

STATE OF MISSOURI



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: 102010 - 008

Project Number: 2010-02-004
Installation Number: 083-0046

Parent Company: Schreiber Foods, Inc.

Parent Company Address: P.O. Box 19010, Green Bay, WI 54307-9010

Installation Name: Schreiber Foods, Inc. - Capri II

Installation Address: 1801 N. Gerhart Dr., Clinton, MO 64735

Location Information: Henry County, S34, T42N, R26W

Application for Authority to Construct was made for:
Construction of a new flexographic printing press and regenerative thermal oxidizer to control emissions from the press. This review was conducted in accordance with Section (6), 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.

OCT 18 2010

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 these air contaminant sources. 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 these air contaminant sources.

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 sources, 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 Foods, Inc. - Capri II
Henry County, S34, T42N, R26W

1. Control Device Requirement-Thermal Oxidizer
 - A. Schreiber Foods, Inc. - Capri II shall control emissions from the new flexographic printing press (EU-8) using a thermal oxidizer as specified in the permit application.
 - B. The thermal oxidizer shall remove volatile organic compounds (VOC) from the exhaust gas with 98% efficiency.
 - C. The thermal oxidizer shall be operated and maintained in accordance with the manufacturer's specifications. The operating temperature of the thermal oxidizer system shall be maintained within 50 degrees of the tested temperature.
 - D. The thermal oxidizer shall be equipped with a monitoring device that continuously indicates and records the combustion temperature of the incinerator. The monitoring device shall have accuracy within ± 1 percent of the temperature being measured in Celsius degrees as specified by the manufacturer. These gauges or meters shall be located such that the Department of Natural Resources employees may easily observe them.
 - E. Schreiber Foods, Inc. - Capri II shall maintain an operating and maintenance log for the thermal oxidizer which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. Operational Requirement
Schreiber Foods, Inc. - Capri II shall keep the solvents in sealed containers whenever the materials are not in use. Schreiber Foods, Inc. - Capri II shall provide and maintain suitable, easily read, permanent markings on all solvent containers used with this equipment.

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SPECIAL CONDITIONS:

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

3. Initial Compliance Testing
 - A. Schreiber Foods, Inc. - Capri II shall demonstrate compliance with special condition 2.B through performance testing.
 - B. These tests shall be performed not later than 60 days after achieving the maximum production rate at which the affected facility will be operated or 180 days after initial startup, whichever date comes first.
 - C. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
 - D. Two copies of a written report of the performance test results shall be submitted to the Director within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
 - E. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations
4. Record Keeping and Reporting Requirements
 - A. Schreiber Foods, Inc. - Capri II shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used
 - B. Schreiber Foods, Inc. - Capri II 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.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2010-02-004
Installation ID Number: 083-0046
Permit Number:

Schreiber Foods, Inc. - Capri II
1801 N. Gerhart Dr.
Clinton, MO 64735

Complete: February 1, 2010

Parent Company:
Schreiber Foods, Inc.
P.O. Box 19010
Green Bay, WI 54307-9010

Henry County, S34, T42N, R26W

REVIEW SUMMARY

- Schreiber Foods, Inc. - Capri II has applied for authority to construct a new flexographic printing press and regenerative thermal oxidizer to control emissions from the press.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs are emitted as products of combustion and are below their applicable screening model action levels.
- None of the New Source Performance Standards (NSPS) apply to the installation. Specifically NSPS subpart QQ does not apply because the printing press is not a rotogravure printing unit.
- 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. Specifically MACT subpart KK does not apply because the installation is not a major source of HAPs.
- A regenerative thermal oxidizer is being used to control the VOC emissions from the equipment in this permit.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of VOC are above de minimis levels.
- This installation is located in Henry 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 for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- Emissions testing is required for the thermal oxidizer.
- An Intermediate Operating Permit application is required for this installation within 90 days of equipment startup or a Part 70 Operating Permit application is required for this installation within one year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Schreiber Foods, Inc. - Capri II is an existing minor source of VOC located in Clinton, Missouri. The installation operates two flexographic printing presses (EU-6 Flexopress #4 and EU-7 Flexopress #5) that are controlled by a catalytic oxidizer (CD-2) and a laminator.

Schreiber Foods operates three other plants in Clinton, Missouri. Two of the plants are cheese manufacturing plants, which manufacture different products and are separated by several miles. The other plant (Capri I) is a flexographic printing operation. This plant has historically been considered the same installation as Schreiber Foods, Inc. - Capri II. However, as part of this review, Schreiber Foods requested the Program re-evaluate the same installation determination. This determination is based on three criteria: the facilities' industrial grouping, control of the facilities, and whether the facilities are adjacent. The facilities share the same two digit Standard Industrial Classification (SIC) code, so they are in the same industrial grouping. The facilities are both owned and operated by Schreiber Foods, so they are under common control. However the facilities are not adjacent, because they are located over one mile apart. Facilities may be considered adjacent even if they are separated by a considerable distance if there is some sort of supportive relationship connecting the two facilities. In this case the two facilities do not support each other. Orders are sent to the plants based on product specifications, the installations maintain separate inventories of raw materials, and the installations' workforces are separate except for a few upper level managers. If the two installations ever become interdependent by sharing employees, materials, etc., this determination will become invalid and Schreiber Foods, Inc. shall submit a permit amendment to account for the change.

Schreiber Foods, Inc. was issued an intermediate operating permit (OP2009-040) for the two installations. Upon issuance of this permit, this operating permit will need to be amended to reflect that the two installations are separate, To that end Schreiber Foods,

Inc. shall submit separate operating permit applications for both the Capri I and Capri II installations.

The following construction permits have been issued to Schreiber Foods, Inc. - Capri II from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
072003-019	Installation of two new flexographic printing presses with a catalytic oxidizer.

PROJECT DESCRIPTION

Schreiber Foods, Inc. - Capri II has applied for authority to construct a new flexographic printing press (EU-8) and a regenerative thermal oxidizer (CD-3) to control emissions from the press. The press is capable of processing 0.36 tons of ink per hour. The press is enclosed with a cabinet and will not operate unless the cabinet is closed. This cabinet ensures that the thermal oxidizer captures approximately 85 percent of the VOC emitted during printing. The thermal oxidizer is rated at 2.89 million British thermal units per hour.

EMISSIONS/CONTROLS EVALUATION

Emissions from the printing were calculated using a mass balance approach and applying an 85 percent capture efficiency and a 98 percent control efficiency for the thermal oxidizer. Emissions from natural gas combustion in the thermal oxidizer were calculated using emission factors from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, section 1.4, "Natural Gas Combustion," July 1998. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2009 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	0.11	0.02	0.10	N/A
SO _x	40.0	0.01	0.00	0.01	N/A
NO _x	40.0	1.4	0.27	1.27	N/A
VOC	40.0	175.75	44.59	60.38	N/A
CO	100.0	1.2	0.23	1.06	N/A
Total HAPs	25.0	N/A	N/D	0.02	N/A

N/A = Not Applicable; N/D = Not Determined

Existing Potential Emissions were taken from permit 072003-019

Existing Actual Emissions were taken from EU-6, EU-7, and CD-02 in the 2009 EIQ

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are above de minimis levels.

APPLICABLE REQUIREMENTS

Schreiber Foods, Inc. - Capri II 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 June 1 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

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Michael Mittermeyer
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

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

Mr. Johnny Crawford
Regulatory Technician
Schreiber Foods, Inc. - Capri II
912 Nusbaum Place
Clinton, MO 64735

RE: New Source Review Permit - Project Number: 2010-02-004

Dear Mr. Crawford:

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 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 Michael Mittermeyer, with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by phone at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:mmm

Enclosures

c: Kansas City Regional Office
PAMS File: 2010-02-004

Permit Number: