

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: November 10, 1999

Subject: Food Product Manufacturing Plant

Date Issued: December 3, 1999

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 6 bin vent filters and a flour runaround dust collection system, 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.

3. Total combined operations and emissions from all fuel combustion units shall not exceed the following limits:

a.	Natural Gas Usage		Fuel Oil Usage		Nitrogen Oxides		Sulfur Dioxide	
	<u>(Therms/Mo)</u>	<u>(Therms/Yr)</u>	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
	734,524	8,814,286	372,000	1,210,191	10.2	95.0	29.2	95.0

These limits are based on i) natural gas standard emission factors of 140 lb NO<sub>x</sub>/10<sup>6</sup> ft<sup>3</sup> and 0.6 lb SO<sub>2</sub>/10<sup>6</sup> ft<sup>3</sup> natural gas burned, and a conversion factor of 1 therm/100 ft<sup>3</sup>; ii) fuel oil standard emission factors of 55 lb NO<sub>x</sub>/10<sup>3</sup> gal and 157 lb SO<sub>2</sub>/10<sup>3</sup> gal # 6 fuel oil burned.

b. Compliance with annual limits for the fuel combustion units shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (i.e., a 12 month running total).

c. Monthly calculations shall be made of the total emissions of NO<sub>x</sub> and SO<sub>2</sub>.

4a. 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.

5a. The Permittee shall maintain records of the following items:

i. Natural gas usage (therms/month and therms/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; and
  - iv. Weight percent sulfur in fuel oil.
- b. 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.
6. 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.
- 7a. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>E M I S S I O N S</u>			
	<u>Particulate Matter</u>		<u>VOM</u>	
	<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
Flour Handling System	4.6	20.1	---	---
Starch Receiving System	0.5	2.0	---	---
Milk Reconstituting	0.1	0.5	---	---
Brine Tank	2.0	8.8	---	---
Vinegar Acetators	---	----	2.0	8.8

- These limits are based on standard emission factors and the information provided in the permit application. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- b. The Permittee shall keep records for the emission sources listed in Condition 7a. These records shall include, but not limited to, monthly records of raw material throughputs.
8. This permit is issued based on negligible emissions of particulate matter from the DCO collection system, the spice room dust collector, and the flour runaround dust collection system. For this purpose, emissions shall not exceed nominal rates of 0.1 lb/hour and 0.44 tons/year.

9. 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.
10. 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.
11. 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.
12. 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
13. 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. A summary of records required by Condition 6.

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 #99110034 and to include the flour runaround dust collection system.

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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  
PCF #10

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 from all fuel combustion units, combusting natural gas:

<u>Throughput</u> (10 <sup>6</sup> ft <sup>3</sup> /Yr)	<u>Emission Unit</u>	<u>Pollutant</u>	<u>Emission Rate</u> (Lb/10 <sup>6</sup> ft <sup>3</sup> )	<u>Emissions</u> (Ton/Yr)
881 (Natural Gas)	Boilers and Air Compressor	NO <sub>x</sub>	140	61.7
		CO	35	15.4
		PM	6.2	2.7
		VOM	2.78	1.2

This table defines the potential emissions of three boilers and is based on the actual emissions determined from hourly unit capacity, the combustion of natural gas, and standard emission factors.

b. Emissions from three main boilers, combusting residual oil:

<u>Throughput</u> (Gal/Yr)	<u>Emission Unit</u>	<u>Pollutant</u>	<u>Emission Rate</u> (Lb/10 <sup>3</sup> Gal)	<u>Emissions</u> (Ton/Yr)
1,210,191 (Residual Fuel Oil)	Boilers	SO <sub>2</sub>	157	95.0
		NO <sub>x</sub>	55	33.3
		PM	12.41	7.5
		CO	5	3.0
	Two Residual Fuel Oil Storage Tanks	VOM	0.1 lb/hr	0.44 ton/yr

This table defines the potential emissions of three boilers and is based on the actual emissions determined from hourly unit capacity, the combustion of residual fuel oil, and standard emission factors.

c. Particulate matter and volatile organic material emissions:

<u>Emission Unit</u>	<u>Pollutant</u>	<u>Emissions</u> (Ton/Yr)
Flour Handling System	PM	20.1
Starch Receiving System	PM	2.0
Milk Reconstituting	PM	0.5
Brine Tank	PM	8.8
Vinegar Acetators	VOM	8.8
DCO Collection System	PM	0.22
Spice Room Baghouse	PM	0.22

d. Emissions from negligible sources:

<u>Emission Unit</u>	<u>Pollutant</u>	<u>Emissions</u>
Starch Slurry Tanks	PM	0.44 ton/yr
Relish Kettles	PM	0.44 ton/yr
Base Cookers	PM	0.44 ton/yr
Fume Scrubber	PM	0.44 ton/yr
Spice Room	PM	0.44 ton/yr
Two #6 Fuel Oil Storage Tanks	VOM	0.44 ton/yr
Alcohol Storage Tank	VOM	0.44 ton/yr
Diesel Fuel Storage Tank	VOM	0.44 ton/yr
Pasta Packaging Glue Rotoclone	VOM	0.44 ton/yr

This table defines the potential emissions of the above sources and is based on the actual emissions determined from hourly unit capacity.

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