

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

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

<u>Application No.:</u> 73020205	<u>I.D. No.:</u> 019802AAF
<u>Applicant's Designation:</u>	<u>Date Received:</u> June 12, 2001
<u>Subject:</u> Food Product Manufacturing Plant	
<u>Date Issued:</u> October 11, 2001	<u>Expiration Date:</u> October 11, 2006
<u>Location:</u> 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/#6 oil fired boilers, four flour handling systems controlled by dust collectors and filters, starch receiving system controlled by a cyclone and baghouse, milk reconstituting controlled by rotoclone, one alcohol tank (20,000 gallons), three starch slurry tanks, relish kettles, and base cookers controlled by a rotoclone and fume scrubber, two vinegar acetators with condensers controlled by a scrubber, cheese cookers controlled by rotoclone, brine tank controlled by dust collection system, spice room controlled by a dust collector, DCO dust collection system with baghouse, and pasta packaging glue operation controlled by rotoclone 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 SO₂ and NO_x). 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. 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	125	1,234	NO _x	100	6.30	61.7
			CO	84	5.3	51.9
			TSP	7.6	0.5	4.7
			SO ₂	0.6	0.1	0.4
			VOM	5.5	0.4	3.4

<u>Material</u>	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Pollutant</u>	<u>Emission Factor (Lb/10³ Gal)</u>	<u>Emissions (T/Mo)</u>	<u>(T/Yr)</u>
Fuel Oil #6	275,000	1,210,191	NO _x	55	7.6	33.3
			CO	5	0.7	3.1
			TSP	12.41	1.71	7.6
			SO ₂	157	21.6	95.0
			VOM	1.04	0.2	0.63

These limits define the potential emissions of NO_x, CO, TSP, SO₂, 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.
3. 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.

4. 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.

5. 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, cheese cookers 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.
6. This permit is issued based on negligible emissions of volatile organic material from the alcohol storage tank and the pasta packaging glue. 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. 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.
- 8a. 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_x and SO₂ 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 3 (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 3 (tons/month and tons/year).

9. 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.
10. 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.
11. 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.
12. 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.
13. 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.
14. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system 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

15. 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 3 (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.

It should be noted that the diesel fuel storage tank and two fuel oil storage tanks are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(n).

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:

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

<u>Equipment</u>	<u>Material Throughput (Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>PM Emissions (Ton/Mo)</u>	<u>(Ton/Yr)</u>
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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.

4. 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, cheese cookers 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.
5. This permit is issued based on negligible emissions of volatile organic material from the alcohol storage tank and the pasta packaging glue operation. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
6. 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.

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