

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Kraft Foods Global, Inc.
Attn: Joe Matesic
1701 West Bradley Avenue
Champaign, Illinois 61821

Application No.: 73020205

I.D. No.: 019802AAF

Applicant's Designation:

Date Received: October 6, 2009

Subject: Food Product Manufacturing Plant

Date Issued: December 18, 2009

Expiration Date: August 6, 2012

Location: 1701 West Bradley Avenue, Champaign, Champaign County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three natural gas/No. 6 oil fired boilers, four flour handling systems controlled by dust collectors and filters, starch receiving system controlled by a cyclone and baghouse, one alcohol tank (20,000 gallons); three starch slurry tanks, and relish kettles controlled by a rotoclone and wet fume scrubber; two vinegar acetators with condensers controlled by a scrubber, cheese cookers controlled by rotoclone, two (2) brine tanks controlled by dust collection system, spice room controlled by a dust collector, DCO dust collection system with baghouse, three auto salt filter receivers controlled by three filters, and two powder cheese conveyor lines each controlled by baghouse pursuant to the above referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for NO_x, PM₁₀, and SO₂). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.

- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.206, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hour of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu).
- d. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- e. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
3. Pursuant to 35 IAC 214,122(b)(1), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 1.55 kg of sulfur dioxide per MW-hour of actual heat input when residential fuel oil is burned (0.8 lbs/mmBtu).
4. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.
5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In

cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- 6a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dust collection systems associated with the brine tanks such that the dust collection systems are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- b. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- c. Natural gas and fuel oil No. 6 shall be the only fuels used in the fuel combustion emission sources. Use of any other fuel other than natural gas or fuel oil No. 6 requires a permit change.
- d. The Permittee shall not utilize residual fuel oil (Grades No. 4, 5 and 6) at this source with a sulfur content greater than that given by the formula:

$$\text{Maximum weight percent sulfur} = (0.00005) \times (\text{Gross heating value of oil, Btu/lbs})$$
- e. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources.
- f. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 7a. Emissions and operation of all fuel combustion emissions sources shall not exceed the following limits:
 - i. Natural gas operation and emissions:

<u>Material</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
				<u>Factor</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
				<u>(Lbs/mmscf)</u>		
Natural Gas	125	1,234	NO _x	100	6.30	61.7
			CO	84	5.3	51.9
			PM	7.6	0.5	4.7
			SO ₂	0.6	0.1	0.4
			VOM	5.5	0.4	3.4

These limits are based on the maximum fuel usage, and Standard AP-42 emission factors, tables 1.4-1 and 1.4-2.

- ii. Residual fuel oil operation and emissions:

<u>Material</u>	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
				<u>Factor</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
				<u>(Lbs/10³ Gal)</u>		
Fuel Oil No.6	275,000	1,210,191	NO _x	55	7.6	33.3
			CO	5	0.7	3.1
			PM	12.41	1.71	7.6
			SO ₂	47.1	6.5	28.5
			VOM	1.04	0.2	0.63

These limits are based on the maximum boiler operation 8,760 hours per year each boiler, and Standard AP-42 emission factors, Table 1.3-1.

- b. Emissions of particulate matter and operation of the listed equipment shall not exceed the following limits:

<u>Equipment</u>	<u>Material Throughput</u>		<u>PM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Starch Receiving System	6,570	65,700	0.20	2.00
Brine Tank #1	8,760	87,600	0.88	8.80
Flour Handling System:				
System I	26,280	262,800	0.53	5.26
System II	26,280	262,800	2.63	26.30
System III	6,215	62,152	0.44	4.41
System IV	2,628	26,280	0.11	1.10
		Totals	3.91	39.09

These limits define the potential emissions of PM and are based on maximum capacity, cyclone capture efficiency of 98 percent, filter efficiency of 99.9 percent, and emission factors as established by the company.

- c. Emissions of volatile organic material and operation of the vinegar acetators shall not exceed the following limits:

<u>Alcohol Usage</u>		<u>VOM Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
200	2,000	1.3	12.5

These limits define the potential emissions of VOM and are based on maximum capacity and emission factors as established by the company.

- d. This permit is issued based on negligible emissions of particulate matter from the DCO collection system, starch slurry tanks, relish kettles, wet fume scrubber, cheese cookers and spice room. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.

- e. This permit is issued based on negligible emissions of particulate matter from the three auto salt filter receivers controlled by three filters. For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.05 lbs/hour and 0.22 tons/year.
 - f. This permit is issued based on negligible emissions of particulate matter from each powder cheese conveying line. For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
 - g. This permit is issued based on negligible emissions of volatile organic material from the alcohol storage tank, and wet fume scrubber. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
 - h. This permit is issued based on negligible emissions of particulate matter from Brine Tank #2. For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
 - i. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).
8. This permit is issued based on the potential to emit of (PTE) for Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit.
- 9a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of

air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 10 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 10. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 11. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an unaffected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR

63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

12. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 13a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Records addressing use of good operating practices for the pollution control equipment covered under this permit:
 - A. Records for periodic inspection of the pollution control equipment covered under this permit with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Natural gas usage (therms or mmscf/month and therms or mmscf/year);
 - iii. Fuel oil usage (gallons/month and gallons/year);
 - iv. Sulfur content of diesel fuel (percent by weight);
 - v. Raw material throughput for the Starch Receiving System, Brine Tank #1, and the Flour Handling System (tons/month and tons/year);
 - vi. Processed cheese throughput of the dense phase ingredient transfer system (tons/month and tons/year);
 - vii. Amount of alcohol used in the vinegar acetators (tons/month and tons/year); and
 - viii. Monthly and annual CO, NO_x, PM, SO₂, and VOM emissions from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

14. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 15a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, and a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce the emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

It should be noted that this permit has been revised to incorporate the operation of the equipment described in Construction Permit 09100007.

If you have any questions on this permit, please call George Kennedy at 217/782-2113.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:GMK:psj

cc: IEPA, FOS Region 3
Lotus Notes

Attachment A

This attachment provides a summary of the maximum emission for the Food Product Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (i.e., 100 tons/year for nitrogen oxides (NO_x), 100 tons/year for carbon monoxide (CO), 100 tons/year for particulate matter (PM), 100 tons/year for sulfur dioxide (SO₂), and 100 tons/year for volatile organic material (VOM)) at which this facility would be considered a major source for purposes of the Clean Air Act Permit Program.

	E M I S S I O N S				
	NO _x	CO	PM	SO ₂	VOM
	<u>(T/Yr)</u>	<u>(T/Yr)</u>	<u>(T/Yr)</u>	<u>(T/Yr)</u>	<u>(T/Yr)</u>
<u>Combustion:</u>					
Natural Gas	61.7	51.9	4.70	0.4	3.40
Fuel Oil No. 6	33.3	3.1	7.60	28.5	0.63
Starch Receiving System			2.00		
Brine Tanks #1			8.80		
Flour Handling System					
System I			5.26		
System II			26.30		
System III			4.41		
System IV			1.10		
Vinegar Acetators					12.50
DCO Collection System			0.44		
Starch Slurry Tanks			0.44		
Relish Kettles			0.44		
Wet Fume Scrubber			0.44		
Cheese Cookers			0.44		
Spice Room			0.44		
3 Auto Salt Filter Receivers			0.66		
2 Powder Cheese Conveying Lines			0.88		
Alcohol Storage Tank					0.44
Wet Fume Scrubber					0.44
Brine Tank #2			<u>0.44</u>		
Totals:	<u>95.0</u>	<u>55.0</u>	<u>64.79</u>	<u>28.9</u>	<u>17.41</u>

GMK:psj