

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 052011-004 Project Number: 2010-11-010

Parent Company: Schreiber Food, Inc.

Parent Company Address: 502 N. Madison Street, Green Bay, WI 54301

Installation Name: Schreiber Food, Inc.

Installation Number: 009-0021

Installation Address: 10 Dairy Street, Monett, MO 65708

Location Information: Barry County, S31, T26N, R27W

Application for Authority to Construct was made for:

The installation of two new boilers that will replace an existing boiler (EP-02). This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAR 10 2011

EFFECTIVE DATE



DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Schreiber Food, Inc.
Barry County, S31, T26N, R27W

1. Emission Limitation
 - A. Schreiber Food, Inc. shall emit less than 40.0 tons of sulfur dioxides (SO_x) in any consecutive 12-month period from the two new boilers (EP-04 and EP-05)
 - B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.
2. Sulfur Content of Fuel
 - A. The sulfur content of the No. 2 fuel oil to be used in the boilers (EP-04 and EP-05) shall not exceed 0.2% by weight.
 - B. Schreiber Foods, Inc -- Monett shall obtain the sulfur content of No. 2 fuel oil at least once every three months from either the fuel vendors or conduct their own fuel analysis to evaluate the typical sulfur content weight percent of the fuel oil. If a particular type of fuel is not used during the three (3)-month period and no new fuel of that type is purchased, then no testing is required.
 - C. The fuel consumption records and statements shall be kept on-site for five (5) years and shall be made immediately available to the Missouri Department of Natural Resources' personnel upon request.
3. Record Keeping and Reporting Requirements
 - A. Schreiber Food, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - B. Schreiber Food, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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SPECIAL CONDITIONS:

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

4. Schreiber Food, Inc. shall only burn No. 2 fuel oil and natural gas in the two new boilers (EP-04 and EP-05)

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

Project Number: 2010-11-010
Installation ID Number: 009-0021
Permit Number:

Schreiber Food, Inc.
10 Dairy Street
Monett, MO 65708

Complete: November 1, 2010

Parent Company:
Schreiber Food, Inc.
502 N. Madison Street
Green Bay, WI 54301

Barry County, S31, T26N, R27W

REVIEW SUMMARY

- Schreiber Food, Inc. has applied for authority to install two new 24.52 MMBtu per hour boilers that will replace an existing 55.5 MMBtu per hour boiler (EP-02).
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment.
- 40 CFR 60 Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" applies to the equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of SO_x are conditioned below de minimis levels.
- This installation is located in Barry County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

- Ambient air quality modeling was not performed since potential emissions of the application are conditioned below de minimis levels.
- Emissions testing is required by 40 CFR 60 Subpart Dc for the two new boilers.
- An Intermediate Operating Permit amendment is required for this installation within 90 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

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

Schreiber Foods (County-Plant # 009-0021) and Dairy Farmers of America (County-Plant # 009-0030) are considered one installation for permitting purposes. They are considered a minor source for New Source Review based upon their Intermediate Operating Permit.

An Intermediate Operating Permit (OP2010-017) was issued to Dairy Farmers of America in November of 2005. An Intermediate Operating Permit (OP2010-013) was issued to Schreiber Foods in February of 2010. The following New Source Review permits have been issued to Schreiber Foods and Dairy Farmers of America from the Air Pollution Control Program.

Table 1: Permit History for Schreiber Foods and Dairy Farmers of America

Permit Number	Description
052004-006	Installation of 55.5 MMBtu per hour dual-fired boiler.
102004-011	Installation of biogas flare.
122006-013	Temporary permit to combust biofuel oil in boiler #1.
122007-001	Capability to burn RES biofuel and No. 2 distillate fuel oil in the existing boilers (EP-01 and EP-02)
122007-001A	Modify Sulfur content of RES fuel
112010-001	Temporary Boiler

PROJECT DESCRIPTION

Schreiber Foods is installing two new 24.52 MMBtu per hour boilers to replace an existing boiler (EP-02) that is no longer operational. The existing boiler will be removed during the new boiler construction. The new boiler will burn mainly natural gas and use No. 2 fuel oil as a backup fuel. There will be no emission control equipment installed on the new boilers.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.3, *Fuel Oil Combustion (9/98)*, Section 1.4, *Natural Gas Combustion (7/98)*. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year.) The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	*Existing Potential Emissions	Existing Actual Emissions (2009 EIQ)	Potential Emissions of the New Boilers (Natural Gas)	Potential Emissions of the New Boiler (Fuel Oil #2)	**Application Conditioned Potential Emissions
PM _{2.5}	10.0	N/A	0.21	1.60	3.27	N/A
PM ₁₀	15.0	86.2	4.22	1.60	3.66	N/A
SO _x	40.0	2051.3	12.41	0.13	44.19	<40.00
NO _x	40.0	127.9	13.62	21.06	30.69	N/A
VOC	40.0	2.5	0.61	1.16	0.31	N/A
CO	100.0	86.2	10.76	17.69	7.67	N/A
HAPs	10.0/25.0	0.9	0.00	0.40	0.07	N/A

N/A = Not Applicable

*Existing Potential Emissions were taken from permit number 122007-001A.

**Application Conditioned Potential Emissions based on a voluntary SO_x limit. The SO_x limit is required for this project to be considered a de minimis modification. The Application Conditioned Potential Emissions are based on #2 fuel oil combustion for 8760 hours.

The two new boilers (EP-04 and EP-05) being installed at Schreiber Foods are subject to Missouri State Rule 10 CSR 10-3.060 *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*. Schreiber Foods is below the particulate matter emission limits found in the rule above therefore they are in compliance with this rule.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of SO_x are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Schreiber Food, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record

keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for a hard copy submittal or May 1 for online submittal for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-3.090*

SPECIFIC REQUIREMENTS

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

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Gerad Fox
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 29, 2010, received November 1, 2010, designating Schreiber Food, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Ms. Colleen Geurts
Compliance Manager
Schreiber Food, Inc.
502 N. Madison Street
Green Bay, WI 54301

RE: New Source Review Permit - Project Number: 2010-11-010

Dear Ms. Geurts:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Gerad Fox at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:gfk

Enclosures

c: Southwest Regional Office
PAMS File: 2010-11-010

Permit Number: