

217/782-2113

"REVISED"

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE - REVISED

PERMITTEE

Kraft Foods, Inc.  
Attn: Mark Elbon  
1701 West Bradley Avenue  
Champaign, Illinois 61821

Application No.: 73020205

I.D. No.: 019802AAF

Applicant's Designation:

Date Received: September 11, 2000

Subject: Food Product Manufacturing Plant

Date Issued: November 22, 2000

Expiration Date: December 18, 2001

Location: 1701 West Bradley Avenue, Champaign

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/oil fired boilers, flour handling system controlled by dust collectors and filters, starch receiving system, milk reconstituting, two fuel oil tanks, one alcohol tank, three starch slurry tanks, relish kettles, base cookers, fume scrubber, diesel fuel tank, two vinegar acetators with condensers controlled by a scrubber, cheese cookers, brine tank, cheese phosphate process, spice room controlled by a dust collector, a DCO dust collection system with baghouse, pasta packaging glue rotoclone, cyclones, baghouses, and rotoclones 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 SO<sub>2</sub> and NO<sub>x</sub>). 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 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. The two fuel oil storage tanks are subject to the New Source Performance Standard (NSPS) for storage vessels, 40 CFR 60, Subpart Kb. The Illinois EPA is administrating NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The Permittee shall fulfill the monitoring or operations requirements of the New Source Performance Standard, 40 CFR 60.116b (b) for the two fuel oil storage tanks. That is, records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel, shall be maintained and readily accessible for the life of the source.

- 3a. Emissions and operation of all fuel combustion emissions sources shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Pollutant</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions (T/Mo)</u>	<u>(T/Yr)</u>
Natural Gas	123.4	1,234	NO <sub>x</sub>	100	6.17	61.70
			CO	84	5.2	51.83
			TSP	7.6	0.47	4.69
			SO <sub>2</sub>	0.6	0.04	0.37
			VOM	5.5	0.34	3.39

<u>Material</u>	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Pollutant</u>	<u>Emission Factor (Lb/10<sup>3</sup> Gal)</u>	<u>Emissions (T/Mo)</u>	<u>(T/Yr)</u>
Fuel Oil #6	121,019	1,210,191	NO <sub>x</sub>	55	3.33	33.3
			CO	5	0.30	3.03
			TSP	12.41	0.75	7.51
			SO <sub>2</sub>	157	9.5	95.0
			VOM	1.04	0.06	0.63

These limits define the potential emissions of NO<sub>x</sub>, CO, TSP, SO<sub>2</sub>, and VOM and are based on maximum fuel usage and standard emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas and fuel oil #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 #6 requires a permit change.
4. 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>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Starch Receiving System	6,570	65,700	0.2	2.0
Brine Tank	8,760	87,600	0.88	8.8
Flour Handling System:				
System I	26,280	262,800	0.53	5.26
System II	26,280	262,800	2.63	26.3
System III	6,215	62,152	0.44	4.41
System IV	2,628	26,280	0.11	1.10
		Total	4.79	47.9

These limits define the potential emissions of PM and are based on maximum capacity, cyclone capture efficiency of 98%, filter efficiency of 99.9%, and emission factors as established by the company. Compliance with annual limits shall be determined from a running total of 12 months of data.

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

Alcohol Usage		VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
141	1,410	0.88	8.8

These limits define the potential emissions of VOM and are based on maximum capacity and emission factors as established by the company. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. This permit is issued based on negligible emissions of particulate matter from the DCO collection system, milk reconstituting, starch slurry tanks, relish kettles, base cookers, fume scrubber and spice room. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
7. This permit is issued based on negligible emissions of volatile organic material from the two fuel oil storage tanks, diesel fuel storage tank, alcohol storage tank and the pasta packaging glue rotoclone. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
8. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
- 9a. At the above location, the Permittee shall not keep, store, or utilize a residual fuel oil (Grades No. 4, 5, and 6) with a sulfur content greater than that given by the formula:
- b. Maximum wt. percent sulfur = (0.00005) X (Gross heating value of the oil in Btu/lb).
- c. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources without written approval from the Illinois EPA.
- d. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 10a. The Permittee shall maintain monthly records of the following items:
- i. Natural gas usage (therms or mmscf/month and therms or mmscf/year);

- ii. Fuel oil usage (gallons/month and gallons/year);
  - iii. Emissions of NO<sub>x</sub> and SO<sub>2</sub> on a monthly and 12 month running total basis, in ton/mo and ton/yr;
  - iv. Raw material throughput for the sources listed in Condition 4 (tons/month and tons/year);
  - v. Amount of alcohol used in the vinegar acetators (tons/month and tons/year); and
  - vi. Calculations of PM emissions from the sources listed in Condition 4 (tons/month and tons/year).
11. These records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be available for inspection and copying by the Illinois EPA and USEPA upon request. Any record retained in an electronic format (e.g., computer) 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 request for records during the course of a source inspection.
12. If there is an exceedance of 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. 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 exceedances or violation and efforts to reduce the emissions and future occurrences.
13. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulation promulgated therein.
14. In the event that the operation of this facility results in an odor nuisance or any other nuisance due to process operating conditions, raw materials usage or any other cause, the Permittee shall take all appropriate and necessary actions, including but not limited to, changes in process conditions, raw materials, or installation of emission controls, in order to eliminate the nuisance.
15. 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 (that is, looking at the sky directly overhead) from a point beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.

16. All reports, notifications, etc., required by this permit shall be sent to:

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

17. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. Natural gas usage (therms/month and therms/year)
  - b. Fuel oil usage (gallons/month and gallons/year)
  - c. Raw material throughput for the sources listed in Condition 4 (tons/month and tons/year).

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

Please note that this permit has been revised to incorporate Construction Permit #00090069 and to include the replacement flour filter receiver and blower.

It should be noted that this permit has been revised to change the emission limits for the fuel combustion sources and to add the throughput limit to the PM and VOM emission sources.

If you have any questions on this permit, please call Tara T. Nguyen-Ede at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: IEPA, FOS Region 3  
IEPA, Compliance Section  
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 at which this facility would be considered a major source for purposes of the Clean Air Act Permit Program.

- 1a. Emissions and operation of all fuel combustion emissions sources shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Pollutant</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions (T/Mo)</u>	<u>(T/Yr)</u>
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