 0.5 weight percent sulfur. [§60.42c(d)]
  - b) Compliance with the fuel oil sulfur limit shall be determined on a 30-day rolling average basis. [§60.42c(g)]
  - c) Compliance with the fuel oil sulfur limits may be determined based on a certification from the fuel supplier, as described under §63.48c(f). [§60.42c(h)]
  - d) The fuel sulfur limit shall apply at all times, including periods of startup, shutdown, and malfunction. [§60.42c(i)]
2. Particulate Matter (PM):
  - a) If the permittee combusts oil from the boilers, they shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. [§60.43c(c)]
  - b) The PM and opacity standards apply at all times, except during periods of startup, shutdown, or malfunction. [§60.43c(d)]

**General Compliance:**

1. Sulfur Dioxide (SO<sub>2</sub>):
  - a) If the permittee seeks to demonstrate compliance with the fuel oil sulfur limits under §63.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank to be fired in the steam generating units to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the permittee shall sample the oil in the fuel tank after each new shipment of oil is received, as described under §60.46c(d)(2). [§60.44c(g)]
  - b) If the permittee seeks to demonstrate compliance with the SO<sub>2</sub> standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable. [§60.44c(h)].
2. Particulate Matter (PM):

- a) The permittee shall conduct subsequent performance tests as requested by the Director, to determine compliance with the standards using the procedures and reference methods under §60.45c(a)(1) through (a)(8), except as specified in §60.45c(c). [§60.45c(a)]
- b) In place of PM testing with Method 5 or 5B of NSPS Appendix A-3 or Method 17 of NSPS Appendix A-6, the permittee may elect to install, calibrate, maintain, and operate a CEMS for monitoring PM emissions discharged to the atmosphere and record the output of the system. The permittee of an affected facility who elects to continuously PM emissions instead of conducting performance testing using Method 5 or 5B of NSPS Appendix A-3 or Method 17 of NSPS Appendix A-6 shall install, calibrate, maintain, and operate a CEMS and shall comply with the requirements specified in §63.45c(c)(1) through (c)(14). [§60.45c(c)]

**Emission Monitoring:**

1. Sulfur Dioxide (SO<sub>2</sub>):

- a) As an alternative to operating a CEMS at the inlet to the SO<sub>2</sub> control device (or outlet of the steam generating unit if no SO<sub>2</sub> control device is used) as required under §60.46c(a), the permittee may elect to determine the average SO<sub>2</sub> emission rate by sampling the fuel prior to combustion. Fuel sampling shall be conducted pursuant to either §60.46c(d)(1) or (d)(2). [§60.46c(d)]
  - i) Oil samples shall be collected daily in an as-fired condition at the inlet to the steam generating unit and analyzed for sulfur content and heat content according to Method 19 of NSPS Appendix A. [§60.46c(d)(1)]
  - ii) As an alternative fuel sampling procedure for affected facilities combusting oil, oil samples may be collected from the fuel tank for each steam generating unit immediately after the fuel tank is filled and before any oil is combusted. The permittee shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater than 0.5 weight percent sulfur, the permittee shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to be 0.5 weight percent sulfur or less. [§60.46c(d)(2)]
- b) The monitoring requirements of §60.46c(d) shall not apply to affected facilities subject to §60.42c(h) where the permittee seeks to demonstrate compliance with the SO<sub>2</sub> standards based on fuel supplier certification, as described under §60.48c(f), as applicable. [§60.46c(e)]

2. Particulate Matter (PM):

- a) As an alternative to operating a COMS to monitor the opacity of the emissions discharged as required under §60.47c(a), if the permittee burns only distillate fuel oil, the permittee may elect to follow the applicable procedures in §60.48c(f); or [§60.47c(c)]
- b) The permittee is not required to operate a COMS provided that the affected facility meets the following: [§60.47c(f)]
  - i) The permittee operates the steam generating units according to a written site-specific monitoring plan approved by the permitting authority. The monitoring plan must include procedures and criteria for establishing and monitoring specific parameters for the affected facility indicative of compliance with the opacity standard. For testing performed as part of this site-specific monitoring plan, the permitting authority may require as an alternative to the notification and reporting requirements specified in §§60.8 and 60.11 that the permittee

submit any deviations with the excess emissions report required under §60.48c(c).  
[§60.47c(f)(3)]

**Recordkeeping/Reporting:**

1. The permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7. This notification shall include: [§60.48c(a)]
  - a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility. [§60.48c(a)(1)]
  - b) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c. [§60.48c(a)(2)]
  - c) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired. [§60.48c(a)(3)]
  - d) Notification if an emerging technology will be used for controlling SO<sub>2</sub> emissions. The Director will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Director may require the permittee to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Director. [§60.48c(a)(4)]
2. The permittee shall submit to the Director the performance test data from any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in NSPS Appendix B. [§60.48c(b)]
3. In addition to the applicable requirements in §60.7, the permittee of an affected facility subject to the opacity limits in §60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period and maintain records according to the requirements specified in §60.43c(c)(1) through (c)(3), as applicable to the visible emissions monitoring method used. [§60.48c(c)]
  - a) For each performance test conducted using Method 9 of NSPS Appendix A-4, the permittee shall keep the records including the information specified in §60.48c(c)(1)(i) through (iii) as follows: [§60.48c(c)(1)]
    - i) Dates and time intervals of all opacity observation periods; [§60.48c(c)(1)(i)]
    - ii) Name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and [§60.48c(c)(1)(ii)]
    - iii) Copies of all visible emission observer opacity field data sheets; [§60.48c(c)(1)(iii)]
  - b) For each performance test conducted using Method 22 of NSPS Appendix A-4, the permittee shall keep the records including the information specified in §60.48c(c)(2)(i) through (iv) as follows: [§60.48c(c)(2)]
    - i) Dates and time intervals for all visible emissions observation periods; [§60.48c(c)(2)(i)]
    - ii) Name and affiliation for each visible emission observer participating in the performance test; [§60.48c(c)(2)(ii)]
    - iii) Copies of all visible emission observer opacity field data sheets; and [§60.48c(c)(2)(iii)]
    - iv) Documentation of any adjustments made and the time the adjustments were completed to the affected facility operation by the permittee to demonstrate compliance with the applicable monitoring requirements. [§60.48c(c)(2)(iv)]
  - c) For each digital opacity compliance system, the permittee shall maintain records and submit reports according to the requirements specified in the site-specific monitoring plan approved by the Director. [§60.48c(c)(3)]
4. The permittee shall submit reports to the Director. [§60.48c(d)]

5. The permittee shall keep records and submit reports as required under §60.48c(d), including the following information, as applicable: [§60.48c(e)]
  - a) Calendar dates covered in the reporting period. [§60.48c(e)(1)]
  - b) Each 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken. [§60.48c(e)(2)]
  - c) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under §60.48c(f)(1) through (4), as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. [§60.48c(e)(11)]
6. Fuel supplier certification shall include the following information: [§60.48c(f)]
  - a) For distillate oil: [§60.48c(f)(1)]
    - i) The name of the oil supplier; [§60.48c(f)(1)(i)]
    - ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and [§60.48c(f)(1)(iii)]
    - iii) The sulfur content or maximum sulfur content of the oil. [§60.48c(f)(1)(iii)]
7. Except as provided under §60.48c(g)(2) and (g)(3), the permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [§60.48c(g)(1)]
8. As an alternative to meeting the requirements in §60.48c(g)(1), for an affected facility that combusts only natural gas or fuels using fuel certification in §60.48(f) to demonstrate compliance with the SO<sub>2</sub> standard, the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month. [§60.48c(g)(2)]
9. As an alternative to meeting the requirements of §60.48c(g)(1), where the only fuels combusted in any steam generating unit (including steam generating units not subject to NSPS Dc) at the property are natural gas, wood, or distillate oil meeting the most current requirements in §60.42c to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emission standard (excluding opacity), the permittee may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]
10. The reporting period for the reports required under NSPS Dc is each six-month period. All reports shall be submitted to the Director and shall be postmarked by the 30<sup>th</sup> day following the end of the reporting period. [§60.48c(j)]
11. The permittee shall maintain these records on-site for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
12. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification as required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	
<b>Emission Point<sup>2</sup></b>	<b>Description</b>
EP-04	Grain Receiving Railcar Unloading in Train Shed
EP-05	Flour Re grind Dust Collector
EP-06	Flour Re grind Pasta Receiving Filter Exhaust
EP-07	Flour Re grind Pasta Mill Exhaust
EP-08	Process Flour Holding Tank Dust Collector (Re grind Room)
EP-22	Flour Unloading Vacuum Exhaust
EP-23	Flour Storage Silo, 12.5 tons/hr
EP-30	Boiler #1, 1997, natural gas-fired with distillate fuel oil as backup; 72.5 MMBtu/hr
EP-31	Boiler #2, 1997, natural gas-fired with distillate fuel oil as backup; 72.5 MMBtu/hr
EP-41	Pasta 2 <sup>nd</sup> Floor Conveyor Dust Collector
EP-42	Natural Cuts Bulk Powder Dumping Dust Collector
EP-43	Final Dryer D Finished Goods Dust Collector

**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20%.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

1. The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

<sup>2</sup> This rule shall only apply to the boilers when they are burning distillate fuel. It does not apply when they are burning natural gas.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachment B and Attachment C (or an equivalent tracking method), noting:

1. Whether any air emissions (except for water vapor) were visible from the emission units;
2. All emission units from which visible emissions occurred;
3. Whether the visible emissions were normal for the process;
4. The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
5. The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>	
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Point	Description
EP-45	Caterpillar emergency engine; diesel fueled; 402 hp; ca. 1991

**Operational Limitation:**

1. The permittee must meet the requirements in Table 2d of MACT ZZZZ that apply to EP-45. [§63.6603(a)]
  - a) Change oil and filter every 500 hours of operation or annually, whichever comes first<sup>3</sup>.
  - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
  - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

**General Compliance Requirements:**

1. The permittee must be in compliance with the operating limitations in this permit condition at all times. [§63.6605(a)]
2. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include,

<sup>3</sup> Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2 of MACT ZZZZ.

but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

3. The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or the permittee shall develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)(2)]
4. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]

**General Provisions:**

The permittee shall comply with each of the General Provisions that apply to the emergency engine as listed in Table 8 of MACT ZZZZ. [§63.6640(e)]

**Continuous Compliance Requirements:**

1. The permittee shall demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
  - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
  - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2. The permittee shall report each instance in which they did not meet the requirements of this permit condition or Table 2d of MACT ZZZZ according to the requirements in §63.6650. [§63.6640(b)]
3. The permittee shall report each instance which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
4. The emergency generator shall be operated according to the following requirements: [§63.6640(f)]
  - a) There is no time limit on the use of the emergency generator in emergency situations. [§63.6640(f)(1)]
  - b) The permittee may operate the emergency generator for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
    - i) The emergency generator may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency generator beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
  - c) Emergency stationary RICE located at minor sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to

generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

**Notifications:**

The permittee shall submit required notifications as specified in §63.6645.

**Recordkeeping:**

1. The permittee shall keep the following records: [§63.6655(a)]
  - a) A copy of each notification and report that they submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
  - b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
  - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
  - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
  - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
2. The permittee must keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that they operated and maintained the stationary RICE according to their own maintenance plan. [§63.6655(e)]
4. The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§63.6655(f)]
5. Records may be kept in either written or electronic form and maintained for at least five years. [§63.6660(c)]
6. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request. [§63.6660(a)]

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

**PERMIT CONDITION 004**

10 CSR 10-6.070, New Source Performance Regulations  
40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition  
Internal Combustion Engines  
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations  
40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for  
Stationary Reciprocating Internal Combustion Engines

Emission Point	Description
EP-46	Caterpillar emergency engine; diesel fueled; 157 hp; ca. 2012

**Emission Limitations:**

1. The permittee must comply with the emission standards for new non-road CI engines in §60.4202 for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [§60.4205(b)]
  - a) The emergency engine shall not emit more than: [§60.4202(a)(2) & §89.112(a)]
    - i) 4.0 g/kW-hr NMHC + NO<sub>x</sub>;
    - ii) 5.0 g/kW-hr CO;
    - iii) 0.30 g/kW-hr PM.
  - b) Exhaust opacity from CI non-road engines must not exceed: [§89.113(a)]
    - i) 20 percent during the acceleration mode;
    - ii) 15 percent during the lugging mode;
    - iii) 50 percent during the peaks in either the acceleration or lugging modes.
2. The permittee must operate and maintain the stationary CI ICE that achieve the emission standards as required in §60.4205 over the entire life of the engine. [§60.4206]

**Operational Limitations:**

1. The permittee must purchase diesel fuel that meets the requirements of 40 CFR §80.510(b) for nonroad diesel fuel. [§60.4207(b)]
  - a) All diesel fuel is subject to the following per gallon standards: [§80.510(b)]
    - i) A maximum sulfur content of 15 ppm; [§80.4207(b)(1)]
    - ii) A cetane or aromatic content, as follows: [§80.4207(b)(2)]
      - (1) A minimum cetane index of 40; or
      - (2) A maximum aromatic content of 35 volume percent.
2. The permittee must install a non-resettable hour meter on the engine if one is not already installed. [§60.4209(a)]

**Compliance Requirements:**

1. The permittee shall do all of the following, except as permitted under §60.4211(g): [§60.4211(a)]
  - a) Operate and maintain the stationary CI ICE according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
  - b) Change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
  - c) Meet the requirements of 40 CFR parts 89, 94, and/or 1068, as they apply. [§60.4211(a)(3)]
2. The engine shall certified to the emission standards in §60.4205(b), as applicable, for the same model year and engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. [§60.4211(c)]

3. The permittee must operate the emergency stationary ICE according to the requirements of §60.4211(f)(1) through (f)(3). In order for the engine to be considered an emergency stationary ICE under NSPS IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4211(f)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements in §60.4211(f)(1) through (3), the engine will not be considered an emergency engine under NSPS IIII and must meet all requirements for non-emergency engines. [§60.4211(f)]
- a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
  - b) The permittee may operate their emergency stationary ICE for any of the purposes specified in §60.4211(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by §60.4211(f)(2). [§60.4211(f)(2)]
    - i) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. [§60.4211(f)(2)(i)]
  - c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance provided in §60.4211(f)(2). Except as provided in §60.4211(f)(3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity according to §60.4211(f)(3)(i) through (ii). [§60.4211(f)(3)]
  - d) If the permittee does not install, configure, operate, and maintain the engine according to the manufacturer's emission-related written instructions, or if they change the emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: [§60.4211(g)]
    - i) The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test according to §60.4212 in order to demonstrate compliance with the applicable emissions standards within 1 year after the engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer. [§60.4211(g)(2)]
  - e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR §89.112, as applicable, shall not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR §89.112, as applicable, determined from the following equation:  
NTE requirement of each pollutant =  $(1.25) \times (\text{STD})$  (Eq. 1)  
Where:

STD = The standard specified for that pollutant in 40 CFR §89.112, as applicable.  
Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR §89.112 may follow the testing procedures specified in §60.4213 of NSPS III, as appropriate. [§60.4212(c)]

**General Provisions:**

The permittee shall comply with the General Provisions in §§60.1 through 60.19 that apply as listed in Table 8 of NSPS III. [§60.4218]

**MACT ZZZZ:**

If the permittee meets all the requirements of NSPS III for EP-46, no requirements are needed to be met under MACT ZZZZ, as compliance is met with MACT ZZZZ by complying with NSPS III. [§63.6590(c)]

**Recordkeeping/Reporting:**

1. If the engine does not meet the standards applicable to non-emergency engines, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation at that time. [§60.4214(b)]
2. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten (10) days after any exceedance or violation of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance or violation of this regulation.
3. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 005</b>	
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions	
<b>Emission Point</b>	<b>Description</b>
EP-45	CI 4SLB Caterpillar emergency engine; diesel fueled; 402 hp; ca. 1991
EP-46	Caterpillar emergency engine; diesel fueled; 157 hp; ca. 2012

*Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement<sup>4</sup>*

**Operational Limitation:**

Fuel sulfur content will not contain more than 8,812 parts per million (ppm<sub>v</sub>) of sulfur for distillate fuel.

**Monitoring/Recordkeeping:**

1. The permittee shall determine compliance using fuel delivery records, fuel sampling and analysis, performance tests, continuous emission monitoring, or other compliance methods approved by the staff director and the U.S. Environmental Protection agency and incorporated into the state implementation plan.

<sup>4</sup> This regulation has not yet been adopted into Missouri’s SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri’s SIP this regulation will be both a state and federal requirement. No action on the part of the permittee is needed to revise the operating permit.

2. The permittee must maintain a list of modifications to the source's operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess emissions.
3. The permittee must maintain a record of data, calculations, results, records and reports from any performance test, fuel deliveries, and/or fuel sampling tests.
4. The permittee must maintain a record of any applicable monitoring data, performance evaluations, calibration checks, monitoring system and device performance tests, and any adjustments and maintenance performed on these emission points.
5. If the permittee is using fuel delivery records for compliance they must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
  - a) The name, address, and contact information of the fuel supplier;
  - b) The type of fuel;
  - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
  - d) The heating value of the fuel.
6. The permittee shall maintain records for a minimum of five (5) years on-site.
7. The permittee shall make all records immediately available to Missouri Department of Natural Resources personnel upon request.

**Reporting:**

1. The permittee must report any excess emissions other than startup, shutdown and malfunction excess emissions to the staff director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following:
  - a) Name and location of source;
  - b) Name and telephone number of person responsible for the source;
  - c) Identity and description of the equipment involved;
  - d) Time and duration of the period of excess emissions;
  - e) Type of activity;
  - f) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
  - g) Measures taken to mitigate the extent and duration of the excess emissions;
  - h) Measures taken to remedy the situation which cause the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring reports and compliance certification required by Section V of this permit.
3. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

<b>PERMIT CONDITION 006</b>	
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	
<b>Emission Point</b>	<b>Description</b>
EP-45	CI 4SLB Caterpillar emergency engine; diesel fueled; 402 hp; ca. 1991
EP-46	Caterpillar emergency engine; diesel fueled; 157 hp; ca. 2012

*Note: As of issuance of this permit, 10 CSR 10-6.260 is a Federal Only requirement<sup>5</sup>*

**Emission Limitation:**

1. The permittee shall not allow the emission in the atmosphere gases containing more than five hundred parts per million by volume (500 ppm<sub>v</sub>) of sulfur dioxide from the emission points.
2. Stack gases from the emission points shall not contain more than thirty five milligrams per cubic meter (35 mg/m<sup>3</sup>) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period.

**Monitoring/Recordkeeping:**

As required by Permit Condition 005.

**Reporting:**

1. The permittee shall report to the Air Compliance Coordinator at EPA Region VII at 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov) no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

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<sup>5</sup> This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable federal regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, Permit Condition 006 shall no longer be enforceable.

<b>PERMIT CONDITION 007</b>		
10 CSR 10-6.065 Voluntary Limitation(s)		
<b>Emission Point<sup>6</sup></b>	<b>Description</b>	<b>Control Device</b>
EP-04	Grain Receiving Railcar Unloading in Train Shed	CD10 (Baghouse)
EP-05	Flour Re grind Dust Collector	CD1 (Baghouse)
EP-07	Flour Re grind Pasta Mill Exhaust	CD3 (Baghouse)
EP-22	Flour Unloading Vacuum Exhaust	CD13 (Baghouse)
EP-41	Pasta 2 <sup>nd</sup> Floor Conveyor Dust Collector	CD25 (Dust Collector)
EP-42	Natural Cuts Bulk Powder Dumping Dust Collector	CD26 (Dust Collector)
EP-43	Final Dryer D Finished Goods Dust Collector	CD27 (Dust Collector)

**Operational Limitations:**

1. The permittee shall operate the control devices at specified in this permit condition at all times the associated emission points are operating.
2. The control devices shall be operated and maintained in accordance with the manufacturer’s specifications. The control devices 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 Missouri Department of Natural Resources’ employees may easily observe them.
3. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty.

**Monitoring/Recordkeeping:**

1. The permittee shall maintain an operating and maintenance log using Attachment D, or an equivalent tracking method, for each of the control devices that shall include the following:
  - a) Incidents of malfunction, with impacts on emissions, durations of events, probable causes and corrective actions.
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements.
2. The permittee shall monitor and record the operating pressure drop across the control devices at least once daily using Attachment G, or an equivalent.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65101 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<sup>6</sup> EP-06, EP-08, and EP-23 are not included in this permit condition because the use of their control devices is considered inherent. See Project No. 2013-02-003 and Project No. 2015-06-078.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

#### **10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

#### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

**10 CSR 10-6.165 Restriction of Emission of Odors**

**This is a State Only permit requirement.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

**10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

**Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
  - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
  - b) If a violation is noted, monitoring reverts to weekly.
  - c) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once per month.
    - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether equipment malfunctions contributed to an exceedance.
- 3) Any violations and any corrective actions undertaken to correct the violation.

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

**10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

**40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### **10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

**10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

**10 CSR 10-6.065(5)(C)1.A General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

None.

**10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

**10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

#### **10 CSR 10-6.020(2)(R)34 Responsible Official**

The application utilized in the preparation of this permit was signed by Todd Sherman, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;
  - or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## **VI. Attachments**

Attachments follow.





**Attachment C**

Method 9 Opacity Emissions Observations								
Company				Observer				
Location				Observer Certification Date				
Date				Emission Unit				
Time				Control Device				
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity		Average	
	Start	End		Sum				

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

Was the emission unit in compliance at the time of evaluation? \_\_\_\_\_  
 YES NO Signature of Observer



**Attachment E**  
**Monthly PM<sub>10</sub> Tracking Sheet**

This tracking sheet is for the period of \_\_\_\_\_ to \_\_\_\_\_.  
(month, year) (month, year)

<b>Emission Point</b>	<b>Description</b>	<b>Monthly Throughput</b>	<b>Emission Factor</b>	<b>Source (SCC)</b>	<b>Overall Control Efficiency</b>	<b>Monthly Emissions<sup>8</sup> (tons)</b>
EP-04	Grain Receiving Railcar Unloading in Train Shed	tons	0.0078 lb/ton	30200553	89.5%	
EP-05	Flour Regrind Dust Collector	tons	0.28 lb/ton	30201407	89.5%	
EP-06	Flour Regrind Pasta Receiving Filter Exhaust	tons	0.28 lb/ton	30201407	89.5%	
EP-07	Flour Regrind Pasta Mill Exhaust	tons	0.28 lb/ton	30201407	89.5%	
EP-08	Process Flour Holding Tank Dust Collector (Regrind Room)	tons	0.28 lb/ton	30201407	89.5%	
EP-15	Process Cheese Salt Handling Room	tons	0.28 lb/ton	30201407	0%	
EP-22	Flour Unloading Vacuum Exhaust	tons	0.28 lb/ton	30201407	99.5%	
EP-23	Flour Storage Silo	tons	0.28 lb/ton	30201407	99.5%	
EP-30A	Boiler #1 (Natural Gas)	MMcf	7.6 lb/MMcf	10200602	0%	
EP-30B	Boiler #1 (Distillate Oil)	1000gal	2.3 lb/1000gal	10200502	0%	
EP-31A	Boiler #2 (Natural Gas)	MMcf	7.6 lb/MMcf	10200602	0%	
EP-32B	Boiler #2 (Distillate Oil)	1000gal	2.3 lb/1000gal	10200502	0%	
EP-34	Salt Brine Silo	tons	0.28 lb/ton	30201407	0%	
EP-41	Pasta 2 <sup>nd</sup> Floor Conveyor Dust Collector	tons	0.28 lb/ton	30201407	99.5%	
EP-42	Natural Cuts Bulk Powder Dumping Dust Collector	tons	0.28 lb/ton	30201407	99.5%	
EP-43	Final Dryer D Finished Goods Dust Collector	tons	0.28 lb/ton	30201407	89.5%	
EP-45	West Side Emergency Diesel Engine; 3.04 MMBtu/hr	1000gal	16.35 lb/1000gal	20200401	0%	
EP-46	East Side Emergency Diesel Engine; 1.1 MMBtu/hr	1000gal	42.5 lb/1000gal	20200102	0%	
<b>Monthly Start-up, Shutdown, and Malfunction (SSM) PM<sub>10</sub> Emissions<sup>9</sup> (tons):</b>						
<b>Sum of Monthly PM<sub>10</sub> Emissions<sup>10</sup> (tons):</b>						
<b>Rolling 12-Month Total of PM<sub>10</sub> Emissions<sup>11</sup> (tons/year):</b>						

<sup>8</sup> [Monthly PM<sub>10</sub> Emissions] = [Monthly Throughput] × [Emission Factor] / 2000

<sup>9</sup> As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

<sup>10</sup> Sum of Monthly PM<sub>10</sub> Emissions includes SSM PM<sub>10</sub> emissions.

<sup>11</sup> The sum of the most recent 12 months of PM<sub>10</sub> emissions. Rolling 12-Month Total of PM<sub>10</sub> emissions must be below 100 tons/year in order to demonstrate compliance.

**Attachment F**  
 10 CSR 10-6.400 Exemption Demonstration

This attachment demonstrates compliance with 10 CSR 10-6.400.

<b>Emission Point</b>	<b>Description</b>	<b>MHDR</b>	<b>PM<sub>10</sub> EF</b>	<b>Source (SCC)</b>	<b>PTE Uncontrolled (lb/hr)</b>	<b>Limit (lb/hr)</b>	<b>Exempt?</b>
EP-04	Grain Receiving Railcar Unloading in Train Shed	92 tons/hr	0.0078 lb/ton	30200553	0.72	50.44	Yes, PTE < limit
EP-05	Flour Re grind Dust Collector	24 tons/hr	0.28 lb/ton	30201407	6.72	34.48	Yes, PTE < limit
EP-06	Flour Re grind Pasta Receiving Filter Exhaust	48 tons/hr	0.28 lb/ton	30201407	13.44	44.20	Yes, PTE < limit
EP-07	Flour Re grind Pasta Mill Exhaust	48 tons/hr	0.28 lb/ton	30201407	13.44	44.20	Yes, PTE < limit
EP-08	Process Flour Holding Tank Dust Collector (Re grind Room)	24 tons/hr	0.28 lb/ton	30201407	6.72	34.48	Yes, PTE < limit
EP-15	Process Cheese Salt Handling Room and Salt Brine Silo	0.86 tons/hr	0.28 lb/ton	30201407	0.24	-	Yes, PTE < 0.5 lb/hr
EP-22	Flour Unloading Vacuum Exhaust	68.7 tons/hr	0.28 lb/ton	30201407	19.24	47.58	Yes, PTE < limit
EP-23	Flour Storage Silo	12.5 tons/hr	0.28 lb/ton	30201407	3.50	22.27	Yes, PTE < limit
EP-34	Salt Brine Silo	12 tons/hr	0.28 lb/ton	30201407	3.36	21.67	Yes, PTE < limit
EP-41	Pasta 2 <sup>nd</sup> Floor Conveyor Dust Collector	24 tons/hr	0.28 lb/ton	30201407	6.72	34.48	Yes, PTE < limit
EP-42	Natural Cuts Bulk Powder Dumping Dust Collector	0.86 tons/hr	0.28 lb/ton	30201407	0.24	-	Yes, PTE < 0.5 lb/hr
EP-43	Final Dryer D Finished Goods Dust Collector	24 tons/hr	0.28 lb/ton	30201407	6.72	34.48	Yes, PTE < limit



# STATEMENT OF BASIS

## Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation.

## INSTALLATION DESCRIPTION

The Kraft Heinz Company is a food processing and manufacturing installation. The primary products are cheese, pasta, pasta sauces, and cream cheese. The processing activities include milling, cooking, and drying. Two 72.5 MMBtu/hr boilers use natural gas and distillate fuel oil. This facility is a synthetic minor emitter of particulate matter with an aerodynamic diameter of less than or equal to ten microns (PM<sub>10</sub>).

## Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>12</sup>
PM <sub>10</sub>	< 100
PM <sub>2.5</sub> <sup>13</sup>	< 100
CO	45.09
NO <sub>x</sub>	82.35
SO <sub>x</sub>	0.93
VOCs	14.19
HAPs	1.00

<sup>12</sup> Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The emergency engines were evaluated at 500 hours of uncontrolled annual operation. The other pollutants were proportionally reduced with respect to the PM<sub>10</sub> limitation.

<sup>13</sup> While there is no limit restricting PM<sub>2.5</sub> under 100 tons/year, PM<sub>2.5</sub> is a smaller component of PM<sub>10</sub>. As a result, by complying with the PM<sub>10</sub> limitation, the permittee will be emitting below 100 tons/year of PM<sub>2.5</sub>.

**Reported Air Pollutant Emissions, tons per year**

<b>Pollutants</b>	<b>2016</b>	<b>2015</b>	<b>2014</b>	<b>2013</b>	<b>2012</b>
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	5.35	5.35	5.35	2.37	2.37
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	3.66	3.66	3.66	2.37	2.37
Sulfur Oxides (SO <sub>x</sub> )	0.05	0.05	0.05	0.07	0.07
Nitrogen Oxides (NO <sub>x</sub> )	7.80	7.80	7.80	11.45	11.45
Volatile Organic Compounds(VOC)	0.70	0.70	0.70	5.34	5.34
Carbon Monoxide (CO)	6.53	6.53	6.53	9.62	9.62
Hazardous Air Pollutants <sup>14</sup> (HAPs)	-	-	-	0.37	0.37

**Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1. Intermediate Operating Permit Application, received October 21, 2015;
2. 2016 Emissions Inventory Questionnaire, received April 4, 2017; and
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4. Construction Permit 0898-097, issued August 12, 1998.

**Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

**Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

<sup>14</sup> HAPs below the EIQ reporting threshold for years in which no HAPs were reported.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

This rule does not apply. The boilers are exempt per 10 CSR 10-6.400(1)(B)(6) because they burn fuel for indirect heating. The engines are exempt because they do not meet the definition of process weight. The remaining PM-emitters are exempt per 10 CSR 10-6.400(1)(B)(16) due to their uncontrolled potential being lower than the maximum limit established in the rule or having a process weight of less than 0.5 lb/hr. See Attachment F.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

This rule does not apply. The boilers are exempt since they are only fueled by natural gas and fuel oil #2 (distillate) per 10 CSR 10-6.400(1)(E).

### **Construction Permit History**

Construction Permit 0898-197, issued August 12, 1998

This construction permit was for replacement boilers.

- The first special condition is in regards to alternative fuel switching. It states that no residual fuel oil may be used without prior approval by the SAQC. This condition is unnecessary and thus has not been included in this operating permit. This operating permit restricts the installation's fuel burning emission points to the use of either natural gas or distillate fuel oil. The permittee would have to submit an application for modification before using another fuel, such as residual fuel oil, or be in violation of this permit. Additionally, a modification to the construction permit may be required to authorize a change in fuel type.
- The second special condition is in regards to visible emissions observations. It states that daily opacity monitoring must be done on the two boilers. This condition is unnecessary and has not been included in this operating permit. This operating permit only requires opacity observations to be on days when a boiler is burning something other than natural gas. The combustion of natural gas is not expected to produce visible emissions.

### **New Source Performance Standards (NSPS) Applicability**

40 CFR 60 Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart applies to the boilers. However, the opacity limitations are automatically met when they are burning natural gas. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition*, states in 1.5.3.1 that liquefied petroleum gas does not produce visible emissions, even though it does produce a small amount of particulate matter. The same is true for natural gas. (See note (a) on Table 1.5-1 in that same section of AP-42.). Therefore these emission units will automatically be in compliance with this regulation when burning natural gas. Therefore, visible emissions monitoring is only required when the units combust diesel fuel.

40 CFR 60 Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This subpart does not apply to the 30,000-gallon fuel oil storage tanks. While the tanks have a capacity of about 113.6 m<sup>3</sup>, their maximum true vapor pressure is less than 15.0 kPa.

#### 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This subpart applies to the east side emergency engine, EP-46, and has been applied within this permit. This subpart does not apply to the west side emergency engine, EP-45, because it was constructed around 1991 (and has not been modified or reconstructed since), which is before the applicability date of this subpart.

#### **Maximum Achievable Control Technology (MACT) Applicability**

##### 40 CFR 63 Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart applies to the west side emergency engine, EP-45, and has been applied within this permit. This subpart also applies to the east side emergency engine, EP-46, which meets compliance with this subpart by complying with NSPS IIII.

##### 40 CFR 63 Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

This subpart does not apply to the boilers because the facility is already subject to another standard established under section 129 of the Clean Air Act (40 CFR 60, Subpart Dc).

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

#### **Greenhouse Gas Emissions**

The installation is assumed to be a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO<sub>2e</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2e</sub> emissions were not included within this permit.

#### **Other Regulatory Determinations**

##### 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule applies to the installation. The emergency engines are exempt per 10 CSR 10-6.220(1)(A).

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule applies. This rule was rescinded from the Missouri Code of State Regulations on November 30, 2015 but is still in the EPA approved SIP and is thus still an applicable federal requirement. EP-30 Boiler #1 and EP-31 Boiler #2 are exempt per 10 CSR 10-6.260(1)(A)2 due to being subject to an applicable sulfur compound limit under 10 CSR 10-6.070. See 40 CFR Part 63, Subpart Dc.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This rule applies to the installation. Once 10 CSR 10-6.261 is incorporated into the SIP it will become a federal requirement and will no longer be just a State Only requirement. The boilers are exempt per 10 CSR 10-6.261(1)(C)1 due to being subject to a more stringent sulfur limitation under 10 CSR 10-6.070. See 40 CFR Part 60, Subpart Dc.

**Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

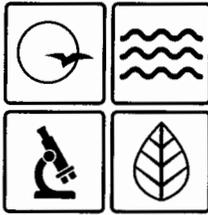
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

## **Response to Public Comments**

The operating permit draft for The Kraft Heinz Company was placed on public notice on September 1, 2017 for 30 days. During this period no comments were received.



Missouri Department of

dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

OCT 17 2017

Mr. Todd Sherman  
The Kraft Heinz Company  
2035 East Bennett  
Springfield, MO 65804

Re: The Kraft Heinz Company, 077-0026  
Permit Number: OP2017-075

Dear Mr. Sherman:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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 <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS:kwj

Enclosures

c: PAMS File: 2015-10-051



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