

AIR EMISSION PERMIT NO. 01900001- 002

IS ISSUED TO

BONGARDS' CREAMERIES INC.

Bongards' Creameries
13200 County Road 51
Norwood, Carver County, MN 55368

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):

<u>Permit Type</u>	<u>Application Date</u>
Total Facility Operating Permit	January 20, 1995
Total Facility Operating Permit update	April 29, 2002
MCPA-initiated Major Amendment	January 8, 2004

This permit authorizes the Permittee to operate 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; Pt 70/Limits to avoid NSR

Major Modification:

Issue Date: November 7, 2003

Issue Date: June 28, 2004

Expiration: November 7, 2008

All Title I Conditions do not expire.

Ann M. Foss
Major Facilities Section Manager
Majors and Remediation 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 Permittee owns and operates a cheese and whey powder facility consisting of a variety of equipment including boilers (which burn natural gas, #2 fuel oil and #6 fuel oil), dryers, and baggers. The facility is a major source of NO_x, CO and SO_x emissions from fuel-burning equipment (boilers and dryers). The source is also a significant PM source, but it is equipped with baghouses and cyclones that recover much of the PM emissions as product. The Permittee is proposing to install a new 100 MMBtu/hr boiler in 2003 capable of burning natural gas and distillate fuel oil. It is subject to New Source Performance Standards, subpart Dc and will replace a boiler that is capable of burning #6 fuel oil, will have a 0.3 percent fuel sulfur content limit and annual usage limits on the amount of distillate oil allowed to be burned.

PERMIT ACTION 002:

This permit amendment is an MPCA-initiated amendment under Minn. R. 7007.1600, subp. 1(D). It incorporates process throughput limits for Group 001 Spray Dryers imposed on the facility under the performance testing rules (Minn. R. 7017.2025, subp. 3).

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

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
OPERATIONAL REQUIREMENTS	hdr
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
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)
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)
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
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
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 enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
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. Rs. 7017.2030, subp. 1-4; 7017.2018 and 7017.2035, subp. 1-2
Limits set 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. 7017.2025
MONITORING REQUIREMENTS	hdr
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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, 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)
MODELING REQUIREMENTS	hdr
See Table B for modeling submittal	hdr
RECORDKEEPING	hdr
Record keeping: 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)
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)
REPORTING/SUBMITTALS	hdr
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
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
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)
Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
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

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: GP 001 Spray Dryers

- Associated Items:**
- CE 001 Centrifugal Collector - Medium Efficiency
 - CE 002 Centrifugal Collector - Medium Efficiency
 - CE 003 Centrifugal Collector - Medium Efficiency
 - CE 004 Centrifugal Collector - Medium Efficiency
 - EU 003 Spray Dryer 1
 - EU 004 Spray Dryer 2
 - EU 005 Spray Dryer 3
 - EU 006 Spray Dryer 4
 - SV 004 Spray Dryer 1
 - SV 005 Spray Dryer 2
 - SV 006 Spray Dryer 3
 - SV 007 Spray Dryer 4

What to do	Why to do it
LIMITS	hdr
Total Particulate Matter: less than or equal to 0.094 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. Limit applies to each dryer individually. (Recent performance test showed 0.083 gr/dscf.)	Minn. R. 7011.0610, subp. 1(A)(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. Limit applies to each dryer individually.	Minn. R. 7011.0610, subp. 1(A)(2)
Process Throughput: less than or equal to 2750 lbs/hour using 8-hour Block Average . This limit applies to each spray dryer individually.	Minn. R. 7017.2025, subp. 3
OTHER REQUIREMENTS	hdr
Visible Emissions: The Permittee shall check CE001, CE002, CE003 and CE004's stacks (SV004, SV005, SV006 and SV007) for any visible emissions once each day of operation during daylight hours.	Minn. R. 7007.0800, subp. 4(B)
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the cyclones or any of their components are found during the inspections to need repair. Corrective actions shall 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 cyclones. The Permittee shall keep a record of the type and date of any corrective action taken for CE001, CE002, CE003 or CE004.	Minn. R. 7007.0800, subp. 4, 5 and 14
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturer's specifications, the Permittee shall inspect CE001, CE002, CE003 and CE004's components. The Permittee shall maintain a written record of these inspections.	Minn. R 7007.0800, subp. 4, 5 and 14
MONITORING, RECORDKEEPING AND REPORTING	hdr
Hourly recordkeeping: A written hourly log shall be maintained for each dryer while it is operational that includes the recorded temperature and the operating pressure of the feed pump. The operating temperature is to be recorded on a 24-hr chart recorder for each dryer.	Minn. R. 7007.0800, subp. 4
Calculation Method for spray dryers: OC (gal/hr) x 0.5 wt% solids x 10.1 lb/gal = Process Throughput rate (lb/hr) where: OC = Operating capacity of pump in gallons/hour (8-hr block average)	Minn. R. 7007.0800, subp. 5
PERFORMANCE TESTING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

<p>Performance Test: due 1095 days after permit issuance on one representative unit that has not been tested in the previous 3 years to measure total particulate matter emissions. The tests shall be conducted at an interval not to exceed 36 months between test dates.</p> <p>Limits set as result of this test apply until to all units in group individually until new limits are set following formal review of a performance test.</p>	<p>Minn. R. 7017.2020, subp.1</p>
<p>Performance Test: due 1095 days after permit issuance for Opacity.</p>	<p>Minn. R. 7017.0610, subp. 1(A)(2)</p>
<p>Performance Test: due 1095 days after permit issuance to measure VOC emission factor from spray dryers on one representative unit.</p> <p>Information from this test will apply to all units in the group individually.</p>	<p>Minn. R.</p>
<p>Performance Test Notifications and Submittals;</p> <p>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 day before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 day after each Performance Test. The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.</p>	<p>Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2</p>
<p>Operating and/or production limits will be placed on emission units based on operating conditions during performance testing. Limits set as a result of a performance test (conducted before or after permit issuance) apply until new operating/production limits are set following formal review of a performance test as specified by Minn. R. 7017.2025.</p>	<p>Minn. R. 7017.2025, subp. 3</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: GP 002 Drum Dryers

- Associated Items:** CE 007 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 CE 008 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 CE 009 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 CE 010 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 EU 011 Drum Dryer 1
 EU 012 Drum Dryer 2
 EU 013 Drum Dryer 3: fluid bed
 EU 014 Drum Dryer 4
 SV 008 Drum Dryer 1
 SV 009 Drum Dryer 2
 SV 010 Drum Dryer 3
 SV 011 Drum Dryer 4

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735 (potential to emit is 0.067 gr/dscf). Limit applies to each dryer individually.	Minn. R. 7011.0610, subp. 1(A)(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. Limit applies to each dryer individually.	Minn. R. 7011.0610, subp. 1(A)(2)
OTHER REQUIREMENTS	hdr
Visible Emissions: The Permittee shall check CE007, CE008, CE009 and CE010's stacks (SV008, SV009, SV010 and SV011) for any visible emissions once each day of operation during daylight hours.	Minn. R. 7007.0800, subp. 4(B)
<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"> - visible emissions are observed; - the baghouses or any of their components are found during the inspections to need repair. <p>Corrective actions shall 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 baghouses. The Permittee shall keep a record of the type and date of any corrective action taken for CE007, CE008, CE009 or CE010.</p>	Minn. R. 7007.0800, subp. 4, 5 and 14
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturer's specifications, the Permittee shall inspect CE007, CE008, CE009 and CE010's components. The Permittee shall maintain a written record of these inspections.	Minn. R 7007.0800, subp. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: GP 003 Caterpillar Generators

Associated Items: EU 016 Diesel Generator

EU 017 Diesel Generator

SV 022 Caterpillar Generator 1

SV 023 Caterpillar Generator 2

What to do	Why to do it
EMISSION LIMITS	hdr
Nitrogen Oxides: less than or equal to 58.7 lbs/hour	Title I Condition: To remain a nonmajor modification under 40 CFR Section 52.21
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
OTHER LIMITS	hdr
Operating Hours: less than or equal to 625 hours/year using 12-month Rolling Sum calculated by the 15th day of the following month..	Title I Condition: To remain a nonmajor modification under 40 CFR Section 52.21
Sulfur Content of Fuel: less than or equal to 0.15 percent by weight for liquid fuels.	Minn. R. 7007.0800, subp. 2, Minn. R. 7011.2300, subp. 2
RECORDKEEPING	hdr
Sulfur Content of Fuel: Sample and analyze the fuel oil storage tank for sulfur content after each delivery or obtain a fuel oil supplier certification that the fuel contains less than 0.15% sulfur by weight.	Minn. R. 7007.0800, subp. 2
PERFORMANCE TESTING	hdr
Performance Test: due 1095 days after permit issuance to measure NOx emissions.	Minn. R. 7017.2020, subp. 1
Performance Test Notifications and Submittals; 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 day before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 day 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. 7017.2018 and Minn. R. 7017.2035, subp. 1-2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: GP 004 Whey Handling and Bagging

- Associated Items:**
- CE 005 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 006 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 011 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 012 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 013 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 014 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 015 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 016 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 - EU 009 Bagging 1
 - EU 010 Bagging 2
 - EU 015 PowderPak (bagging)
 - EU 019 Surge Bin
 - EU 020 Whey Bin #1
 - EU 021 Whey Bin #2
 - EU 022 Whey Bin #3
 - EU 023 Whey Bin #4
 - EU 024 Whey Bin #5
 - EU 025 Whey Bin #6
 - SV 012 PowderPak (Bagging)
 - SV 013 Whey Bin 1
 - SV 014 Whey Bin 5 & 6
 - SV 015 Whey Bin 2
 - SV 016 Whey Bin 3
 - SV 017 Whey Bin 4
 - SV 018 Bagging Unit 1
 - SV 019 Bagging Unit 2
 - SV 021 Surge Bin

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
OTHER REQUIREMENTS	hdr
Visible Emissions: The Permittee shall check CE005, CE006, CE011, CE012, CE013, CE014, CE015, CE016 and CE017's stacks (SV012, SV013, SV014, SV015, SV016, SV017, SV018, SV019 and SV021) for any visible emissions once each day of operation during daylight hours.	Minn. R. 7007.0800, subp. 4(B)
<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"> - visible emissions are observed; - the baghouses or any of their components are found during the inspections to need repair. <p>Corrective actions shall 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 baghouses. The Permittee shall keep a record of the type and date of any corrective action taken for CE005, CE006, CE011, CE012, CE013, CE014, CE015, CE016 and CE017.</p>	Minn. R. 7007.0800, subp. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturer's specifications, the Permittee shall inspect CE005, CE006, CE011, CE012, CE013, CE014, CE015, CE016 and CE017's components. The Permittee shall maintain a written record of these inspections.	Minn. R 7007.0800, subp. 4, 5 and 14
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TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: SV 003 Fairbanks Generator

Associated Items: EU 008 Diesel Generator

What to do	Why to do it
EMISSION LIMITS	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
OTHER REQUIREMENTS	hdr
<p>Parameters used in Modeling: The stack heights, air flow rates, and exhaust gas temperature used in the screen modeling performed to demonstrate compliance with NOx ambient air quality standards are listed in Appendix B of this permit. No modifications to this emission unit can be made unless the stack parameters are consistent with those in Appendix B.</p> <p>The Permittee must submit to the Agency for approval any revisions of these parameters and must wait for written approval before making such changes. The information submitted must include, at a minimum, the height and diameter of the stack, the velocity and temperature of the gas emitted, and the maximum NOx emission rate. The plume dispersion characteristics after the proposed revision must be equivalent to or better than the dispersion characteristics used in the SCREEN Model performed to determine the parameters currently listed in Appendix B.</p>	Minn. R. 7009.0200 (emissions modeled demonstrate compliance with NOx ambient standards). This is a state-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.
Stack height extension: Minimum of 33.5 ft above ground level.	Minn. R. 7009.0020
Sulfur Content of Fuel: less than or equal to 0.3 percent by weight	Minn. R. 7007.0800, subp. 2
<p>Equipment Installation: due 150 days after permit issuance : The stack must meet the parameters listed in Appendix B after equipment installation.</p> <p>OR</p> <p>As an alternative, the Permittee may complete full dispersion modeling of NOx emissions from the entire source, demonstrating that the facility does not contribute to modeled violations of NOx ambient standards.</p>	Minn. R. 7009.0200
RECORDKEEPING and NOTIFICATIONS	hdr
Sulfur Content of Fuel: Sample and analyze the fuel oil storage tank for sulfur content after each delivery or obtain a fuel oil supplier certification that the fuel contains less than 0.3% sulfur by weight.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: EU 002 Boiler 2 (Central, 1964-2003, now West)

Associated Items: SV 001 West Boiler

What to do	Why to do it
LIMIT	hdr
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (potential to emit is 0.11 lb/million Btu based on equipment design).	Minn. R. 7011.0510, subp. 1
Sulfur Dioxide: less than or equal to 1.6 lbs/million Btu heat input while burning liquid fuels (potential to emit is 1.57 lb/million Btu based upon equipment design).	Minn. R. 7011.0510, subp. 1
Sulfur Content of Fuel: less than or equal to 1.48 percent by weight for liquid fuels.	Minn. R. 7007.0800, subp. 2
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
RECORDKEEPING	hdr
Sulfur Content of Fuel: Sample and analyze the fuel oil storage tank for sulfur content after each delivery or obtain a fuel oil supplier certification that the fuel contains less than 1.48% sulfur by weight.	Minn. R. 7007.0800, subp. 2
Label Boiler: Within 60 days of permit issuance, the Permittee shall clearly label the boiler with the emission unit number as stated in this permit. For this boiler, the label should read EU 002.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: EU 007 Boiler (East, 1978-2003)

Associated Items: SV 002 East Boiler

What to do	Why to do it
LIMIT	hdr
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (potential to emit is 0.11 lb/million Btu based upon equipment design).	Minn. R. 7011.0510, subp. 1
Sulfur Dioxide: less than or equal to 1.6 lbs/million Btu heat input while burning liquid fuels (potential to emit is 1.57 lb/million Btu based upon equipment design).	Minn. R. 7011.0510, subp. 1
Sulfur Content of Fuel: less than or equal to 1.48 percent by weight for liquid fuels.	Minn. R. 7007.0800, subp. 2
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
RECORDKEEPING	hdr
Sulfur Content of Fuel: Sample and analyze the fuel oil storage tank for sulfur content after each delivery or obtain a fuel oil supplier certification that the fuel contains less than 1.48% sulfur by weight.	Minn. R. 7007.0800, subp. 2
Label Boiler: Within 60 days of permit issuance, the Permittee shall clearly label the boiler with the emission unit number as stated in this permit. For this boiler, the label should read EU 007.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: EU 008 Diesel Generator**Associated Items:** SV 003 Fairbanks Generator

What to do	Why to do it
LIMIT	hdr
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight for liquid fuels.	Minn. R. 7007.0800, subp. 2
RECORDKEEPING	hdr
Sulfur Content of Fuel: Sample and analyze the fuel oil storage tank for sulfur content after each delivery or obtain a fuel oil supplier certification that the fuel contains less than 0.5% sulfur by weight.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

Subject Item: EU 018 Boiler 1 (East, 2003)

Associated Items: SV 002 East Boiler

What to do	Why to do it
EMISSION LIMITS	hdr
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input	40 CFR Section 60.42c(d); 40 CFR Section 60.42c(h)(1); Minn. R. 7011.0570
Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one 6-minute period per hour of not more than 27 percent opacity. This limit does not apply during periods of startup, shutdown, or malfunction.	40 CFR Section 60.43c(c); 40 CFR Section 60.43c(d); Minn. R. 7011.0570
OPERATING LIMITS/REQUIREMENTS	hdr
Fuel Usage: less than or equal to 1500000 gallons/year of distillate fuel oil based on a 12-month rolling sum.	Title I Condition: To avoid classification as a major modification under 40 CFR Section 52.21
Sulfur Content of Fuel: less than or equal to 0.3 percent by weight , based on certification by fuel supplier.	Minn. R. 7007.0800, subp. 2
The fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction.	40 CFR Section 60.42c(i)
Label Boiler: Within 60 days of permit issuance, the Permittee shall clearly label the boiler with the emission unit number as stated in this permit. For this boiler, the label should read EU 018.	Minn. R. 7007.0800, subp. 2
RECORDKEEPING	hdr
Recordkeeping: For each shipment of fuel oil, the Permittee shall obtain and maintain a copy of the fuel supplier's certification, which shall include the name of the oil supplier, and a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Section 60.41c.	40 CFR Section 60.48c(f)(1); Minn. R. 7011.0570
Monthly Recordkeeping: Record and maintain records of the amounts of each fuel combusted on a monthly basis. These records may consist of purchase records or receipts.	40 CFR Section 60.13(i) and February 20, 1992, February 22, 1003 and June 25, 2002 EPA memoranda to meet the requirements of 40 CFR Section 60.48c(g) and (i); Minn. R. 7011. 0570
Monthly Recordkeeping: By the 15th day of each month, calculate and record the following: 1. the total quantity of fuel oil combusted in the boiler during the previous month 2. the total quantity of fuel oil combusted in the boiler during the previous 12-month period by summing the monthly fuel oil usage for the previous 12 months.	Title I Condition: To avoid classification as a major modification under 40 CFR Section 52.21
Recordkeeping: Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the facility including; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	40 CFR Section 60.7(b), Minn. R. 7019.0100, subp. 1
Recordkeeping: Maintain a file of all measurements, maintenance, reports and records for at least two years.	40 CFR Section 60.7(f); Minn. R. 7019.0100, subp. 1
REPORTING	hdr
PERFORMANCE TESTING	hdr
Initial Performance Test: due 180 days after Initial Startup of the boiler, not to exceed 60 days after achieving maximum operating capacity, to measure opacity.	60.45c(a); 60.8(a)
Performance Test Notifications and Submittals: 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	Minn. R. 7017.2030, subp. 1 - 4; Minn. R. 7017.2035, subp. 1and 2 and Minn. R. 7017.2018
Opacity Compliance: Demonstrate compliance with opacity standards using Reference Method 9.	40 CFR Section 60.11; Minn. R. 7017.2015
NOTIFICATIONS	hdr
Notification of any physical or operational change which increases emission rate: due 60 days (or as soon as practical) before the change is commenced within 180 days of completion of any physical or operational change subject to the control measures specified in 60.14(a), compliance with all applicable standards must be achieved.	40 CFR Section 60.7(a)(4); Minn. R. 7019.0100, subp. 1
Notification of Anticipated Date for Conducting Opacity Observations: due 30 day prior to observation date	40 CFR Section 60.7(a)(4); Minn. R. 7019.0100, subp. 1
No owner or operator shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.	40 CFR Section 60.12

TABLE B: SUBMITTALS

06/30/04

Facility Name: Bongards' Creameries
Permit Number: 01900001 - 002

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:

Permit Technical Advisor
Permit Section
Air Quality 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:

Supervisor
Compliance Determination Unit
Air Quality 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

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Computer Dispersion Modeling Information	due 1096 days after 11/07/2003 . Submit modeling data as specified in MPCA guidance for Modeling Information Requests. This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup	EU018
Notification of the Date Construction Began	due 30 days after Start Of Construction. Submit the name and number of each unit and the date construction of each unit began.	EU018
Notification	due 15 days after Equipment Installation (modified stack) or completion of Dispersion Modeling.	SV003

TABLE B: RECURRENT SUBMITTALS

06/30/04

Facility Name: Bongards' Creameries

Permit Number: 01900001 - 002

What to send	When to send	Portion of Facility Affected
Quarterly Report	due 30 days after end of each calendar quarter following Initial Performance Test. Quarterly reports shall include records of fuel supplier certifications (including the name of the fuel supplier and a statement from the fuel supplier that the fuel oil complies with the specifications under the definition of distillate fuel oil) and a certified statement that the records represent all fuel combusted.	EU018
Report	due 30 days after end of each calendar half-year following permit issuance . The report shall be submitted to the U.S. EPA, and shall include the following: - the calendar dates covered in the reporting period - records of fuel oil supplier certifications - certified statement signed by the owner or operator stating that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the reporting period.	EU018
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 11/07/2003 . 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. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 11/07/2003 (for the previous calendar year). To 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 A: Modeling Parameters

Facility Name: Bongards' Creameries

Permit Number: 01900001-002

Any physical change or change in a method of operation must result in plume dispersion characteristics equivalent to or better than the plume dispersion characteristics modeled using the parameters below. Revision of any of these parameters may require a permit amendment.

Table A – Modeled Parameters – Fairbanks Generator

SV ID No.	Modeled Stack Height (feet)	Modeled Stack Diameter (feet)	Modeled Stack Temperature (°F)	Modeled Stack Air Flow (acfm)
003	33.5	1.3	474.8	1592

Appendix B: Insignificant Activities Required to be Listed

Facility Name: Bongards' Creameries

Permit Number: 01900001-002

Insignificant Activities and Applicable Requirements

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(D)	Processing operations:	
	<p>2. Equipment venting particulate matter (PM) or particulate matter less than 10 microns (PM-10) inside a building, provided that emissions from the equipment are:</p> <p>a). filtered through an air cleaning system; and</p> <p>b). vented inside of the building 100% of the time.</p> <ul style="list-style-type: none"> • Metal shop with milling and lathing operations, vented inside 100% of the time 	Minn. R. 7011.0710/0715
3(G)	<p>Emissions from a laboratory, as defined in the subpart.</p> <ul style="list-style-type: none"> • Small QA/QC laboratory 	Minn. R. 7011.0510/0515 +Minn. R. 7011.0610 + Minn. R. 7011.0710/0715
3(H)	Miscellaneous:	
	<p>1. total usage of less than 200 gallons of VOC (including hazardous air pollutant-containing VOC) combined in any consecutive 12 months period at a stationary source;</p> <ul style="list-style-type: none"> • Several Mineral Spirits booths, total usage less than 200 gallons per 12-month period. 	Minn. R. 7011.0710/0715
	<p>4. brazing, soldering or welding equipment;</p> <ul style="list-style-type: none"> • Welding equipment 	Minn. R. 7011.0610; Minn. R. 7011.0710/0715

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
l)	<p>Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than:</p> <ol style="list-style-type: none"> 1. 4,000 lbs/year of carbon monoxide; and 2. 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone. <ul style="list-style-type: none"> • Space heaters in generator building, water heaters and space heaters in the retail store and main office, all of which have potential emissions below these thresholds. • Two tanks for distillate oil storage: 1,175,000 gallons and 73,000 gallosn, potential VOC emissions < 4 lb/yr each 	<p>Minn. R. 7011.2300</p> <p>Minn. R. 7011.0715; Minn. R. 7011.0105; Minn. R. 7011.0150</p>
4	<p>Insignificant activities required to be listed in a part 70 application. If a facility is applying for a part 70 permit, emissions units with emissions less than all the following limits but not included in subpart 2 must be listed in a part 70 permit application:</p> <ol style="list-style-type: none"> A. potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide; B. potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs; and C. for hazardous air pollutants, emissions units with..... <ul style="list-style-type: none"> • Individual gas-fired heaters, each of which has potential emissions below the lb/hour thresholds 	<p>Minn. R. 7011.0510/7011.0610/7011.0715</p> <p>Minn. R. 7011.0715; Minn. R. 7011.0105; Minn. R. 7011.0150</p>

**TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT AMENDMENTS**

This technical support document is for all the interested parties of the permit amendments. The purpose of this document is to set forth the legal and factual basis for the permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Permits Being Amended:

Permit No.	Owner/Operator Address (if different than facility)	Facility Address
03700043-002	Ms. Rebecca Flood 230 E 5 th St. St. Paul, MN 55101-1626	Seneca Wastewater Treatment Plant 3750 Plant Road Eagan, Dakota County, MN 55122
01900001-002	Mr. Roger Engelmann Bongards' Creameries 13200 County Road 51 Bongards, MN 55368	Bongards' Creameries 13200 County Road 51 Bongards, MN 55368
13100005-002	Mr. Ron Keller Northfield Acquisition Company 1150 Sheldahl Road Northfield, MN 55057	Northfield Acquisition Company East and West Buildings 1150 Sheldahl Road and 805 North Hwy 3 Northfield, MN 55057-0170

1.2 Reason for Permit Actions

These permit amendments are MPCA initiated major amendments under Minn. R. 7007.1600, subp. 1(D) – mandatory reopenings that are needed in order to assure compliance with applicable requirements.

The amendments incorporate new or revised limits into the referenced permits. The limits have been imposed through performance testing under Minn. R. 7017.2025, subp. 3 and are already in affect. The permits must be reopened in order to reflect the revised limits.

These amendments are for all MPCA letters sent between September 19, 2003 and January 8, 2004 that set new limits in Part 70 permits based on performance testing under Minn. R. ch. 7017.

1.3 Description of the Activities Allowed By This Permit Action

For the following permits, additional changes were also made at this time. All changes meet the requirements of Minn. R. 7007.1600, subp. 2 (B) or 2(C) – alterations or modifications to the permitted facility that result in or have the potential to result in significant alteration of the nature or quantity of regulated air pollutants to be emitted by the permittee OR information previously unavailable to the MPCA that shows that the terms and conditions of the permit do not accurately represent the actual circumstances relating to the permitted facility.

Permit No.	Permit Change
03700043-002	GP001: In the Title V permit the minimum temperature to be maintained in the incinerators was reduced from 1550°F to 1200°F to minimize the use of fuel. The requirement for the Permittee to submit a THC monitoring report was intended to show THC concentration trends when operating under the new combustion chamber and afterburner temperature requirements as a surrogate for odor. After one year following permit issuance the Permittee notified MPCA that the monitoring period had ended and arranged a meeting with MPCA staff to discuss the results of the THC monitoring reports. The Permittee reported that although the monitoring requirements had been fulfilled, the lower operating temperatures on the after burners had not been achieved as the burner temperature could not be adjusted downward. The Permittee is planning to install replacement burners on the afterburners or experiment more with turning one or two of the current burners off to achieve the lower temperatures and they have agreed to submit one more years worth of THC monitoring data once the new burners are installed and the lower temperatures have been achieved to ensure that there is not the potential for significant odor increases.

1.4. Change in Emissions

There are no changes in emissions associated with the permit reopenings.

1.5 Comments Received on Seneca (Included in Attachment 1 to this TSD): from Permittee

1. Clarify the Permit Type on the cover page as regards New Source Review.
2. The existing emission limit of 1.30 lb/ton dry sludge should remain (p. A-4 of permit). This is an emission limit.
3. The associated process throughput rate, increased 110% in accordance with the performance test rule is 1.48 dry tons/hr based on a 24-hr block average. This limit will be added on p. A-6 of the permit.
4. Deleted a duplicative paragraph on p. A- 8 of the permit.
5. Incorporated specific pressure drop minimum for venturi scrubber as measured during the most recent performance test. Set limit of \leq 15 inches of water column.
6. Incorporated specific water flow limit for wet scrubber system as measured during the most recent performance test. Set limit of \leq 565.2 gallons per minute using a 1-hr block average. (This is 10% less than the average tested flow rate of 628 gallons/minute).

2. Regulatory and/or Statutory Basis

The following table shows which permit limits were revised in each permit, as well as the date of the MPCA letter that sets the new limits. See Attachments 1-4 to this TSD for a copy of the letters.

Permit No.	Level*	Old/New Limits	Basis
Seneca Wastewater Treatment Plant 03700043-002	GP001	<p>Old: Performance Tests: Incinerator 1(EU001) will be limited to the average sludge feed rate demonstrated during the most recent performance test conducted for compliance purposes. Incinerator 2 (EU002) will be limited to the average sludge feed rate demonstrated during the most recent performance test conducted for compliance purposes. Where test results are less than or equal to 80 percent of the value of the applicable emission limit for all of the air pollutants that were required to be tested, the new limit shall be set at 110 percent of the tested rate except as otherwise provided in Minn. R. 7017.2025, subp. 3a(B).</p> <p>New: Performance Tests: Incinerator 1(EU001) will be limited to the average sludge feed rate demonstrated during the most recent performance test conducted for compliance purposes. Incinerator 2 (EU002) will be limited to the average sludge feed rate demonstrated during the most recent performance test conducted for compliance purposes as shown in the following requirement. Where test results are less than or equal to 80 percent of the value of the applicable emission limit for all of the air pollutants that were required to be tested, the new limit shall be set at 110 percent of the tested rate except as otherwise provided in Minn. R. 7017.2025, subp. 3a(B).</p> <p>New (Added to permit after above requirement): Process Throughput: less than or equal to 1.48 tons/hour using 24-hour Block Average is the average sludge feed rate limit in dry tons per hour for Incinerator 2 (EU002) as demonstrated during the most recent MPCA-approved performance test demonstrating compliance. (12/5/02)</p>	December 19, 2003 letter from MPCA implementing Minn. R. 7017.2025, subp. 3.

<p>Seneca Wastewater Treatment Plant 03700043-002</p>	<p>CE004</p>	<p>Old: Pressure Drop: greater than or equal to 30 percent below the average scrubber pressure drop measured during the most recent performance test showing compliance for each venturi scrubber with a minimum pressure drop not less than 15 inches of water column using a 15-minute block average</p> <p>New: Pressure Drop: less than or equal to 15 inches of water column using a 15-minute block average as determined during the December 5, 2002 performance test. Pressure Drop shall be greater than or equal to 30 percent below the average scrubber pressure drop measured during the most recent performance test showing compliance for each venturi scrubber with a minimum pressure drop not less than 15 inches of water column.</p>	<p>Control Equipment parameters associated with December 19, 2003 letter from MPCA implementing Minn. R. 7017.2025, subp. 3.</p>
<p>Seneca Wastewater Treatment Plant 03700043-002</p>	<p>CE004</p>	<p>Old: Water flow rate: greater than or equal to 10 percent below the average water flow rate measured during the most recent performance test showing compliance for each wet scrubber system (venturi flow plus the subcooler flow) but not less than a minimum water flow rate of 380 gallons per minute using a 1-hour block average.</p> <p>New: Water flow rate: greater than or equal to 565.2 gallons/minute using 1-Hour Average as measured during the most recent MPCA-approved performance test dated December 5, 2002. Water flow rate shall be greater than or equal to 10 percent below the average water flow rate measured during the most recent performance test showing compliance for each wet scrubber system (venturi flow plus the subcooler flow) but not less than a minimum water flow rate of 380 gallons per minute using a 1-hour block average.</p>	<p>Control Equipment parameters associated with December 19, 2003 letter from MPCA implementing Minn. R. 7017.2025, subp. 3.</p>
<p>Bongards' Creameries 01900001-002</p>	<p>GP001</p>	<p>Old: Process Throughput: less than or equal to 3787 lbs/hour using 8-hour block average. This limit applies to each spray dryer individually.</p> <p>New: Process Throughput: less than or equal to 2750 lbs/hour using 8-hour block average. This limit applies to each spray dryer individually.</p>	<p>January 8, 2004 letter from MPCA implementing Minn. R. 7017.2025, subp. 3.</p>

Northfield Acquisition Co. 13100005-002	CE002	Old: Temperature \geq 645 °F New: Temperature \geq 684.5 °F	October 28, 2003 letter from MPCA implementing Minn. R. 7017.2025, subp. 3.
Northfield Acquisition Co. 13100005-002	CE002	Old: Testing Frequency Plan: due 60 days after Initial Performance Test for VOC destruction efficiency and VOC carryover... New: Performance Testing: due every 60 months after 5/20/03.	October 28, 2003 letter from MPCA implementing Minn. R. 7017.2020, subp. 1.

*Level -- EU = emission unit, GP = group, TF = total facility, SV = stack/vent, CE = control equipment

4. Contact

MCPA Staff Contact for these Permit Actions: Bonnie J. Nelson

Attachments

- 1 Seneca WWTP: MPCA Performance Test Letters with CD-01 forms reflecting changes made
- 2 Bongards' Creameries: MPCA Performance Test Letters with CD-01 forms reflecting changes made
- 3 Northfield Acquisition: MPCA Performance Test Letters with CD-01 forms reflecting changes made

Attachment 1

Attachment 2

Attachment 3