

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: OP2018-074

Expiration Date: AUG 20 2023

Installation ID: 019-0069

Project Number: 2015-10-013

Installation Name and Address

Quaker Manufacturing, LLC
4501 Route B
Columbia, MO 65202
Boone County

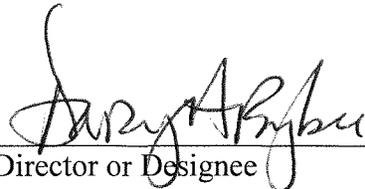
Parent Company's Name and Address

Quaker Oats Co.
555 W. Monroe Suite 13-03
Chicago, IL 60661-4714

Installation Description:

Quaker Manufacturing, LLC operates a rice cake production facility in Boone County. The rice and corn used by the installation is steam-tempered and then pressed into cakes by a machine. The cakes are flavored and then dried prior to packaging and shipping. The installation is a synthetic minor source of Volatile Organic Compounds (VOCs), located in an attainment area for all criteria pollutants.


Prepared by:
Bern Johnson
Operating Permit Unit


Director or Designee
Department of Natural Resources

AUG 20 2018

Effective Date

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
PERMIT CONDITION PW 1	4
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s).....	4
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	5
PERMIT CONDITION 1	5
10 CSR 10-6.060 Construction Permits Required.....	5
Construction Permit 022014-007 Issued February 20, 2014	5
PERMIT CONDITION 2	6
10 CSR 10-6.060 Construction Permits Required.....	6
Construction Permit #022017-012 Issued February 28, 2017	6
PERMIT CONDITION 3	7
10 CSR 10-6.070 New Source Performance Regulations	7
40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.....	7
PERMIT CONDITION 4	7
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	7
IV. CORE PERMIT REQUIREMENTS	9
V. GENERAL PERMIT REQUIREMENTS.....	15
VI. ATTACHMENTS	19
ATTACHMENT A.....	20
Method 22 Visible Emissions Observations.....	20
ATTACHMENT B.....	21
Fugitive Emission Observations	21
ATTACHMENT C	22
Method 9 Opacity Observations.....	22
ATTACHMENT D.....	24
Inspection/Maintenance/Repair/Malfunction Log.....	24
ATTACHMENT E.....	25
Custom Tracking Worksheets	25
ATTACHMENT F	27
Pressure Drop Log	27

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 Point #	Description
2	Large and Mini Oven Combustion; 24 MMBTU/hr total natural gas
3E	Direct Contact Water Heater - 10 MMBtu/hr natural gas
6	RCM Room Exhaust Hoods
10	RCM Room Ventilation
EP-11	grain receiving
EP-12	paved haul roads
EP-13	dry flavoring handling

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 Point #	Description
1	gas-fired steam boiler; 0.63 MMBTU/hr natural gas
3 (except E)	Water Heaters; 1.215 MMBTU/hr total natural gas
4	Make Up Air Units; 5.95 MMBTU/hr total natural gas
5	Gas Heaters; 0.48 MMBTU/hr total natural gas
7	Parts Washer
9	HVAC Units; 0.437 MMBTU/hr total natural gas

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.

PERMIT CONDITION PW 1

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOC) from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of VOC emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment E).
- 2) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Reporting:

- 1) The permittee shall report any exceedance of the emission limit above no later than ten days after the end of the month during which the exceedance occurs.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

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.

PERMIT CONDITION 1	
10 CSR 10-6.060 Construction Permits Required Construction Permit 022014-007 Issued February 20, 2014	
Emission Unit	Description
EP-2	Large and Mini Oven Combustion; 24 MMBTU/hr total natural gas

Operational Limitation:

- 1) The permittee shall keep liquid flavorings in sealed containers whenever the materials are not in use. It shall provide and maintain suitable, easily read, permanent markings on all liquid flavorings used with this equipment [Special Condition 6].
- 2) Before using an alternative flavoring at on the mini rice cake line, the permittee shall calculate potential VOC emissions from the alternative flavoring. Current flavorings are Givaudan Apple Cinnamon 344215, Givaudan Caramel XO-868-948-7, and Givaudan Brown Sugar 676138 [Special Condition 7.A.].
- 3) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative flavoring if the VOC emissions from the alternative flavoring exceed 266.90 tpy. [Special Condition 7.B.]

Monitoring/Recordkeeping:

- 1) The permittee shall keep records of VOC PTE calculations if alternate flavorings are used (see Attachment E).

Reporting:

- 1) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements in the annual compliance certification.
- 2) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

PERMIT CONDITION 2	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit #022017-012 Issued February 28, 2017	
Emission Unit	Description
EP-2	line ovens
EP-6	line exhaust hoods
EP-10	RCM room exhaust
EP-11	grain receiving
EP-12	paved haul roads
EP-13	dry flavoring handling

Emission Limitation:

The permittee shall emit less than 24.58 tons of PM_{2.5} from these units in any rolling 12-month period. [Special Condition 3.A]

Operational Limitation:

- 1) The permittee shall capture emissions from EP-6 (all mini- and large-cake lines) using hood(s). [Special Condition 4.A]
- 2) The permittee shall design and construct each hood according to the specifications of the existing Mini Line 1 and 2 hoods. Design records shall be kept onsite. [Special Condition 4.C]
- 3) The permittee shall control emissions from the RCM Mini Line hoods using filters of at least two plies. [Special Condition 5.A]
 - a) The filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. [Special Condition 5.B]
- 4) The permittee shall develop a written standard operating procedure to monitor pressure drop and filter condition. The pressure drop across the filters shall be recorded at least once daily (Attachment F or equivalent). Normal operation and replacement parameters shall be indicated. The standard operating procedure shall be kept on site. [Special Condition 5.C]
- 5) The permittee shall operate the filters according to the standard operating procedure. The operating pressure drop shall be maintained within the specifications of the standard operating procedure. [Special Condition 5.D]
 - a) Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 5.E]
- 6) The permittee shall maintain an operating and maintenance log (Attachment D or equivalent) for the filters which shall include the following: [Special Condition 5.FA]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of PM_{2.5} emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment E).
- 2) The permittee shall keep a copy of this operating permit, copies of all issued construction permits, and copies of all Safety Data Sheets (SDS) on site.
- 3) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Reporting:

- 1) The permittee shall report any exceedance of the emission limit above no later than ten days after the end of the month during which the exceedance occurs.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

PERMIT CONDITION 3	
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 Unit	Description
3E	Direct Contact Water Heater - 10 MMBtu/hr natural gas

Recordkeeping:

- 1) The permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [§60.48c(g)(1)]
- 2) As an alternative to meeting the requirements of 1), the permittee may elect to record and maintain records of the amount of fuel combusted during each calendar month. [§60.48c(g)(2)]

PERMIT CONDITION 4	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-6	line exhaust hoods
EP-10	RCM room exhaust
EP-13	dry flavoring handling

note: because all emission points are enclosed inside the main building, only one Method 22 is required for the entire facility.

Emission Limitation:

The permittee shall not cause or permit to be discharged into the atmosphere from the facility any visible emissions in excess of 20 percent. Since all emission units are contained inside the main building, only one observation is required for the entire facility.

Monitoring:

- 1) The permittee shall conduct visible emissions observations for the entire facility using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when emission units are operating and when the weather conditions allow. If the permittee observes no visible emissions using these procedures, then no further observations are required. If visible emissions are observed, 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.
- 4) The renewal of an operating permit does not require the installation to revert to weekly monitoring; instead, it should continue with the monitoring regime it is under at the time of issuance of the renewal permit.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment A (or its equivalent), 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.

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 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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 full EIQs per the schedule in the rule. 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 B, 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

This is a State Only permit requirement.

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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 or AirComplianceReporting@dnr.mo.gov.
 - 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.
- 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 Cole Knudsen, Plant Director. 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 A

Method 22 Visible Emissions Observations					
Installation Name			Observer Name		
Location			Date		
Sky Conditions			Wind Direction		
Precipitation			Wind Speed		
Time			Emission unit		
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.					
Minute	Seconds				Comments
	0	15	30	45	
	Visible Emissions Yes (Y) or No (N)				
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment C

Method 9 Opacity Observations									
Installation Name:					Sketch of the observer's position relative to the emission unit				
Emission Point:									
Emission Unit:									
Observer Name and Affiliation:									
Observer Certification Date:									
Method 9 Observation Date:									
Height of Emission Point:									
Time:					Start of observations	End of observations			
Distance of Observer from Emission Point:									
Observer Direction from Emission Point:									
Approximate Wind Direction:									
Estimated Wind Speed:									
Ambient Temperature:									
Description of Sky Conditions (Presence and color of clouds):									
Plume Color:									
Approximate Distance Plume is Visible from Emission Point:									
Minute	Seconds				1-minute Avg. % Opacity ¹	6-minute Avg. % Opacity ²	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
Opacity Readings (% Opacity) ³									
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
12									

¹ 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.

² 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.

³ Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

ATTACHMENT E
Custom Tracking Worksheets

Plantwide PW 1 emission limit:

- Permit Condition PW 1 of this operating permit limits the emissions of volatile organic compounds (VOCs) emitted by this installation to less than 100 tons of VOCs in any rolling 12-month period. When calculating the total emissions, be sure to include emissions from all emissions sources at this installation, listed on page 3 of this operating permit as EP-01 through EP-13. Emissions may be grouped by type; for example, all natural gas combustion sources may be grouped and tracked together by fuel usage.
- Record at a minimum the following information:
 - The material usage for all large and mini-ovens (EP-02) in gallons; use product information (SDS or other) to derive the mass of VOCs emitted by multiplying density and percentage of VOCs in the flavoring. Calculate monthly VOC emissions by multiplying the mass of VOCs in the flavoring by the monthly usage.
 - The fuel consumption in MMSCF for all combustion sources; use the emission factor of 5.5 lbs/MMSCF from AP-42 Table 1.4-2.
 - Solvent usage from EP-7; use product information (SDS or other) for VOC content. If a range is given, use the higher value.
- Calculate monthly VOC emissions by multiplying throughput and emission factor for each type.
- Calculate rolling 12-month VOC emissions by adding current month's emissions to previous eleven months emissions
- Compare emission total to limit and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with 10 CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

Permit Condition 1 PTE calculation:

- Per Special Condition 7.B. of construction permit #022014-007 , incorporated in this operating permit as Permit Condition 1, calculate the PTE of VOC of any new flavoring.
- PTE calculation consists of the following:
 - flavoring name and/or designation;
 - application rate in lb flavoring/1,000 cakes;
 - combined maximum hourly design rate (MHDR) of all mini-cake lines in 1,000 cakes/hour;
 - calculate flavoring rate in lb/hr by multiplying application rate by MHDR;
 - record or calculate the flavoring's VOC content using the sum of the maximum individual VOC ingredient weight % from the safety data sheet;
 - calculate flavoring VOC PTE by multiplying the flavoring rate * VOC content * 8,760 hours/year / 2,000 lbs/ton.
 - Seek approval from the Air Pollution Control Program if the VOC PTE is greater than 266.90 tpy.

Permit Condition 2 emission limits:

- Per Special Condition 13.A of construction permit #022017-012 , incorporated in this operating permit as Permit Condition 2, track and record the emissions of fine particulate matter (PM_{2.5}) from emission points EP-2, -6, and -10 thru -13 to insure that the emissions of PM_{2.5} will not exceed 24.58 tons of PM_{2.5} in any twelve month period.
- Record at a minimum the following information:
 - Record the monthly grain received, in tons; use emission factor of 0.0013 lbs PM_{2.5}/ton grain (from CP #022017-012).
 - Record the monthly mini-cakes produced, in tons; use comprehensive emission factor of 1.7197 lbs PM_{2.5}/ton mini-cakes (from CP #022017-012).
 - Record the monthly large cakes produced, in tons; use comprehensive emission factor of 1.8701 lbs PM_{2.5}/ton large cakes (from CP #022017-012).
 - Record the monthly dry flavoring received, in tons; use comprehensive emission factor of 0.1825 lbs PM_{2.5}/ton dry flavoring (from CP #022017-012).
- Calculate monthly PM_{2.5} emissions by multiplying the amount of grain and dry flavoring received and the amount of mini- and large cakes produced by their respective emission factors.
- Calculate rolling 12-month emissions of PM_{2.5} by adding current month's emissions to previous eleven months emissions.
 - Add 0.07 tons to rolling 12-month total to account for EP-11, -12, and -13.
- Compare emission total to limit and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with IO CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

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. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

INSTALLATION DESCRIPTION

The facility receives raw corn and rice cereal grain, and processes the materials into cakes using rice cake machines (RCMs) arranged in five production lines. Each production line includes multiple RCMs. The RCMs form the raw corn and rice into round cakes, which are then deposited onto a conveyor. Quaker uses two types of RCMs at the facility: large RCMs that have two heads per machine and produce one large rice cake per head; and mini rice cake machines that have two heads per machine and produce eight cakes per head. The rice cakes are then coated with flavoring syrup and baked in one of five natural gas-fired ovens (EP-02A through EP-02E). After cooling, the cakes are packaged and shipped offsite.

The formation of cakes in the RCMs generates particulates, which Quaker captures via multiple vent hoods above each RCM (EP-06A through EP-06I). The individual RCM hoods contain filters to reduce particulate emissions, and are ducted together to a common flue for each production line. The facility has the ability to operate five production lines: two mini-cake lines and three large-cake lines. Rooms containing RCMs are equipped with exhaust fans which vent to the atmosphere (EP-10A through EP-10D).

The installation is a synthetic minor source of Volatile Organic Compounds (VOCs), located in an attainment area for all criteria pollutants. It has one water heater subject to NSPS Subpart Dc. It is not a named installation and fugitive sources are not counted towards PTE calculations.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions

Pollutants	Potential Emissions ¹ (Conditioned Limit)	Reported Emissions (tpy)				
		2017	2016	2015	2014	2013
PM ₁₀	21.58	13.78	14.32	13.91	13.92	15.14
PM _{2.5}	21.57	13.77	14.31	13.90	13.91	15.14
SO _x	0.14	0.01	0.01	0.01	0.01	0.01
NO _x	22.78	1.19	0.93	0.79	0.92	1.32
VOC	< 100	55.80	54.70	46.26	37.45	46.10
CO	19.14	1.00	0.78	0.66	0.77	1.11
HAPs	0.43	0.02	0.02	0.02	0.02	0.02

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation except VOC sources, for which a 100 tons per year emissions limit exists.

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 2, 2015;
- 2) 2017 Emissions Inventory Questionnaire, received April 16, 2018;
- 3) Construction Permit 1294-002, issued May 1, 1996;
- 4) Construction Permit 0596-005A, issued December 14, 2009;
- 5) Construction Permit 092010-110, issued September 27 2010;
- 6) Construction Permit 022014-007 Issued February 20, 2014;
- 7) Construction Permit 022017-012, issued February 28, 2017;
- 8) WebFIRE; and
- 9) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*/10 CSR 10-6.261 *Control of Sulfur Dioxide Emissions* – these rules do not apply because all combustion units use pipeline grade natural gas exclusively.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes* is not applicable to the installation. The following PM emission units are indirect heating sources exempt per 10 CSR 10-6.400(1)(B)6: Burning of fuel for indirect heating.

Emission Unit	Description
1	gas-fired steam boiler
3	Water Heaters
4	Make Up Air Units
5	Gas Heaters
9	HVAC Units

Emission units 2, 6, and 10 are exempt under 10 CSR 10-6.400(1)(B)16: Process weight rule.
Maximum Allowable PM Emissions $E = 4.10P^{0.67}$

P = Process weight rate (tons/hr i.e. MHDR)
 E = Allowable emission rate limit (lb/hr)

Table 1 – Determination of 10 CSR 10-6.400 PM limit

Emission Unit	MHDR (tons per hour)	Allowable Emission Rate (lbs/hr)	Emission Factor (lbs/ton)	Pre-Control PTE (lbs/hr)
EP-02 A-B	0.0088	0.172	8.44	0.07
EP-02 C-E	0.0147	0.243	2.67	0.04
EP-06	1.23	4.71	1.30	1.60
EP-10	2.78	8.14	0.5	1.40

Emission units EP-11 and -12 are fugitive sources and exempt under 10 CSR 10-6.400(1)(B)7 Fugitive sources. Emission unit EP-13 has a maximum PTE of 0.007 lbs/hr and is exempt under 10 CSR 10-6.400(1)(B)12. Emission units less than 0.5 lbs/hr.

Construction Permit History

Construction Permit 1294-002 issued May 1, 1996 –

Construction Permit 0596-005A issued December 14, 2009 – this permit added some previously overlooked sources, which increased PTE and required the facility to obtain an operating permit.

Construction Permit 092010-110 issued September 27 2010 – installation of a new exhaust hood and relocating some equipment and controls to increase production.

Construction Permit 022014-007 issued February 20, 2014 – addition of mini-cake line 5 and modification of existing mini-cake lines. All conditions except 6 & 7 were superseded by a subsequent permit.

Construction Permit 022017-012 issued February 28, 2017 – new mini-cake drying oven for line 5 to increase production. This permit superseded and replaced all conditions from previous permits, except 6 & 7 from 022014-007. The 250 tpy VOC limit in Special Condition 2.A. is not repeated in this document because of the stricter limit in PW1.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Dc *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* – this rule applies only to a water heater, EP-3E. Because of its small size (10 MMBTU/hr) and sole use of natural gas, the only requirement is to track fuel usage.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart JJJJJ *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* – this rule does not apply because boiler EP-1 combusts only natural gas.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

10 CSR 10-6.405 Restriction of *Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* is an applicable rule. 10 CSR 10-6.405(1)(C) states that an emission unit fueled by natural gas is deemed to be in compliance.

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

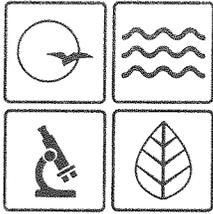
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 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

A draft of the Intermediate Operating Permit for Quaker Manufacturing was placed on public notice on July 13, 2018 by the Missouri Department of Natural Resources (MDNR). No public comments were submitted to the Air Pollution Control Program regarding this permit.



Missouri Department of

dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

AUG 20 2018

Mr. Cole Knudsen
Quaker Manufacturing, LLC
4501 Route B
Columbia, MO 65202

Re: Quaker Manufacturing, LLC, 019-0069
Permit Number: OP2018-074

Dear Mr. Knudsen:

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:bjj

Enclosures

c: PAMS File: 2015-10-013



Recycled paper