

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

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: May 18, 2006

Subject: Food Product Manufacturing Plant

Date Issued: August 6, 2007

Expiration Date: August 6, 2012

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/No. 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 wet 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, pasta packaging glue operation controlled by rotoclone, 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 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. 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 the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.

- b. 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).
 - c. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
 - d. 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 subsection (c) of 35 Ill. Adm. Code 212.321.
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).
- 4a. 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.
- 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.
- 5a. 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.
- b. 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:

$$\text{Maximum weight percent sulfur} = (0.00005) \times (\text{Gross heating value of oil, Btu/lbs})$$

- c. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources.
- e. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 6a. 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 Factor (Lbs/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
			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 Factor (Lbs/10³ Gal)</u>	<u>Emissions (T/Mo)</u>	<u>(T/Yr)</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 (Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>PM Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Starch Receiving System	6,570	65,700	0.20	2.00
Brine Tank	8,760	87,600	0.88	8.80
Flour Handling System: System I	26,280	262,800	0.53	5.26

<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>
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	4.79	47.89

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, milk reconstituting, starch slurry tanks, relish kettles, base cookers, 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, the pasta packaging glue, 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.
7. 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 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:
 - i. For both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301, pursuant to 35 Ill. Adm. Code 212.107.
 - ii. Except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 Ill. Adm. Code 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged, pursuant to 35 Ill. Adm. Code 212.109.
 - iii. Measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E, pursuant to 35 Ill. Adm. Code 212.110(a).
 - iv. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4, pursuant to 35 Ill. Adm. Code 212.110(b).
 - v. 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, pursuant to 35 Ill. Adm. Code 212.110(c).

- b. Testing required by Condition 9(a) shall be performed by a qualified independent testing service.
- 10a. 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 affected 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.
- b. 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.
 - c. 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 sources listed in Condition 3 (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).
11. These 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 available for inspection and copying by the Illinois EPA or 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 or USEPA request for records during the course of a source inspection.
12. If there is an exceedance of or 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/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.
13. 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.

14. 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 no longer include operation of one powder cheese conveyor line and the dense phase ingredient transfer system.

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

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

ECB:GMK:jws

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.

Source	NO _x (T/Yr)	E M I S S I O N S CO (T/Yr)	PM (T/Yr)	SO ₂ (T/Yr)	VOM (T/Yr)
<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	95.0	0.63
Starch Receiving System			2.00		
Brine Tank			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		
Milk Reconstituting			0.44		
Starch Slurry Tanks			0.44		
Relish Kettles			0.44		
Base Cookers			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
Pasta Packaging Glue					0.44
Wet Fume Scrubber					0.44
Totals:	95.0	55.0	64.25	95.4	17.85

GMK:jws