

AIR EMISSION PERMIT NO. 09900002-009

IS ISSUED TO

HORMEL FOODS CORPORATION

and

Quality Pork Processors (co-operator)

Hormel Foods Corporation
500 14th Avenue Northeast
Austin, Mower County, MN 55912

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

| Permit Type | Application Date | Issuance Date | Action Number |
|---|-------------------------|---------------|---------------|
| Total Facility Operating Permit Reissuance | 02/06/2004 & 08/22/2005 | 11/02/2005 | 008 |
| Major Amendment | 01/17/2006 | See below | 009 |

This permit authorizes the Permittee to operate and construct the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Part 70/Limits to Avoid New Source Review

Authorization to Construct and Operate (40 CFR § 52.21) Issuance Date: June 5, 2006

Authorization to Construct and Operate (40 CFR § 52.21) Effective Date: June 5, 2006

Final Permit Issuance Date: June 21, 2006

Expiration: 11/02/2010

Title I Conditions do not expire.

Richard J. Sandberg, Manager
Air Quality Permits Section
Industrial Division

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

| | |
|--------------------|----------------|
| Metro Area | (651) 296-6300 |
| Outside Metro Area | 1-800-657-3864 |
| TTY | (651) 282-5332 |

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

The Hormel Foods Corporation operates a meat processing plant in Austin, Minnesota. At the facility, Quality Pork Processor (QPP) processes hogs, and the Permittee manufactures the hogs into ham, bacon, dry sausage, fresh sausage, SPAM[®], and other meat products. Byproducts consist of blood, cracklings, bone meal, and choice white grease (a component of a broader category of substances known as refined animal fats. QPP is a co-permittee however Hormel Foods owns all equipment and operates the majority of it; QPP only operates some of the emissions equipment (insignificant combustion sources) in the processing area.

There are many emission sources at the facility, however most of them qualify as insignificant activities under Minn. R. 7007.1300, subparts 3 and 4. Most of these insignificant activities are natural gas-fired combustion sources such as makeup air heaters, space heaters, and process ovens. Some of these insignificant activities are included in the following facility discussion.

Seven boilers combusting mainly natural gas provide process steam. In addition, twelve natural gas-fired process ovens produce meat products using natural or liquid smoke. Pre-cooked process lines produce pre-cooked bacon and bacon bits.

Rendering emissions are treated in a venturi scrubber and packed tower scrubbers before discharge to the atmosphere. Emissions from a bone meal dryer and a blood dryer are also treated by a venturi scrubber and packed tower scrubbers before discharge to the atmosphere.

ACTION 009

This amendment authorizes construction and operation of seven identical 2000 kW diesel electric generators. The engines will be Caterpillar model 3516 units and will be operated as peaking and emergency power units. The generators will be able to provide emergency backup power to the Austin Municipal Utilities Power Plants and the Austin Medical Center. The Permittee will not charge for this power and therefore the units are not subject to the acid rain program. Each unit is anticipated to operate 300 hours per year. Also, performance testing requirements in GP 003 and GP 012 were revised based on recent testing of these sources.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility

| What to do | Why to do it |
|---|--|
| Ambient Air Quality Standards: The Permittee shall comply with and upon written request demonstrate compliance with National Primary and Secondary Ambient Air Quality Standards in Title 40 CFR part 50, and the Minnesota Ambient Air Quality Standards at Minn. R. 7009.0010 to 7009.0080. | 40 CFR part 50; Minn. Stat. Sec. 116.07, subds. 4a and 9; Minn. R. 7007.0100, subps. 7A, 7L and 7M; Minn. R. 7007.0800, subps. 1, 2, and 4; Minn. R. 7009.0010-7009.0080 |
| Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and/or B. | Minn. R. ch. 7017 |
| Emission limits and emission factors determined as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit. | Minn. R. 7007.0800, subp. 2 and Minn. R. 7017.2025 |
| Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018. | Minn. R. 7017.2030, subp. 1-4, Minn. R. 7017.2035, subp. 1-2, and Minn. R. 7017.2018 |
| Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit). | Minn. R. 7007.0800, subp. 4(D) |
| Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system. | Minn. R. 7007.0800, subp. 4(D) |
| Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation. | Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J) |
| Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted. | Minn. R. 7011.0020 |
| Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over. | Minn. R. 7019.1000, subp. 3 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

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|---|--|
| Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over. | Minn. R. 7019.1000, subp. 2 |
| Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment. | Minn. R. 7019.1000, subp. 1 |
| Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation. | Minn. R. 7019.1000, subp. 1 |
| Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate. | Minn. R. 7019.1000, subp. 4 |
| Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A. | Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J) |
| Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150. | Minn. R. 7011.0150 |
| Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed. | Minn. R. 7007.1150 through Minn. R. 7007.1500 |
| Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H). | Minn. R. 7007.1400, subp. 1(H) |
| Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes. | Minn. R. 7007.0800, subp. 5(B) |
| Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A). | Minn. R. 7007.0800, subp. 5(C) |
| Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable. | Minn. R. 7030.0010 - 7030.0080 |
| The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16. | Minn. R. 7007.0800, subp. 16 |
| Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location. | Minn. R. 7007.0800, subp. 9(A) |
| Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). The report shall be submitted on a form approved by the Commissioner. | Minn. R. 7019.3000 through Minn. R. 7019.3010 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Hormel Foods Corp/QPP - Austin
Permit Number: 09900002 - 009

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|---|---|
| Emission Fees: due 60 days after receipt of an MPCA bill. | Minn. R. 7002.0005 through Minn. R. 7002.0095 |
|---|---|

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: GP 001 SO2 and NOx Limits

Associated Items: EU 001 Boiler #1

EU 002 Boiler #2

EU 003 Boiler #3

EU 004 Boiler #4

EU 005 Boiler #5

EU 044 Boiler #6

EU 045 Boiler #7

EU 051 Emergency RICE(s)

EU 080 Generator #1

EU 081 Generator #2

EU 082 Generator #3

EU 083 Generator #4

EU 084 Generator #5

EU 085 Generator #6

EU 086 Generator #7

| What to do | Why to do it |
|--|--|
| GP 001 ASSOCIATED ITEMS GP 001 is composed of GP 011 and GP 012 emission units, and EU 051. GP 011 is composed of EU 080 through EU 086. GP 012 is composed of EU 001 - EU 005, EU 044, and EU 045. | hdr |
| EMISSION LIMITS | hdr |
| Nitrogen Oxides: less than or equal to 180 tons/year using 12-month Rolling Sum total for GP 001. | Title I Condition: To limit potential NOx emissions to less than major source levels defined by 40 CFR Section 52.21; Minn. R. 7007.3000 |
| Sulfur Dioxide: less than or equal to 235 tons/year using 12-month Rolling Sum total for GP 001 combustion of diesel fuel, fuel oil, waste oil, and refined animal fats. This does not include any SO2 emissions from distillate oil or diesel fuel combustion in EU 051. | Title I Condition: To limit potential SO2 emissions to less than major source levels defined by 40 CFR Section 52.21; Minn. R. 7007.3000 |
| RECORDKEEPING | hdr |
| Sulfur Dioxide Emissions Monitoring and Recordkeeping: By the 15th day of each month the Permittee shall: 1) Calculate and record GP 001 SO2 emissions during the previous calendar month using the following equation: $SO_2 = GP\ 011 + GP\ 012$ where: $SO_2 = GP\ 001\ \text{calendar month SO}_2\ \text{emissions, in tons}$ $GP\ 011 = GP\ 011\ \text{calendar month SO}_2\ \text{emissions, in tons, determined under GP 011}$ $GP\ 012 = GP\ 012\ \text{calendar month SO}_2\ \text{emissions, in tons, determined under GP 012}$ (continued) | Minn. R. 7007.0800, subp. 4 and 5 |
| (continued from above) 2) Calculate and record the 12-month rolling sum GP 001 SO2 emissions by summing the monthly GP 001 SO2 emissions determined with the above equation, for the previous 12 months. | Minn. R. 7007.0800, subp. 4 and 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-5**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

| | |
|--|-----------------------------------|
| <p>Nitrogen Oxides Emissions Monitoring and Recordkeeping: By the 15th day of each month the Permittee shall:</p> <p>1) Calculate and record GP 001 NOx emissions during the previous calendar month using the following equation:</p> $\text{NOx} = \text{GP 011} + \text{GP 012} + (\text{EU 051}/2000)$ <p>where:</p> <p>NOx = GP 001 calendar month NOx emissions, in tons GP 011 = GP 011 calendar month NOx emissions, in tons, determined under GP 011 GP 012 = GP 012 calendar month NOx emissions, in tons, determined under GP 012 EU 051 = EU 051 calendar month NOx emissions, in pounds, determined under EU 051</p> <p>(continued)</p> | Minn. R. 7007.0800, subp. 4 and 5 |
| <p>(continued from above)</p> <p>2) Calculate and record the 12-month rolling sum GP 001 NOx emissions by summing the monthly GP 001 NOx emissions determined with the above equation, for the previous 12 months.</p> | Minn. R. 7007.0800, subp. 4 and 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: GP 003 Natural Smoke Process

Associated Items:

- EU 006 Smoked Meat Oven #6 with recirculated natural wood smoke
- EU 007 Smoked Meat Oven #7 with recirculated natural wood smoke
- EU 008 Smoked Meat Oven #8 with recirculated natural wood smoke
- EU 009 Smoked Meat Oven #9 with recirculated natural wood smoke
- EU 010 Smoked Meat Oven #10 with recirculated natural wood smoke
- EU 011 Smoked Meat Oven #11 with recirculated natural wood smoke
- EU 031 Natural Smoke Generator
- EU 032 Natural Smoke Generator
- SV 003 Natural Smoke Meat Oven (EU 006)
- SV 005 Natural Smoke Meat Oven (EU 007)
- SV 007 Natural Smoke Meat Oven (EU 008)
- SV 009 Natural Smoke Meat Oven (EU 009)
- SV 011 Natural Smoke Meat Oven (EU 010)
- SV 012 Natural Smoke Meat Oven (EU 011)

| What to do | Why to do it |
|--|--------------------------------|
| EMISSION LIMITS | hdr |
| Total Particulate Matter: less than 0.30 grains/dry standard cubic foot unless required to reduce emissions to meet the less stringent limit of either 7011.0730 or 7011.0735 (table 1 and 2, respectively). This limit applies individually to each stack/vent. | Minn. R. 7011.0715, subp. 1(A) |
| Opacity: less than or equal to 20 percent . This limit applies individually to each stack/vent. | Minn. R. 7011.0715, subp. 1(B) |
| PERFORMANCE TEST REQUIREMENTS | hdr |
| Performance Test - Retest: due 30 days after Permit Issuance to measure opacity from one of the GP 003 emission units while using natural smoke from EU 031 or EU 032. This requirement may be completed prior to issuance of this permit (No. 09900002-009). | Minn. R. 7017.2020, subp. 1 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-7**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: GP 005 Precook Processes

Associated Items: CE 006 Mist Eliminator - High Velocity, i.e., V>250 Ft/Min
 CE 007 Mist Eliminator - High Velocity, i.e., V>250 Ft/Min
 CE 025 Mist Eliminator - High Velocity, i.e., V>250 Ft/Min
 EU 018 Precooked Bacon, South
 EU 019 Precooked Bacon, North
 EU 020 Precooked Bacon, East
 EU 021 Precooked Bacon, West
 EU 029 Bacon Bits Precooked Line
 SV 019 Precooked Bacon Stack (EU 018 & EU 019/CE 006)
 SV 020 Precooked Bacon Stack (EU 020 & EU 021/CE 007)
 SV 050 Bacon Bits Line (EU 029/CE 025)

| What to do | Why to do it |
|--|--|
| EMISSION LIMITS | hdr |
| Total Particulate Matter: less than 0.30 grains/dry standard cubic foot unless required to reduce emissions to meet the less stringent limit of either 7011.0730 or 7011.0735 (table 1 and 2, respectively). This limit applies individually to each stack/vent. | Minn. R. 7011.0715, subp. 1(A) |
| Opacity: less than or equal to 20 percent opacity . This limit applies individually to each stack/vent. | Minn. R. 7011.0715, subp. 1(B) |
| OPERATING REQUIREMENTS | hdr |
| Vent all emissions from GP 005 precooked process equipment through the corresponding mist eliminator (CE 006, CE 007, or CE 025). | Minn. R. 7007.0800, subp. 2 |
| CONTROL EQUIPMENT REQUIREMENTS | hdr |
| The Permittee shall operate and maintain each mist eliminator in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff. | Minn. R. 7007.0800, subp. 14 |
| Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop and water flow rate for each mist eliminator, as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the mist eliminator is controlling emissions. | Minn. R. 7007.0800, subp. 4 |
| CE 006 and CE 007 Pressure Differential: Not less than 0 inches wc and not more than 2 inches wc for each mist eliminator when controlling precooked process emissions. | Minn. R. 7007.0800, subp. 14 |
| CE 006 and CE 007 Minimum Water Flow Rate: Not less than 1 gallon per minute, for each mist eliminator when controlling precooked process emissions. | Minn. R. 7007.0800, subp. 14 |
| CE 025 Pressure Differential: Less than 2 inches wc when controlling process emissions. | Minn. R. 7007.0800, subp. 14 |
| CE 025 Minimum Water Flow Rate when controlling process emissions: Filter: not less than 2 gallon per minute; Upper Intake: not less than 1 gallon per minute Lower Intake: not less than 1 gallon per minute | Minn. R. 7007.0800, subp. 14 |
| Daily Monitoring: Once each day of operation, the Permittee shall monitor and record the pressure differential and water flow rate for each mist eliminator that is controlling any GP 005 precooked process emissions. | Minn. R. 7007.0800, subp. 4 and 5 |
| Periodic Inspections: Once per calendar quarter, or at a frequency prescribed by the manufacturer, the Permittee shall inspect the components of each mist eliminator. The Permittee shall maintain a written record of the results of each inspection. | Minn. R. 7007.0800, subp. 4, 5, and 14 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Hormel Foods Corp/QPP - Austin
Permit Number: 09900002 - 009

| | |
|--|---|
| <p>Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur:</p> <ul style="list-style-type: none">- the pressure drop across any mist eliminator is outside the required operating range;- the water flow rate for any mist eliminator is less than the required minimum; or- any mist eliminator or any of its components are found during any inspection to need repair. <p>Corrective actions shall return the pressure drop to within the permitted range, restore the water flow rate to at least the required minimum, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the mist eliminator. The Permittee shall keep a record of the type and date of any corrective action taken for any of the mist eliminators.</p> | <p>Minn. R. 7007.0800, subp. 4, 5, and 14</p> |
|--|---|

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: GP 010 Blood and Bone Meal Dryers**Associated Items:** CE 018 Venturi Scrubber

CE 019 Packed-Gas Adsorption Column

CE 024 Packed-Gas Adsorption Column

EU 036 Existing Scott Bone Dryer

EU 050 New Duske Blood Dryer

EU 071 Room Air - Blood & Bone Drying

SV 033 Blood & Bone Dryers CE 018/CE 024 (venturi & packed tower E; bypasses packed tower F) (EU 036/EU 050)

SV 045 Blood & Bone Dryers CE 018/CE 019/CE 024 (venturi & packed towers E and F) (EU 036/EU 050)

| What to do | Why to do it |
|--|--|
| EMISSION LIMITS | hdr |
| Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot unless required to reduce emissions to meet the less stringent limit of either 7011.0730 or 7011.735 (table 1 and 2, respectively.) | Minn. R. 7011.0715, subp. 1(A) |
| Opacity: less than or equal to 20 percent | Minn. R. 7011.0715, subp. 1(B) |
| OPERATING REQUIREMENTS | hdr |
| Vent emissions from both the blood and bone dryers through CE 018 (venturi scrubber) and then through CE 024 (Tower E). After CE 024 the Permittee has the option of routing emissions to CE 019 (Tower F), and then through SV 045, or bypass CE 019 and vent emissions from CE 024 through SV 033. | Minn. R. 7007.0800, subp. 2 |
| CE 018 (VENTURI SCRUBBER), CE 019 (TOWER F) AND CE 024 (TOWER E) CONTROL EQUIPMENT REQUIREMENTS | hdr |
| The Permittee shall operate and maintain CE 018, CE 019, and CE 024 in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff. | Minn. R. 7007.0800, subp. 14 |
| Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop and water flow rate for CE 018, CE 019, and CE 024, as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when CE 018, CE 019, and CE 024 are in operation. | Minn. R. 7007.0800, subp. 4 |
| CE 018 Pressure Differential: greater than or equal to 5 inches wc. CE 019 Pressure Differential: less than 7 inches wc. CE 024 Pressure Differential: less than 5 inches wc. | Minn. R. 7007.0800, subp. 14 |
| CE 018 Water Flow Rate: not less than 10 gallons per minute CE 019 Water Flow Rate: not less than 150 gallons per minute CE 024 Water Flow Rate: not less than 50 gallons per minute | Minn. R. 7007.0800, subp. 14 |
| CE 018, CE 019, and CE 024 Daily Monitoring: Once each day of operation, the Permittee shall monitor and record the pressure differential and the water flow rate for CE 018, CE 019, and CE 024. | Minn. R. 7007.0800, subp. 4 and 5 |
| Periodic Inspections: Once per calendar quarter, or at a frequency prescribed by the manufacturer, the Permittee shall inspect the components of CE 018, CE 019, and CE 024. The Permittee shall maintain a written record of the results of each inspection. | Minn. R. 7007.0800, subp. 4, 5, and 14 |
| Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the pressure drop is outside the required operating range; - the water flow rate is below the permitted minimum; or - the scrubber or any of its components are found during any inspection to need repair. Corrective actions shall return the pressure drop to within the permitted range, the water flow rate to at least the required minimum, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for CE 018, CE 019, and CE 024. The Permittee shall keep a record of the type and date of any corrective action taken. | Minn. R. 7007.0800, subp. 4, 5, and 14 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-10

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: GP 011 Electric Power Generators

Associated Items: EU 080 Generator #1

EU 081 Generator #2

EU 082 Generator #3

EU 083 Generator #4

EU 084 Generator #5

EU 085 Generator #6

EU 086 Generator #7

| What to do | Why to do it |
|--|---|
| LIMITS AND OPERATIONAL REQUIREMENTS | hdr |
| Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained. | Minn. R. 7011.2300, subp. 1 |
| Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input | Minn. R. 7011.2300, subp. 2 |
| Permitted fuel: diesel fuel only. | Minn. R. 7007.0800, subp. 2 |
| Diesel fuel sulfur content: less than or equal to 0.05 percent by weight. | Minn. R. 7007.0800, subp. 2 |
| Total GP 011 Operating Hours: less than or equal to 65 hours/day | Minn. R. 7007.0800, subp. 2 |
| MONITORING AND RECORDKEEPING | hdr |
| Diesel Fuel Supplier Certification: For each diesel fuel delivery, obtain a supplier certification either stating the actual sulfur content in percent by weight or certifying that the sulfur content does not exceed 0.05 percent by weight. | Minn. R. 7007.0800, subp. 4 and 5 |
| Recordkeeping - GP 011 Operating Hours: Once each day the Permittee shall calculate and record the total GP 011 operating hours for the previous calendar day. By the 15th day of each month, calculate and record the total GP 011 operating hours for the previous calendar month. | Title I Condition: To limit potential NOx emissions to less than the major source levels defined in 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5 |
| Recordkeeping - Fuel Usage: Once each day the Permittee shall calculate and record the GP 011 diesel fuel usage (gallons) for the previous calendar day. By the 15th day of each month, calculate and record the total GP 011 diesel fuel usage (gallons) for the previous calendar month. | Title I Condition: To limit potential SO2 emissions to less than the major source levels defined in 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5 |
| Sulfur Dioxide Emissions Monitoring: by the 15th day of each month, calculate and record GP 011 SO2 emissions for the previous calendar month using the following equation: $GP\ 011\ SO_2 = (Dg * 6.92E-03)/2000$ where: GP 011 SO2 = GP 011 SO2 emissions, in tons Dg = diesel fuel combusted by GP 011 units during the previous month, in gallons 6.92E-03 = conversion factor derived from fuel heat content (0.137 mmBtu/gallon) and sulfur content limit (0.05% by weight equivalent to 0.0505 lb/mmBtu) | Minn. R. 7007.0800, subp. 4 and 5 |
| Nitrogen Oxides Emissions Monitoring: by the 15th day of each month, calculate and record GP 011 NOx emissions for the previous calendar month using the following equation: $GP\ 011\ NO_x = (OH * EF)/2000$ where: GP 011 NOx = GP 011 NOx emissions, in tons OH = GP 011 units total operating hours during the previous month EF = NOx lb/hr emission factor; upon issuance of this permit the Permittee shall use the manufacturer's 48.92 lb/hr NOx emission factor This NOx lb/hr emission factor will be revised upon written MPCA approval of the latest NOx emission factor performance test results. An EF determined for one unit applies to all seven units for determining the GP 011 12-month rolling sum NOx emissions. | Minn. R. 7007.0800, subp. 4 and 5 |
| PERFORMANCE TESTING | hdr |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-11**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

| | |
|--|---|
| Initial Performance Test: due 180 days after Equipment Installation to determine the lb/hr NOx emission factor from one generator. Testing is due 180 days after completion of installation of the last of the seven generators. | Title I Condition: To limit potential NOx emissions to less than the major source levels defined in 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1 |
| Initial Performance Test: due 180 days after Equipment Installation to measure opacity from one generator. Testing is due 180 days after completion of installation of the last of the seven generators. | Minn. R. 7017.2020, subp. 1 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-12**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: GP 012 Boilers**Associated Items:** EU 001 Boiler #1

EU 002 Boiler #2

EU 003 Boiler #3

EU 004 Boiler #4

EU 005 Boiler #5

EU 044 Boiler #6

EU 045 Boiler #7

| What to do | Why to do it |
|--|-----------------------------------|
| EMISSION LIMITS | hdr |
| Sulfur Dioxide: less than or equal to 2.0 lbs/million Btu heat input when combusting residual fuel oil (applies individually to EU 001 through EU 004). | Minn. R. 7011.0515, subp. 1 |
| Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (applies individually to EU 001 through EU 005). | Minn. R. 7011.0515, subp. 1 |
| Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity (applies individually to EU 001 through EU 005). | Minn. R. 7011.0515, subp. 2 |
| OPERATING LIMITS | hdr |
| Permitted Fuels: EU 001 through EU 004: Limited to natural gas, No. 6 fuel oil, used oil, and refined animal fats (RAF) EU 005: natural gas only EU 044, and EU 045: natural gas and RAF | Minn. R. 7007.0800, subp. 2 |
| The used oil combusted in EU 001 through EU 004 shall be used oil which is defined as any oil which has been used and as a result of such use has become contaminated by physical or chemical impurities. The used oil shall not contain any hazardous waste listed in Minn. R. 7045.0135. The used oil must be on-specification and meet the following restrictions: 1) Total Arsenic not to exceed 5 ppm 2) Total Cadmium not to exceed 2 ppm 3) Total Chromium not to exceed 10 ppm 4) Total Lead not to exceed 100 ppm 5) Flash point not less than 100 degrees F 6) Total Halogens not to exceed 1,000 ppm The Permittee must obtain and keep on-site for at least five years a laboratory analysis demonstrating that the used oil is on-specification. Laboratory analyses shall also indicate the used oil sulfur content in percent by weight. | Minn. R. 7007.0800, subp. 2 |
| Fuel Usage: less than or equal to 15000 gallons/year using 12-month Rolling Sum of used oil as a total in EU 001 through EU 004. | Minn. R. 7007.0800, subp. 2 |
| Limit boiler operation to a level at or below that of the most recent particulate matter performance test that measured emissions at or below the applicable particulate matter emission limit. | Minn. R. 7017.2025 |
| MONITORING | hdr |
| Determination of Sulfur Content of Fuel Oil In Storage Tanks: Immediately after any delivery of fuel oil for use in EU 001, EU 002, EU 003, and/or EU 004, the Permittee shall determine and record the sulfur content of the fuel oil, in percent by weight, in the fuel oil storage tanks using either Method 1 or Method 2: | Minn. R. 7007.0800, subp. 4 and 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS
A-13

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

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|--|---|
| <p>Method 1: Using fuel supplier certification, calculate the fuel oil sulfur content as follows:</p> <p>Obtain and maintain a fuel supplier certification for each delivery of fuel oil that specifies actual sulfur content in percent by weight of the delivered fuel oil. Calculate and record the sulfur content after each fuel oil delivery, based on the known sulfur content and fuel volume in the tanks prior to delivery, and the percent sulfur content and volume of the fuel delivery, as follows:</p> $So = [(Ve * Se) + (Vd * Sd)]/Vt$ <p>where: So = sulfur content of fuel oil after delivery (% by wt) Ve = total fuel oil volume in tanks before delivery (gallons) Se = sulfur content of oil in tanks before delivery (% by wt) Vd = volume of delivery (gallons) Sd = sulfur content (% by wt) of delivered fuel oil based on supplier certification Vt = total fuel volume in tanks after delivery, $Vt = Ve + Vd$ (gallons)</p> <p>OR</p> | Minn. R. 7007.0800, subp. 4 and 5 |
| <p>Method 2: Sample and analyze the fuel oil in the common header for the three storage tanks that supplies fuel oil to EU 001 - EU 004. Sample and analyze after each delivery but not more than once each calendar week when multiple deliveries are made in a calendar week. Sample within 48 hours after any delivery or within 48 hours after the last of multiple deliveries in a calendar week.</p> <p>Record the date and time of each delivery and sampling, initials of person recording the information, and results of the fuel oil sulfur content analysis in percent by weight. Analyze the sample to determine sulfur content in percent by weight according to ASTM D-1552 or current ASTM method.</p> | Minn. R. 7007.0800, subp. 4 and 5 |
| RECORDKEEPING | hdr |
| <p>Separately record and maintain records of the quantity of natural gas combusted by EU 044 and the quantity of natural gas combusted by EU 045, on a monthly basis.</p> | 40 CFR Section 60.48c(g) |
| <p>Recordkeeping - Fuel Usage: Once each day calculate and record the GP 012 usage of fuel oil (gallons), used oil (gallons), and natural gas (cubic feet), the RAF usage in EU 001 through EU 004 (gallons), and the RAF usage in EU 044 and 045 (gallons), during the previous calendar day.</p> <p>By the 15th day of each month, calculate and record the GP 012 usage of fuel oil (gallons), used oil (gallons), and natural gas (cubic feet), the RAF usage in EU 001 through EU 004 (gallons), and the RAF usage in EU 044 and 045 (gallons), during the previous calendar month.</p> | Title I Condition: To limit potential SO ₂ and NO _x emissions to less than major source levels defined by 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5 |
| <p>Sulfur Dioxide Emissions Monitoring: By the 15th day of each month the Permittee shall calculate and record the tons of SO₂ emitted during the previous calendar month from the GP 012 combustion of fuel oil, used oil, and RAF, using the following equation:</p> $SO_2 = (0.157AX + 0.157BY + 0.157CZ)/2000$ <p>where:</p> <p>SO₂ = GP 012 sulfur dioxide emissions during the previous month (tons) A = GP 012 gallons of fuel oil burned during the previous month B = GP 012 gallons of used oil burned during the previous month C = GP 012 gallons of refined animal fat burned during the previous month X = weight percent of sulfur in fuel oil burned the previous month as determined by Method 1 or 2 described above Y = weight percent of sulfur in used oil burned the previous month Z = weight percent of sulfur in RAF burned the previous month</p> | Minn. R. 7007.0800, subp. 4 and 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-14**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

| | |
|---|--|
| <p>Nitrogen Oxides Emissions Monitoring: By the 15th day of each month the Permittee shall calculate and record the tons of NOx emitted from GP 012 during the previous calendar month using the following equation:</p> $\text{NOx} = (0.055A + X1B1 + X2B2 + 0.0001C)/2000$ <p>where:</p> <p>NOx = GP 012 nitrogen oxides emissions during the previous month (tons) A = GP 012 gallons of fuel oil and used oil burned during the previous month B1 = GP 012 gallons of RAF burned during the previous month in EU 001 - 004 B2 = GP 012 gallons of RAF burned during the previous month in EU 044 & 045 X1 = NOx emission factor in lb of NOx/gallon of RAF from most recent test while combusting RAF in EU 001 - 004 X2 = NOx emission factor in lb of NOx/gallon of RAF from most recent test while combusting RAF in EU 044 & 045 (if RAF NOx emission testing data is not available, X1 and/or X2 shall be 0.0366 lb/gal) C = GP 012 cubic feet of natural gas combusted during the previous month</p> | Minn. R. 7007.0800, subp. 4 and 5 |
| PERFORMANCE TESTING AND ANALYSIS | hdr |
| <p>RAF Sulfur Content: Perform an analysis during each 12-month period following permit issuance to determine weight percent sulfur content in RAF. The first analysis shall be performed within 180 days of permit issuance.</p> | Title I Condition: To limit potential SO2 emissions to less than major source levels defined by 40 CFR Section 52.21; Minn. R. 7007.3000 |
| <p>Performance Test: due before end of each calendar 60 months starting 09/15/2002 to measure NOx emissions while combusting only RAF in either EU 001, EU 002, EU 003, or EU 004. Testing is required only if a total of more than 500,000 gallons of RAF has been combusted in EU 001 through EU 004 during the 60-month period starting 09/15/2002.</p> | Title I Condition: To limit potential NOx emissions to less than major source levels defined by 40 CFR Section 52.21; Minn. R. 7007.3000 |
| <p>Performance Test: due 180 days after Initial Startup of RAF combustion in EU 044 and/or EU 045, to measure NOx emissions. Testing shall be conducted when combusting only RAF, and on either EU 044 or EU 045.</p> | Title I Condition: To limit potential NOx emissions to less than major source levels defined by 40 CFR Section 52.21; Minn. R. 7007.3000 |
| <p>Performance Test: due before end of each calendar 60 months starting 01/01/2006 to measure PM and opacity while combusting No. 6 fuel oil in EU 001, EU 002, or EU 003, and while combusting No. 6 fuel oil in EU 004. For EU 001 through EU 003, the Permittee shall always test the emission unit whose previous test is the least current. EU 004 shall be tested every 60 months.</p> | Minn. R. 7017.2020, subp. 1 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-15**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: EU 027 Rendering Room Air**Associated Items:** CE 008 Packed-Gas Adsorption Column

SV 026 Rendering Process & Room Air Packed Tower Scrubbers Stack (EU 027 & EU 028)

| What to do | Why to do it |
|--|--|
| EMISSION LIMITS | hdr |
| Total Particulate Matter: less than or equal to 8.38 lbs/hour | Title I Condition: To limit potential PM emissions to less than major source levels as defined by 40 CFR 52.21; Minn. R. 7007.3000; meets requirements of Minn. R. 7011.0715, subp. 1(A) |
| Particulate Matter < 10 micron: less than or equal to 8.38 lbs/hour | Title I Condition: To limit potential PM10 emissions to less than major source levels as defined by 40 CFR 52.21; Minn. R. 7007.3000 |
| Opacity: less than or equal to 20 percent opacity | Minn. R. 7011.0715, subp. 1(B) |
| OPERATING REQUIREMENTS | hdr |
| Vent all Rendering Room Air emissions through CE 008. | Minn. R. 7007.0800, subp. 2 |
| CE 008 (TOWER A) CONTROL EQUIPMENT REQUIREMENTS | hdr |
| The Permittee shall operate and maintain CE 008 in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff. | Minn. R. 7007.0800, subp. 14 |
| Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop and water flow rate for CE 008, as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when CE 008 is in operation. | Minn. R. 7007.0800, subp. 4 |
| CE 008 Pressure Differential: Not less than 5 inches wc. | Minn. R. 7007.0800, subp. 14 |
| CE 008 Water Flow Rate: Not less than 100 gallons per minute. | Minn. R. 7007.0800, subp. 14 |
| CE 008 Daily Monitoring: Once each day of operation, the Permittee shall monitor and record the pressure differential and the water flow rate for CE 008. | Minn. R. 7007.0800, subp. 4 and 5 |
| Periodic Inspections: Once per calendar quarter, or at a frequency prescribed by the manufacturer, the Permittee shall inspect the components of CE 008. The Permittee shall maintain a written record of the results of each inspection. | Minn. R. 7007.0800, subp. 4, 5, and 14 |
| Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the pressure drop is below the required minimum; - the water flow rate is below the permitted minimum; or - the scrubber or any of its components are found during any inspection to need repair. Corrective actions shall return the pressure drop to within the permitted range, the water flow rate to at least the required minimum, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for CE 008. The Permittee shall keep a record of the type and date of any corrective action taken. | Minn. R. 7007.0800, subp. 4, 5, and 14 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-16**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: EU 028 Rendering Machinery**Associated Items:** CE 008 Packed-Gas Adsorption Column

CE 009 Venturi Scrubber

CE 022 Packed-Gas Adsorption Column

CE 023 Packed-Gas Adsorption Column

SV 026 Rendering Process & Room Air Packed Tower Scrubbers Stack (EU 027 & EU 028)

SV 027 Rendering Process Scrubber Bypass Stack (EU 028)

| What to do | Why to do it |
|--|--|
| EMISSION LIMITS | hdr |
| Total Particulate Matter: less than or equal to 7.34 lbs/hour for SV 027. This limit applies when EU 028 emissions are controlled by CE 009 (venturi scrubber), CE 022 (Tower B), and CE 023 (Tower C) and vented through SV 027 (rendering process equipment bypass stack). See EU 027 for applicable limit when EU 028 emissions are controlled by CE 009 & CE 008 (Tower A) and vented through SV 026 (main stack). | Title I Condition: To limit potential PM emissions to less than major source levels as defined by 40 CFR 52.21; Minn. R. 7007.3000; meets requirements of Minn. R. 7011.0715, subp. 1(A) |
| Particulate Matter < 10 micron: less than or equal to 7.34 lbs/hour for SV 027. This limit applies when EU 028 emissions are controlled by CE 009 (venturi scrubber), CE 022 (Tower B), and CE 023 (Tower C) and vented through SV 027 (rendering process equipment bypass stack). See EU 027 for applicable limit when EU 028 emissions are controlled by CE 009 & CE 008 (Tower A) and vented through SV 026 (main stack). | Title I Condition: To limit potential PM10 emissions to less than major source levels as defined by 40 CFR 52.21; Minn. R. 7007.3000 |
| Opacity: less than or equal to 20 percent opacity for SV 027. | Minn. R. 7011.0715, subp. 1(B) |
| OPERATING REQUIREMENTS | hdr |
| Vent all emissions from Rendering Machinery through CE 009 (venturi scrubber), and then CE 022 (Tower B) and CE 023 (Tower C). After CE 023 the Permittee has the option of routing emissions to CE 008 (Tower A) and then through SV 026, or bypass CE 008 and vent from CE 023 through SV 027. | Minn. R. 7007.0800, subp. 2 |
| CE 009 (VENTURI SCRUBBER), CE 022 (TOWER B), AND CE 023 (TOWER C) CONTROL EQUIPMENT REQUIREMENTS | hdr |
| The Permittee shall operate and maintain CE 009, CE 022, and CE 023 in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff. | Minn. R. 7007.0800, subp. 14 |
| Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop and water flow rate as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when CE 009, CE 022, and CE 023 are in operation. | Minn. R. 7007.0800, subp. 4 |
| CE 009, CE 022, and CE 023 Pressure Differential: Less than 5 inches wc for CE 022, less than 5 inches wc for CE 023, and not less than 5 inches wc for CE 009. | Minn. R. 7007.0800, subp. 14 |
| CE 009, CE 022, and CE 023 Water Flow Rate: Not less than 20 gallons per minute for CE 022, not less than 30 gallons per minute for CE 023, and not less than 50 gallons per minute for CE 009. | Minn. R. 7007.0800, subp. 14 |
| CE 009, CE 022, and CE 023 Daily Monitoring: Once each day of operation, the Permittee shall monitor and record the pressure differential and water flow rate for CE 009, CE 022, and CE 023. | Minn. R. 7007.0800, subp. 4 and 5 |
| Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturer, the Permittee shall inspect the components of CE 009, CE 022, and CE 023. The Permittee shall maintain a written record of the results of each inspection. | Minn. R. 7007.0800, subp. 4, 5, and 14 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-17**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur:

- the pressure drop of the venturi scrubber or any packed tower is below the required minimum;
- the water flow rate of the venturi scrubber or any packed tower is below the permitted minimum; or
- the venturi scrubber or the packed towers or any of their components are found during any inspection to need repair.

Corrective actions shall return the pressure drop to within the permitted range, return the water flow rate to at least the permitted minimum, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the venturi scrubber and packed towers. The Permittee shall keep a record of the type and date of any corrective action taken.

Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-18**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

Subject Item: EU 051 Emergency RICE(s)**Associated Items:** GP 001 SO2 and NOx Limits

SV 044 Emergency RICE(s) (EU 051)

| What to do | Why to do it |
|---|---|
| LIMITS AND OPERATING REQUIREMENTS | hdr |
| Operating Hours: less than or equal to 500 hours/year using 12-month Rolling Sum as a total for all emergency RICE. | Minn. R. 7007.0800, subp. 2 and September 6, 1995, U.S. EPA memorandum entitled "Calculating Potential to Emit for Emergency Generators" |
| Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input | Minn. R. 7011.2300, subp. 2 |
| Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained. | Minn. R. 7011.2300, subp. 1 |
| Emergency Reciprocating Internal Combustion Engine (RICE) Operation: The Permittee is authorized to operate temporary or permanent emergency RICE at the facility, providing the total horsepower of all emergency RICE does not exceed 599 hp on a calendar-day basis, and any single engine does not exceed 500 hp. | Minn. R. 7007.0800, subp. 2 |
| Permitted Fuels: gasoline, diesel fuel, natural gas, kerosene/naphtha, butane, or propane. | Minn. R. 7007.0800, subp. 2 |
| Operation of Emergency RICE(s): The EU 051 Emergency RICE(s) shall only operate under emergency situations. An emergency RICE is a reciprocating internal combustion engine which only operates when no other mechanical power source is available to meet life safety and temporary production requirements, and operates for necessary routine periodic equipment testing. Life safety and temporary production requirements do not occur during routine operation or production and are circumstances demanding power to avoid death, illness, injury, or damage to process equipment or product. An emergency RICE is a power source used to generate electricity, pump water or other liquids, or other application. Emergency RICE does not include RICE electric generators operated by an electric customer during periods of intentional electric service disruption by the electric service provider or a RICE used as a substitute for another power source that is undergoing scheduled maintenance. | Minn. R. 7007.0800, subp. 2 |
| RECORDKEEPING | hdr |
| Recordkeeping: For each emergency RICE that is operated at the facility, the Permittee shall record the arrival and departure date of the engine. Once each day, the Permittee shall record in a log the serial number, model, manufacturer, horsepower rating and hours of operation of each emergency RICE that operated at the facility during the previous calendar day. If no emergency RICE were operated, the log shall indicate this. By the 15th day of each month, the Permittee shall calculate and record the total emergency RICE operating hours for the previous month, and the previous 12-month period. | Minn. R. 7007.0800, subp. 4 and 5 |
| Diesel Fuel Supplier Certification: For each delivery of diesel fuel, the Permittee shall obtain a supplier certification that either states the actual sulfur content in percent by weight in the diesel fuel, or guarantees that the sulfur content does not exceed a prescribed maximum amount, in percent by weight. | Minn. R. 7007.0800, subp. 4 and 5 |
| Recordkeeping - Fuel Usage: Once each day calculate and record the EU 051 usage of gasoline (gallons), diesel fuel (gallons), natural gas (cubic feet), kerosene/naphtha (gallons), butane (gallons), or propane (gallons), during the previous calendar day. By the 15th day of each month, calculate and record the EU 051 usage of gasoline (gallons), diesel fuel (gallons), natural gas (cubic feet), kerosene/naphtha (gallons), butane (gallons), or propane (gallons), during the previous calendar month. The Permittee shall convert and record the monthly fuel usage from a volume basis, to a heat input basis according to the procedure in the appendix. | Title I Condition: To limit potential NOx emissions to less than major source levels defined by 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5 |
| Nitrogen Oxides Emissions Monitoring: By the 15th day of each month the Permittee shall: 1) Calculate and record EU 051 NOx emissions during the previous calendar month using the following equation: $\text{NOx} = (\text{Fa} * \text{Ha}) + (\text{Fb} * \text{Hb}) + (\text{Fc} * \text{Hc}) + (\text{Fd} * \text{Hd}) + (\text{Fe} * \text{He}) + (\text{Ff} * \text{Hf})$ (continued) | Minn. R. 7007.0800, subp. 4 and 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-19**

06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

| | |
|---|--|
| <p>where: NOx = EU 051 pounds NOx/month Fa = diesel fuel emission factor Ha = diesel fuel heat input Fb = natural gas emission factor Hb = natural gas heat input Fc = gasoline emission factor Hc = gasoline heat input Fd = propane emission factor Hd = propane heat input Fe = kerosene/naphtha emission factor He = kerosene/naphtha heat input Ff = butane emission factor Hf = butane heat input</p> <p>All heat inputs are in units of mmBtu per month and determined according to the procedure in the appendix. Emission factors (lb/mmBtu) are listed in the appendix, or obtained from the current version of AP-42 or the current MPCA emission calculation form for internal combustion engines, if more current than the appendix.</p> | <p>Minn. R. 7007.0800, subp. 4 and 5</p> |
|---|--|

TABLE B: SUBMITTALS

B-1 06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin
Permit Number: 09900002 - 009

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**B-2** 06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

| What to send | When to send | Portion of Facility Affected |
|------------------------|---|------------------------------|
| Notification | due 15 days after Equipment Installation is complete. This notification is due after completion of installation of the the last of the seven GP 011 power generators (EU 080 through EU 086). | GP011 |
| Testing Frequency Plan | <p>due 60 days after Initial Performance Test for determining the NOx lb/hr emission factor testing and opacity. The plan shall specify a testing frequency for NOx and opacity based on the initial performance test data and MPCA guidance. Future performance tests based on 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the plan by the MPCA.</p> <p>Future testing shall be conducted on a unit not previously tested. After testing all units, testing shall be conducted on the unit whose previous test is least current.</p> | GP011 |
| Testing Frequency Plan | due 60 days after Performance Test - Retest. The plan shall specify a testing frequency for PM and opacity based on recent performance test results and MPCA guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon MPCA written approval of the plan. | GP003 |

TABLE B: RECURRENT SUBMITTALS**B-3** 06/21/06

Facility Name: Hormel Foods Corp/QPP - Austin

Permit Number: 09900002 - 009

| What to send | When to send | Portion of Facility Affected |
|------------------------------|---|------------------------------|
| Semiannual Deviations Report | due 30 days after end of each calendar half-year starting 08/05/1999 . The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. | Total Facility |
| Compliance Certification | due 31 days after end of each calendar year starting 08/05/1999 (for the previous calendar year). The certification shall be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. | Total Facility |

APPENDIX MATERIAL

Facility Name: Hormel Foods Corp/QPP - Austin
Permit Number: 09900002-009

1. EU 051 Nitrogen Oxides Emission Factors and Fuel Heat Contents

| Fuel Type | NOx Emission Factor (lb/mmBtu) | Fuel Heat Content |
|------------------|-----------------------------------|-------------------------|
| Gasoline | 1.63 | 0.13 mmBtu/gallon |
| Diesel Fuel | 4.41 | 0.137 mmBtu/gallon |
| Natural Gas | 4.08 | 0.0105 mmBtu/cubic foot |
| Kerosene/naphtha | 3.474 | 0.135 mmBtu/gallon |
| Propane | 1.519 | 0.0915 mmBtu/gallon |
| Butane | 1.355 | 0.1026 mmBtu/gallon |

Conversion of Fuel Volume to Heat Input:

$F_v * F_h = \text{Fuel Heat Input (mmBtu/month)}$

Where:

F_v = volume of fuel used (gallons or cubic feet per month)

F_h = fuel heat content as listed above (mmBtu/gallon or mmBtu/cubic foot)

2. Insignificant Activities Required to be Listed

| Minn. R. 7007.1300, subp. | Activity | Applicable Minn. R. Standard |
|---------------------------|--|---------------------------------------|
| 3.A | Space Heaters - N Holding Pen 2 @0.32 mmBtu/hr | 7011.0515 PM and opacity |
| 3.A. | Shop Space Heater 0.75 mmBtu/hr | 7011.0515 PM and opacity |
| 3.A. | Break Room Space Heater 0.125 mmBtu/hr | 7011.0515 PM and opacity |
| 3.E(1) | 500 gallon gasoline tank at QPP | |
| 3.F | Laundry units 2 @0.25 mmBtu/hr & 2 @0.20 mmBtu/hr | 7011.0515 PM and opacity |
| 3.H(3) | 4 welding stations and several portable welders | 7011.0715 PM and opacity |
| 3.I | Nine vacuum pump vents | 7011.0715 PM and opacity |
| 3.I | GP Salt System | 7011.0715 PM and opacity |
| 3.I | GP Sugar System | 7011.0715 PM and opacity |
| 3.I | 12 smoked meat/prepared sausage ovens w/smoke flavor spray | 7011.0610 PM and opacity |
| 3.I | Precooked Bacon Oven Room Vent | 7011.0715 PM and opacity |
| 3.I | Three vacuum pump vents | 7011.0715 PM and opacity |
| 3.I | MP Salt System | 7011.0715 PM and opacity |
| 3.I | 17 dry sausage ovens | 7011.0715 PM and opacity |
| 3.I | Two vacuum pump vents | 7011.0715 PM and opacity |
| 3.I | Two 200,000 gallon fuel oil tanks | 7011.1505 |
| 3.I | One 100,000 gallon fuel oil tank | 7011.1505 |
| 3.I | One 500 gallon diesel fuel tank @QPP | |
| 3.I | One 200,000 gallon lard tank - steam heated | |
| 3.I | One 200,000 gallon tallow tank - steam heated | |
| 3.I | Five dehairing room vents | |
| 3.I | KC-7 MAH @2.16 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | Kill Floor MAU @1.0 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | Dessicant Air Handler @0.273 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | RWO MAU @0.243 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | Drench Cabinet MAU @0.21 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | Pig Skin Salt System | 7011.0715 PM and opacity |
| 3.I | Office boiler @0.396 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | Rendering MAU @2.17 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | Hog Hair Hydrolyzer | 7011.0715 PM and opacity |
| 3.I | New Boiler Room MAU @1.361 mmBtu/hr | 7011.0515 PM and opacity |
| 3.I | Natural Gas Standby Generator | 7011.2300 SO ₂ and opacity |
| 4 | Three vapor smoke generators | 7011.0715 PM and opacity |
| 4 | Old Boiler Room MAU @5.616 mmBtu/hr | 7011.0515 PM and opacity |
| 4 | Two Radiant Wall Ovens @3.0 mmBtu/hr each | 7011.0610 PM and opacity |
| 4 | Hog Hair Singer #1 @8 mmBtu/hr | 7011.0715 PM and opacity |
| 4 | Hog Hair Singer #2 @6.5 mmBtu/hr | 7011.0715 PM and opacity |
| 4 | KC-9 MAH @5.612 mmBtu/hr | 7011.0515 PM and opacity |
| 4 | Two Rendering MAH @2.48 mmBtu/hr each | 7011.0515 PM and opacity |
| 4 | Room Air - Blood/Bone Drying | 7011.0715 PM and opacity |
| 4 | Dock Area Room Air | 7011.0715 PM and opacity |
| 4 | Dock Area Surface Vents | 7011.0715 PM and opacity |
| 4 | Two Hog Cut Space Heaters @ 4mmBtu/hr each | 7011.0515 PM and opacity |
| 4 | Two Pretreatment Space Heaters @ 2.313 mmBtu/hr each | 7011.0515 PM and opacity |
| 4 | Two Front End Kill Space Heaters @3.255 mmBtu/hr each | 7011.0515 PM and opacity |
| Minn. R. 7008.4110 | Maintenance grinding & sawdust cyclone vented indoors 100% of the time | 7011.0715 PM and opacity |

3. GP 011 Modeling Parameters

| stack/vent number | emission unit | stack height (feet) | flow rate (acfm) | stack diameter (feet) | stack temperature °F | UTM Easting (m) | UTM Northing (m) | NOx lb/hr |
|----------------------|------------------|---------------------------|---------------------|-----------------------------|----------------------------|-----------------------|------------------------|--------------|
| SV 051 | EU 080 | 35 | 15185 | 1.33 | 835 | 502805.2 | 4835695.6 | 48.92 |
| SV 052 | EU 081 | 35 | 15185 | 1.33 | 835 | 502805.2 | 4835791.0 | 48.92 |
| SV 053 | EU 082 | 35 | 15185 | 1.33 | 835 | 502805.2 | 4835814.5 | 48.92 |
| SV 054 | EU 083 | 35 | 15185 | 1.33 | 835 | 502805.2 | 4835838.0 | 48.92 |
| SV 055 | EU 084 | 35 | 15185 | 1.33 | 835 | 502797.0 | 4836094.5 | 48.92 |
| SV 056 | EU 085 | 35 | 15185 | 1.33 | 835 | 502797.0 | 4836102.3 | 48.92 |
| SV 057 | EU 086 | 35 | 15185 | 1.33 | 835 | 502797.0 | 4836110.1 | 48.92 |

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 09900002-009

This Technical Support Document (TSD) is for all parties interested in the permit and meets the requirements of 40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1. This document provides the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

| Applicant/Address | Stationary Source/Address (SIC Code: 2013/2011) |
|---|---|
| Hormel Foods Corporation 1 Hormel Place Austin, MN 55912-3680 | Hormel Foods Corporation 500 14 th Avenue Northeast Austin, Mower County |
| Contact: Rich Johnson Phone: (507) 437-5955 | |

1.2. Description of the Facility and this Permit Action

The Hormel Foods Corporation (Permittee) operates a meat processing plant (Facility) in Austin, Minnesota. At the Facility, Quality Pork Processor (QPP) processes hogs, and the Permittee manufacturers the hogs into ham, bacon, dry sausage, fresh sausage, SPAM[®], and other meat products. Byproducts consist of blood, cracklings, bone meal, and choice white grease (a component of a broader category of substances known as Refined Animal Fats (RAF). QPP is a co-permittee however Hormel Foods owns all equipment and operates the majority of it; QPP only operates some of the emissions equipment (insignificant combustion sources) in the processing area. This is a major amendment to the part 70 operating permit.

1.3 Description of the Activities Allowed by this Permit Action

This amendment authorizes construction and operation of seven identical 2000 kW diesel electric generators. The engines will be Caterpillar model 3516 units. The generators will be operated as peaking and emergency power units. Each unit is anticipated to operate 300 hours per year. The generators will be able to provide emergency backup power to the Austin municipal power plants and the Austin Medical Center. Each generator has its own self contained/integral 3,000 gallon fuel oil tank within the supporting framework of the base structure. The tanks are classified as a UL142 fuel tank with full steel floor plate. Also, performance testing requirements in GP 003 and GP 012 were revised based on recent testing of these sources.

1.4. Facility Emissions:

Table 1. Title I Emissions Increase Summary

| Pollutant | Emissions Increase from the Modification (tpy) | Limited Emissions Increase from the Modification (tpy) | Source-wide Contemporaneous Increases and Decreases* (tpy) | Net Emissions Increase (tpy) | PSD/112(g) Significant Thresholds for major sources | NSR/112(g) Review Required? (Yes or No) |
|------------------|--|--|--|------------------------------|---|---|
| PM | 9.2 | 1.1 | 0 | 1.1 | 250 | NO |
| PM ₁₀ | 9.2 | 1.1 | 0 | 1.1 | 250 | NO |
| NO _x | 1500 | 180 | 0 | 180 | 250 | NO |
| SO ₂ | 27.9 | 3.35 | 0 | 3.35 | 250 | NO |
| CO | 20.2 | 2.43 | 0 | 2.43 | 250 | NO |
| Ozone (VOC) | 49.8 | 5.97 | 0 | 5.97 | 250 | NO |
| Lead | 0 | 0 | 0 | 0 | 0.6 | NO |
| Benzene | 0.43 | 0.05 | NA | 0.05 | 10 | NO |
| Total HAPs | 0.94 | 0.11 | NA | 0.11 | 25 | NO |

* Other emission changes during the contemporaneous period as defined by 40 CFR § 52.21, 40 CFR § 52.24 or 40 CFR pt. 51.

Table 2. Total Facility Potential to Emit Summary

| | PM tpy | PM ₁₀ tpy | SO ₂ tpy | NO _x tpy | CO tpy | VOC tpy | Single HAP tpy | All HAPs tpy |
|--|--------|----------------------|---------------------|---------------------|--------|---------|---|--------------|
| Total Facility Limited Potential Emissions | 194 | 187 | 236 | 224 | 228 | 97 | 2.5 | 3.48 |
| Total Facility Actual Emissions (2004) | 27.04 | 21.77 | 193.83 | 75.57 | 19.89 | 2.46 | HAPs not reported in emission inventory | |

Table 3. Facility Classification

| Classification | Major/Affected Source | Synthetic Minor | Minor |
|------------------------|---|---|-----------------------|
| PSD | | PM, PM ₁₀ , SO ₂ , NO _x , CO | VOC, Pb |
| Part 70 Permit Program | PM ₁₀ , SO ₂ , NO _x , CO | VOC | |
| Part 63 NESHAP | | | single and total HAPs |

2. Regulatory and/or Statutory Basis

New Source Review

The Facility is an existing non-major source under New Source Review regulations. Changes authorized by this permit will not change this status.

Part 70 Permit Program

The Facility is a major source under the Part 70 permit program.

New Source Performance Standards (NSPS)

The changes authorized by this permit action are not subject to any NSPS.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

HAP emissions from the entire Facility after the modification will remain less than the major source level as defined under 40 CFR pt. 63. Therefore no NESHAPs apply.

Minnesota State Rules

Proposed changes at the Facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines

Table 4. Regulatory Overview of Units Affected by the Modification/Permit Amendment

| EU, GP, or SV | Applicable Regulations | Comments: |
|---------------|-----------------------------|---|
| GP 011 | Minn. R. 7011.2300 | Minnesota Standards for Internal Combustion Engines |
| | Minn. R. 7007.0800, subp. 2 | Modeling-based daily GP 011 operating hours limit; diesel fuel sulfur content limit |

3. Technical Information

NO_x Modeling

The Permittee conducted the EC-03 part 2 SCREEN3 modeling exercise but the sum of modeled impacts from the seven engines exceeded the 1-hour and 24-hour NO_x alert levels (1130 µg/m³ and 282 µg/m³, respectively). As a result, the Permittee used AERMOD-PRIME to model NO_x with the following results:

H1H 1-hour NO_x = 1056 µg/m³ including background of 0 µg/m³ (1130 µg/m³ alert level)
H1H 24-hour NO_x = 268 µg/m³ including background of 0 µg/m³ (282 µg/m³ alert level)

To calculate the hourly average emission rate value for determining the 24-hour concentration the 65 hours/day GP 011 operating limit was used. The hourly value was calculated with the following equation:

$$65 \text{ engine hr/day} * \text{hourly emission rate in lb/hr/7 engines} * 24 \text{ hr/day}$$

GP 001 Changes and Creation of GP 012

GP 001 was revised by removing all boiler requirements from GP 001 and placing these requirements in a new group, GP 012. GP 001 is now only for the NO_x and SO₂ emission cap requirements.

GP 003 Performance Testing Changes

One of the GP 003 natural smoke ovens was recently tested as required by the current permit (No. 09900002-008). The oven failed two consecutive tests for opacity and narrowly passed for PM. As a result, the permit requires re-testing for opacity. Due to the opacity test failures, the 60 month testing frequency for PM and opacity was removed and a requirement to submit a testing frequency plan for PM and opacity was added to GP 003.

GP 012 Performance Testing

Testing that was required by 60 days after 11/02/2005 was completed so this requirement has been removed.

Acid Rain Program Applicability:

Although the Permittee will provide power from the generators to the local utility and medical center, the Permittee indicated that in these situations the power will be provided without charge to the recipients. Also, all other power generated by the units will not be for sale. Therefore, the Permittee is not a *Utility* and the generators are not *Utility units* as defined under 40 CFR §72.2. therefore, the acid rain program does not apply.

3.1 Emissions from the Modification and Change in Total Facility Limited Emissions

The existing part 70 permit restricts emissions of SO₂ to 235 tpy and NO_x to 180 tpy. These caps do not apply to insignificant activities.

NO_x is the limiting pollutant for the engines. Therefore engine limited emissions for all other pollutants except SO₂ were determined by prorating based on the 180 tpy limit.

3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;

- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 5. Periodic Monitoring

| Emission Unit or Group | Requirement (basis) | Monitoring | Discussion |
|-------------------------------|---|---|--|
| GP 011 | Fuel sulfur content \leq 0.05% by wt. Minn. R. 7007.0800, subp. 2 | Diesel Fuel Sulfur Content Monitoring and Recordkeeping | Fuel supplier sulfur content certification for each diesel fuel delivery; will also be used to determine compliance with SO ₂ limit in Minn. Rules for Internal Combustion Engines. |
| | Title I Condition: To limit potential SO ₂ emissions to less than the major source levels defined in 40 CFR § 52.21 | Daily fuel usage recordkeeping | Daily fuel usage records for GP 011 emission monthly calculation of GP 011 SO ₂ emissions |
| | Title I Conditions: To limit potential NO _x emissions to less than the major source levels defined in 40 CFR § 52.21 | Operating hours recordkeeping and Performance Testing to evaluate manufacturer's NO _x emissions data | Daily operating hours records for monthly calculation of GP 011 NO _x emissions. Daily records also used to verify compliance with modeling-based GP 011 daily operating hours limit. NO _x emission factor verification testing necessary to ensure accurate NO _x emission calculations. |
| | Minn. R. 7017.2020, subp. 1 | Opacity testing | To determine compliance with Minnesota opacity limit for internal combustion engines. |

3.3 Comments Received

Public Notice Period: May 4, 2006 - June 2, 2006

EPA 45-day Review Period: May 4, 2006 - June 19, 2006

One comment was received during the public comment period. It was a letter from Austin Public Utilities in support of the proposed modification. No comments were received from EPA.

4. Conclusion

Based on the information provided by Hormel Foods Corporation, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 09900002-009, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Marshall Cole (permit writer/engineer)
 Greg Berger (enforcement)
 Steve Gorg (stack testing)
 Chris Nelson (modeling)
 Mike Westereng (peer reviewer)

Attachments: 1. Emission Calculations
 2. Modeling Checklist