



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE 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.

Operating Permit Number: OP2012-015
Expiration Date: APR 02 2017
Installation ID: 083-0033
Project Number: 2011-03-027

Installation Name and Address

Schreiber Foods, Inc. - Capri I
912 East Nusbaum Place
Clinton, MO 64735
Henry County

Parent Company's Name and Address

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

Installation Description:

Schreiber Foods, Inc. – Capri I is a flexographic printing facility producing cheese wrappers. The installation is a synthetic minor source of Volatile Organic Compounds (VOC).

APR 03 2012

Effective Date

Kyra L Moore

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Schreiber Foods, Inc. – Capri I is a flexographic printing facility producing cheese wrappers. The installation is a synthetic minor source of Volatile Organic Compounds (VOC).

In previous operating permits Schreiber Foods, Inc. – Capri I (083-0033) and Schreiber Foods, Inc. – Capri II (083-0046) were permitted together. The installations do share a common SIC code and some common management, but the two installations are not adjacent to one another and do not support one another; therefore, the installations are viewed as two separate facilities with two separate potentials to emit (PTEs) for permitting purposes.

Reported Air Pollutant Emissions, tons per year¹					
Pollutants	2010	2009	2008	2007	2006
Carbon Monoxide (CO)	0.66	0.57	0.54	0.54	0.56
Nitrogen Oxides (NO _x)	0.78	0.68	0.65	0.64	0.66
Primary Particulate Matter ≤ Ten Microns (PM ₁₀)	0.06	0.05	0.05	0.05	0.05
Primary Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.06	0.05	0.05	0.05	0.05
Sulfur Oxides (SO _x)	0.0004	0.0004	0.0004	0.0004	0.0004
Volatile Organic Compounds (VOC)	58.51	69.13	66.13	66.44	59.76

¹During emission years 2006 – 2010 both Capri I and Capri II emissions were included under 083-0033; however, for emission years 2011 and beyond only Capri I will be reported under 083-0033. Capri II will be reported under 083-0046 for emission years 2011 and beyond.

Note: The installation does emit small amounts of Hazardous Air Pollutants (HAPs) from the combustion of natural gas; however, actual emissions of HAPs are below the reporting thresholds of 0.01 ton/yr for Category One HAPs and 0.1 ton/yr for Category Two HAPs within 10 CSR 10-6.110.

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description
1B	Flexopress #1
2B	Flexopress #2
3B	Flexopress #3

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit	Description
1A	0.8 MMBtu/hr Natural Gas Fired Drying Oven #1
2A	1.6 MMBtu/hr Natural Gas Fired Drying Oven #2
3A	1.6 MMBtu/hr Natural Gas Fired Drying Oven #3
	(2) Parts Washers

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 as of the date that this permit is issued.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0696-007, Issued June 4, 1996

Emission Limitation:

Special Condition 1: The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

Operational Limitation:

1. Special Condition 5: Cleanup solvent shall be kept in tightly covered tanks or containers during transport and storage. Cleaning cloths used with the cleanup solvents shall be placed in tightly closed containers when not in use and while awaiting off-site transportation.
2. Special Condition 6: If in the opinion of the Director, a continuing situation of demonstrated nuisance odors exists for the neighbors of the facility, the Director may require the permittee to submit a corrective action plan adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of this permit.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall record the monthly and the sum of the most recent 12 months of VOC emissions (in tons) from the installation using Attachment B or an equivalent form generated by the permittee. These records shall be retained on-site for the most recent five years of operation and shall be made immediately available to Department of Natural Resources' personnel upon request. The monthly logs shall be based upon the total amount of VOC containing materials used.
2. Records may be retained electronically or in paper form.

Reporting:

1. Special Condition 3: The permittee 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 records indicate and exceedance of the 100 ton VOC emission limitation.
2. The permittee shall report any deviations from the emission limitation, operational limitations, monitoring/recordkeeping, 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 as of the date that this permit is issued.

PERMIT CONDITION 001		
10 CSR 10-6.060 Construction Permits Required Construction Permit 1199-008, Issued November 5, 1999		
Emission Unit	Description	Control Device
EP1B	Flexopress #1	CD1 Catalytic Oxidizer #1
EP2B	Flexopress #2	
EP3B	Flexopress #3	

Operational Limitations:

1. Special Condition 1: CD1 Catalytic Oxidizer #1 shall be in use at all times EP1B, EP2B, and EP3B Flexopresses #1, #2, and #3 are in operation or any time that regulated Volatile Organic Compound (VOC) emissions are possible. The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer’s specifications. CD1 Catalytic Oxidizer #1 shall achieve a VOC destruction removal efficiency (DRE) of at least 98 percent.
2. The operating temperature of the catalytic oxidizer shall be continuously monitored and recorded any time the flexographic presses are in operation or any time that regulated VOC or hazardous air pollutant (HAP) emissions are possible. The temperature shall be maintained within ten percent of 500°F . The most recent 60 months of records shall be retained on-site and shall be made immediately available to Department of Natural Resources’ personnel upon request.

Monitoring/Recordkeeping:

1. The permittee shall retain the required temperature records.
2. The permittee shall retain the most recent performance testing results of CD1 Catalytic Oxidizer #1.
3. The permittee shall retain records of inspection, maintenance, and malfunction for the catalytic oxidizer using Attachment A or an equivalent form generated by the permittee.
4. Records may be kept electronically or in paper form.

Reporting:

The permittee shall report any deviations from the operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

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 is only an excerpt from the regulation or code, and is 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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.
 - b) Yard waste.
- 3) 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 permittee fails to comply with the conditions or any provisions of the permit.
- 4) The permittee may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if the permittee fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)5, the Director shall not issue a permit under this section unless the permittee can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. 40 CFR Part 60, Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245-60.2260. The provisions of 40 CFR Part 60, Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with 40 CFR Part 60, Subpart CCCC sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A – *Test Methods*, Method 9 – *Visual Determination of the Opacity of Emissions from Stationary Sources*. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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) Best 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 information listed in Paragraph 1 to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, 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, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under RSMo §643.140, 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 information listed in Paragraph 1 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 RSMo §643.080 or §643.151.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action under RSMo §643.080, §643.090 and §643.151 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. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(5)(C)1 and (6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(5)(C)1 and (6)(C)3.B]

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

- 1) 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*.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit 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) The permittee may be required by the Director to file additional reports.
- 3) 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.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 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.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Sections (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the Director. The reports shall be submitted to the Director by April 1st after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1st.
- 8) The reporting period shall end on December 31st of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The Director may require the permittee to perform 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 permittee 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 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

The permittee shall not 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

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. Each individual who works in asbestos abatement projects shall first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations shall first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status shall allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 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 shall bear the required warning statement if it is being introduced into interstate commerce per §82.106.
 - b) The placement of the required warning statement shall comply with §82.108.
 - c) The form of the label bearing the required warning statement shall comply with §82.110.
 - d) The permittee may not modify, remove, or interfere with the required warning statement except as described in §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:
 - a) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices of §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment within §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program per §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances shall comply with the recordkeeping requirements of §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements of §82.156.
 - f) Owners/operators of appliances normally containing 50 pounds or more of refrigerant shall retain records of refrigerant purchased and added to such appliances per §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 of 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 of 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 is allowed to switch from any ozone-depleting substance to any alternative that is listed in 40 CFR Part 82, Subpart G, *Significant New Alternatives Policy Program*. 40 CFR Part 82 is enforceable by the federal government, but no by the State of Missouri.

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 by a permittee:
 - 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.

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)(E)2 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.

10 CSR 10-6.065(5)(C)1 General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - 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 retained 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's 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, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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 10 CSR 10-6.065(6)(C)7 *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 permittee shall show that the installation 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 shall 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, a report for a deviation that must be submitted within ten days after the deviation 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 Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68 *Accidental Release Prevention Requirements*. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by §68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under §68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

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

- 1) The permittee shall 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

- 1) The permittee may switch solvents, inks, and/or extenders at any time, provided the following conditions are met:
 - a) The new solvent/ink/extender shall contain no Hazardous Air Pollutants.
 - b) Volatile Organic Compound emissions from the new solvent/ink/extender shall be included in the calculations to demonstrate compliance with the 100 ton per year VOC emission limitation of Permit Condition PW001.

10 CSR 10-6.065(5)(B)4, (5)(C)1, and (5)(C)3 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 are retained under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that the permittee is required to retain 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 annually (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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances shall 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 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(C)1 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 shall 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 shall 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 shall 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 recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee shall provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. 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 retain 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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Richard D. Heck, 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 permittee 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 permittee 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 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources or the U.S. 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) The Missouri Department of Natural Resources or the U.S. 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 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.

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.

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 Renewal Application, received March 10, 2011
- 2) 2010, 2009, 2008, 2007, and 2006 Emissions Inventory Questionnaires
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) U.S. EPA's Factor Information Retrieval (FIRE) Date System version 6.25
- 5) Construction Permit 0794-019, Issued July 1, 1994
- 6) Construction Permit 0495-009, Issued March 16, 1995
- 7) Construction Permit 0696-007, Issued June 4, 1996
- 8) No Construction Permit Required Determination, Issued April 19, 1996
- 9) Construction Permit 0996-018, Issued September 20, 1996
- 10) Construction Permit 1199-008, Issued November 5, 1999:

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable to the installation and has not been applied within this permit. The installation is located in an ozone attainment area and, therefore, does not meet the applicability requirements of 10 CSR 10-6.100(1)(A).

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. The installation exclusively combusts pipeline grade natural gas and is, therefore, exempt from this regulation per 10 CSR 10-6.260(1)(A)2.

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* is not applicable to the installation and has not been applied within this permit. Natural gas does not meet the definition of process weight within 10 CSR 10-6.400(2)(A).

Construction Permits

Construction Permit 0794-019, Issued July 1, 1994:

- ◆ This general construction permit is for the installation of EP1A Drying Oven #1 and EP1B Flexopress #1. The flexopress is an eight-color press which will be used to printing packaging to wrap the cheese produced by the facility's existing cheese manufacturing process. The press has a maximum print width of 29", a maximum linear speed of 800 ft/min, and a maximum application rate of 0.0008 ft²/min.
- ◆ The conditions of this construction permit are superseded by Construction Permit 0696-007.

Construction Permit 0495-009, Issued March 16, 1995:

- ◆ This de minimis construction permit was for the installation of two natural gas fired boilers, one 150 HP and one 300 HP. These emission units are not located at the installation; therefore, this construction permit is no longer applicable to the installation.

Construction Permit 0696-007, Issued June 4, 1996:

- ◆ This general construction permit is for the installation of EP2A Drying Oven #2 and EP2B Flexopress #2. EP2B Flexopress #2 is identical to EP1B Flexopress #1.
- ◆ This construction permit supersedes Construction Permit 0794-019.
- ◆ Special Conditions 1, 2, 3, 5, and 6 have been applied within this permit (see Permit Condition PW001).
- ◆ Special Condition 4 implements a low solvent ink technology testing program. The program was to be completed and results submitted by no later than October 19, 1997.

No Construction Permit Required Determination, Issued April 19, 1996:

- ◆ This no construction permit required determination is for the installation of a laminator and two slitter for lamination film production. The MSDS submitted with this application stated that the film contained no VOC or HAPs.

Construction Permit 0996-018, Issued September 20, 1996:

- ◆ This de minimis construction permit is for the installation of two Cyrel plate making processes, EP3 and EP4. EP3 and EP4 were previously associated with Schreiber Foods, Inc. (083-0033); however, when Schreiber Foods, Inc. split into Capri I (083-0033) and Capri II (083-0046) the equipment was determined to belong to Capri II. As EP3 and EP4 are not located at Capri I they are not discussed within this permit. This construction permit is not applicable to Capri I (083-0033), the construction permit has been transferred to Capri II (083-0046) within the Air Pollution Control Program's files.

Construction Permit 1199-008, Issued November 5, 1999:

- ◆ This general construction permit is for the installation of EP3A Drying Oven #3, EP3B Flexopress #3, and CD1 Catalytic Oxidizer for EP1, EP2, and EP3. EP3B Flexopress #3 is identical to EP1B and EP2B Flexopresses #1 and #2.
- ◆ Special Conditions 1 and 2 have been applied within this permit (see Permit Condition 001).
- ◆ Special Condition 3 required performance testing to determine the DRE of CD1 Catalytic Oxidizer #1. Performance testing was conducted March 21, 2000. The documented DRE was 99.4 percent. With an assumed capture efficiency of 85 percent the overall control efficiency is 84.49 percent.

- ◆ Special Condition 4 requires compliance with 10 CSR 10-6.165 *Restriction of Emission of Odors*. 10 CSR 10-6.165 has been applied within this permit (see Section IV. Core Permit Requirements).
- ◆ Special Condition 5 requires the installation to apply for an Intermediate Operating Permit and limit their VOC emissions to 100 tons per year. Issuance of this operating permit is deemed compliance with this special condition.

New Source Performance Standards (NSPS) Applicability

None.

Maximum Achievable Control Technology (MACT) Applicability

The installation is an area source of Hazardous Air Pollutants (HAPs).

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. The installation does have two parts washers; however, neither of the parts washer use a solvent containing methylene chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5), or chloroform (67-66-3) and, therefore, do not meet the applicability requirements of §63.460(a).

40 CFR Part 63, Subpart KK – *National Emission Standards for the Printing and Publishing Industry* is not applicable to the installation and has not been applied within this permit. The installation is an area source of HAPs and, therefore, does not meet the applicability requirements of §63.820(a)(1).

40 CFR Part 63, Subpart JJJJ – *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* is not applicable to the installation and has not been applied within this permit. The installation is an area source of HAPs and, therefore, does not meet the applicability requirements of §63.3290.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation and has not been applied within this permit. The installation does not strip paint using methylene chloride (75-09-2), refinish autobodies, or spray apply coatings; therefore, the installation does not meet the applicability requirements of §63.11170(a).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and

- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable as the installation does not have the potential to emit any pollutant in excess of the major source threshold.

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 ton per year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 3,015.42 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to the installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is applicable to the installation, but has not been applied within this permit. The installation has the potential to emit only 0.19 tons of PM per year (0.04 lb/hr) and is assumed to always be in compliance with this regulation while being properly maintained and operated.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit. The installation has the potential to emit only 0.19 tons of PM per year (0.04 lb/hr) and is assumed to always be in compliance with this regulation while being properly maintained and operated.

The determinations made within this permit are based upon the following installation-wide potential emission calculations:

Pollutant	Potential to Emit (tons per year) ¹
CO	2.11
CO _{2e}	3,015.42
NH ₃	0.08
NO _x	2.51
PM ₁₀	0.19
PM ₂₅	0.19
SO _x	0.01
VOC	161.72 ²
HAP	0.05
Hexane (110-54-3)	0.05

¹Potential emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- ◆ Potential emissions from EP1B, EP2B, and EP3B Flexopresses #1, #2, and #3 were given 84.49 percent control of VOC emissions due to CD1 Catalytic Oxidizer required by Permit Condition 001.
- ◆ Potential emissions from EP1B, EP2B, and EP3B Flexopresses #1, #2, and #3 are based upon the following:
 - Coating as applied is comprised of approximately 47 percent solvent, 46 percent ink, and seven percent extender.
 - The solvent has a maximum VOC content of 100 percent and no HAPs.
 - The ink has a maximum VOC content of 71 percent and no HAPs.
 - The extender has a maximum VOC content of 82 percent and no HAPs.
- ◆ The Parts Washers use waterbased solvents containing no VOCs.

²The installation is limited to 100 tons per year of VOC by Permit Condition PW001 in order to maintain synthetic minor source status and retain this Intermediate operating permit.

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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
 Environmental Engineer

CERTIFIED MAIL: 70093410000193527975
RETURN RECEIPT REQUESTED

Mr. Richard D. Heck
Schreiber Foods, Inc. - Capri I
912 East Nusbaum Place
Clinton, MO 64735

Re: Schreiber Foods, Inc. - Capri I, 083-0033
Permit Number: **OP2012-015**

Dear Mr. Heck:

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.

You may appeal this permit to the Administrative Hearing Commission, 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 Administrative Hearing Commission 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 Administrative Hearing Commission.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:ark

Enclosures

c: Kansas City Regional Office
PAMS File: 2011-03-027