

**AIR EMISSION PERMIT NO. 07300016- 001
IS ISSUED TO**

Associated Milk Producers, Inc.
315 North Broadway
New Ulm, Minnesota 56073

FOR

Associated Milk Producers Inc - Dawson
East Highway 212
Dawson, Lac Qui Parle County, Minnesota 56232

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

Permit Type	Application Date
Total Facility Operating Permit	September 1, 1995
Major Amendment Application	February 25, 1997

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: Part 70/Limits to avoid NSR
Issue Date: August 15, 2000
Expiration: August 15, 2005
All Title I Conditions do not expire.

Toni Volkmeier

Rodney E. Massey
Director
North/South Districts

for Karen A. Studders
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 facility produces and packages natural cheeses and dries and packages concentrated cheese whey. The facility consists of the following operations/equipment producing air emissions:

- Two boilers – one combusting natural gas only, one combusting natural gas with fuel oil as back-up.
- Two emergency generators (one is insignificant)
- A canning line (insignificant)
- A whey drying system consisting of a main dryer and secondary dryer, product collection cyclones, and a wet scrubber controlling particulate matter.
- A whey powder collection surge bin with a baghouse controlling particulate matter.
- A wastewater treatment operation (insignificant)

The facility has accepted a limit on the sulfur content of the fuel oil combusted, to remain a non-major source under federal New Source Review/Prevention of Significant Deterioration regulations. The facility is a major source under the Part 70 permit program.

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson
 Permit Number: 07300016 - 001

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
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
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)
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
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, 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)
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A or B.	Minn. R. ch. 7017
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
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
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

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

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
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
Application for Permit Reissuance: due 180 days before expiration of existing permit.	Minn. R. 7007.0400, subp. 3
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)
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)
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
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
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)
Emissions Inventory Report: due April 1 of each year. 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

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: SV 006 Atomizer Dryer Stack

Associated Items: EU 006 Niro Atomizer Dryer

EU 010 Product collection cyclone system

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 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. 7011.0610, 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.	Minn. R. 7011.0610, subp. 1(A)(2)
TESTING AND MONITORING REQUIREMENTS	hdr
Performance Test: due before 10/31/2000 to measure total particulate matter emissions.	Minn. R. 7007.0800, subp. 4(B) [Testing for Minn. R, 7011.0610, subp. 1(A)(1) limit]
Performance Test Notifications and Submittals: 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	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: SV 007 Fluidized Bed Dryer Stack

Associated Items: EU 007 Niro Fluidized Bed Dryer

EU 011 Product collection cyclone

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 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)
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months starting 02/28/2004 to measure total particulate matter emissions. The first test is due on or before February 28, 2004, then every 60 months thereafter.	Minn. R. 7007.0800, subp. 4(B) [Testing for Minn. R, 7011.0715, subp. 1(A) limit]
<p>Performance Test Notifications and Submittals:</p> <p>Performance Test Notification (written): due 30 days before each Performance Test</p> <p>Performance Test Plan: due 30 days before each Performance Test</p> <p>Performance Test Pre-test Meeting: due 7 days before each Performance Test</p> <p>Performance Test Report: due 45 days after each Performance Test</p> <p>Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p>	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2
CONTROL REQUIREMENTS (CE001 - wet scrubber)	hdr
The Permittee shall operate the control equipment (CE001 - wet scrubber) any time the associated emission units are in operation.	Minn. R. 7007.0800, subp. 2
Total Particulate Matter: greater than or equal to 90 percent control efficiency	Minn. R. 7011.0070, subp. 1
Wet Scrubber Pressure Drop: greater than or equal to 5 inches of water column and less than or equal to 12 inches of water column	Minn. R. 7011.0075, subp. 1
Wet Scrubber Water flow rate: greater than or equal to 2 inches of water column and less than or equal to 7 inches of water column	Minn. R. 7011.0075, subp. 1
<p>Once each operating day, read and record the pressure drop and the water flow rate of the scrubber.</p> <p>If the recorded pressure drop or flow rate is outside the required operating range, the Permittee shall follow the Operating and Maintenance Plan for the equipment and begin corrective actions as soon as possible (within 24 hours) to correct the problem. The Permittee shall keep a record of the corrective actions taken.</p>	Minn. R. 7011.0080
<p>Inspection and Maintenance of Control Equipment: The Permittee shall conduct all necessary maintenance and make all necessary attempts to keep the pollution control equipment in proper operating condition. The Permittee shall operate and maintain the control equipment according to the manufacturer's specifications or the Operation and Maintenance Plan.</p> <p>The Permittee shall inspect the control equipment according to the manufacturer's specifications or the Operation and Maintenance Plan. The Permittee shall maintain a written record of each inspection and any action resulting from the inspection.</p>	Minn. R. 7011.0075, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: SV 008 Surge Bin Baghouse Stack

Associated Items: EU 008 Surge Bin

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 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)
CONTROL REQUIREMENTS (CE002)	hdr
The Permittee shall operate the control equipment (CE002 - fabric filter) any time the associated emission unit is in operation.	Minn. R. 7007.0800, subp. 2
Total Particulate Matter: greater than or equal to 99 percent control efficiency	Minn. R. 7011.0070, subp. 1
Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Minn. R. 7011.0070
Pressure Drop: greater than or equal to 1 inches of water column and less than or equal to 8 inches of water column	Minn. R. 7011.0075, subp. 1
Once each operating day, read and record the pressure drop across the baghouse. If the recorded pressure drop is outside the required operating range, the Permittee shall follow the Operating and Maintenance Plan and begin corrective actions as soon as possible (within 24 hours) to correct the problem. The Permittee shall keep a record of the corrective actions taken.	Minn. R. 7011.0080
Inspection and Maintenance of Control Equipment: The Permittee shall conduct all necessary maintenance and make all necessary attempts to keep the pollution control equipment in proper operating condition. The Permittee shall operate and maintain the control equipment according to the manufacturer's specifications or the Operation and Maintenance Plan. The Permittee shall inspect the control equipment according to the manufacturer's specifications or the Operation and Maintenance Plan. The Permittee shall maintain a written record of each inspection and any action resulting from the inspection.	Minn. R. 7011.0075, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: EU 001 Boiler #1

Associated Items: SV 001 Nebraska Boiler Stack

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (potential PM emissions of the unit while burning fuel oil is 0.261 lb/million Btu heat input)	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.	Minn. R. 7011.0515, subp. 2
OPERATING REQUIREMENTS	hdr
Fuel Burned: Limited to natural gas or fuel oil only	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: Maintain records of vendor certifications of sulfur content of each fuel oil shipment. Records should include date of shipment, name of fuel oil vendor, and sulfur content of shipment.	Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: EU 002 Boiler #2**Associated Items:** SV 002 Cleaver-Brooks Boiler Stack

What to do	Why to do it
Fuel Burned: Limited to natural gas only	Title I Condition: To avoid classification of the boiler as a major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Maintain records of the amount of fuel combusted during each month.	40 CFR Section 60.13(i) and 02/20/92 EPA memo, to meet requirements of 40 CFR Section 60.48c(g) & (i); Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: EU 003 Main Generator**Associated Items: SV 003 Main Generator Stack**

What to do	Why to do it
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input (potential to emit of the equipment is 0.29 lb SO ₂ /million Btu heat input)	Minn. R. 7011.2300, subp. 2
Opacity: less than or equal to 20 percent opacity once operating temperatures have been obtained	Minn. R. 7011.2300, subp. 1
Fuel Burned: Limited to diesel fuel only	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: TK 001 Fuel Oil

What to do	Why to do it
Maintain records showing the dimensions of the storage tank and an analysis showing the capacity.	40 CFR Section 60.116b(b); Minn. R. 7011.1520(C)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

Subject Item: FS 001 Gravel Road

What to do	Why to do it
Do not cause or permit the transporting of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Do not cause or permit a road or a driveway to be constructed, used, repaired, or demolished without applying all such reasonable measures as may be required to prevent particulate matter from becoming airborne. Take reasonable precautions to prevent the discharge of visible fugitive dust emissions beyond the lot line of the property on which the emissions originate. The commissioner may require such reasonable measures as may be necessary to prevent particulate matter from becoming airborne, including but not limited to, paving or frequent clearing of roads, driveways, and parking lots; application of dust-free surfaces; application of water; and the planting and maintenance of vegetative ground cover.	Minn. R. 7011.0150

TABLE B: SUBMITTALS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson
Permit Number: 07300016 - 001

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

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

What to send	When to send	Portion of Facility Affected
Computer Dispersion Modeling Protocol	due 1,096 days after Permit Issuance for PM10 and NOx. This protocol will describe the proposed modeling methodology and input data, in accordance with all requirements of 40 CFR pt. 51, App. W. The protocol will be based on projected operating conditions under the next permit term. This is a state only requirement and is not enforceable by the EPA Administrators or citizens under the Clean Air Act.	Total Facility
Computer Dispersion Modeling Results	due 1,462 days after Permit Issuance for PM10 and NOx. To be submitted after the MPCA has reviewed and approved the modeling protocol. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Testing Frequency Plan	due 60 days after Performance Test for total particulate matter. The plan shall specify a testing frequency based on the test data and MPCA guidance. Future performance tests based on 12, 36, or 60 month intervals, or as applicable, shall be required upon written approval of MPCA.	SV006

TABLE B: RECURRENT SUBMITTALS

08/15/00

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 001

What to send	When to send	Portion of Facility Affected
Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. 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 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, to both the Commissioner and the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604.	Total Facility

APPENDIX

Facility Name: Associated Milk Producers Inc - Dawson
 Permit Number: 07300016-001

Insignificant Activities and Applicable Requirements

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Likely Applicable Requirement
3(A)	Fuel use: space heaters fueled by, kerosene, natural gas, or propane. <ul style="list-style-type: none"> • 80,000 Btu/hour natural gas space heater 	Minn. R. 7011.0510/0515
3(G)	Emissions from a laboratory, as defined in the subpart. <ul style="list-style-type: none"> • Laboratory exhaust hood 	Minn. R. 7011.0710/0715
3(H)	Miscellaneous:	
	4. brazing, soldering or welding equipment;	Minn. R. 7011.0710/0715
3(I)	Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: <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"> • Canning line, PTE below all thresholds in 1 & 2 	Minn. R. 7011.0710/0715
	<ul style="list-style-type: none"> • Emergency generator (wastewater treatment plant), PTE below all thresholds in 1 & 2 	Minn. R. 7011.2300
	<ul style="list-style-type: none"> • Wastewater treatment plant, PTE below all thresholds in 1 & 2 	Minn. R. 7011.0710/0715
3(J)	Fugitive Emissions from roads and parking lots.	Minn. R. 7011.0150

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 07300016-001

This technical support document is for all parties interested in the permit. 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. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 2032/2022/2023)
Associated Milk Producers, Inc. 315 North Broadway P.O. Box 455 New Ulm, MN 56073 Paul Zattoni (507) 354-8295 Corporate Environmental Relations Associated Milk Producers, Inc. 315 North Broadway, P.O. Box 455 New Ulm, MN 56073	Associated Milk Producers, Inc. East Highway 212 Dawson, MN 56232 Lac Qui Parle County Joe Vaske Dawson Division Manager

1.2. Description of the facility

The facility produces and packages natural cheeses and dries and packages concentrated cheese whey.

Equipment at the facility consists of the following:

- Two boilers fired by natural gas (fuel oil is used as a backup fuel for one of the boilers). Combustion emissions are uncontrolled.
- Two emergency generators, one of which qualifies as “insignificant” under Minnesota rules. Combustion emissions are uncontrolled.
- A whey dryer which combusts natural gas or propane. Dried product is collected by a product collection cyclone. There is no control equipment on the dryer/collection system.
- A fluidized drying bed heated by steam. Product is collected by a product collection cyclone and particulate matter emissions are collected by a wet scrubber.
- A powder surge bin used to collect the dried whey. Particulate matter emissions from the surge bin are collected by a baghouse.
- A canning line in which cans are sterilized, filled, and sealed. This qualifies as an insignificant activity.

- A parts cleaner using mineral spirits.
- A wastewater treatment operation, which qualifies as an insignificant activity.

1.3 Description of any changes allowed with this permit issuance

No physical modifications are allowed by this permit action. The facility has never held a total facility permit. Since the actual facility emissions have never exceeded major source thresholds, the Permittee is accepting operating conditions through this permit that limit the total emissions to below major source thresholds.

1.4 Description of all amendments issued since the issuance of the last total facility permit and to be included in the Part 70 Permit.

Facility has never held a total facility permit. In 1997 a permit was issued authorizing installation and operation of a replacement natural gas fired boiler, subject to NSPS Subpart Dc. That permit authorized operation of the boiler on either natural gas or fuel oil, and included conditions requiring use of a continuous opacity monitor, stack testing, and sulfur dioxide emission calculation when the boiler operated on fuel oil. The boiler was never actually set up to combust fuel oil, and the company has since decided to run strictly on natural gas.

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

(see Attachment A for details)

	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Total HAPs tpy
Total Facility Limited Potential Emissions	173.7	172.7	14.5	140.6	52.5	5.2	0.27
Total Facility Actual Emissions (1997)	46.7	46.7	3.75	65.43	5.54	0.30	NR*

* Not required to report HAPs emissions

Table 2. Facility (TF) and Permit Classification

Classification	Major/Affected Source	*Synthetic Minor	*Minor
PSD (SO ₂ , NO _x)		X	
NAAR - NA			
Part 70 Permit Program (PM ₁₀ , SO ₂ , NO _x ,)	X		

* Refers to potential emissions that are less than those specified as major by 40 CFR 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

2. Regulatory Overview of Facility

New Source Review

Prior to this permit, the facility was a potential major source under New Source Review – Prevention of Significant Deterioration (PSD, 40 CFR § 52.21). All known modifications that have been made to the facility (the facility changed hands many times before AMPI purchased it) have been minor under PSD. AMPI applied for and received a synthetic minor permit to install a new boiler in 1997. Since the facility's actual emissions have never exceeded the major source thresholds, the Permittee can and chooses to accept synthetic minor limits at this time to maintain the non-major source classification of the facility.

Part 70 Permit Program

The facility is a major source under the federal operating permit program (40 CFR pt. 70). AMPI submitted a timely Title V application. The application was due on September 15, 1995, and was received by the MPCA on September 1, 1995.

New Source Performance Standards (NSPS)

- 40 CFR § 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60.40c(a) – The affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 100 million Btu per hour or less, but greater than or equal to 10 million Btu per hour.
Boiler No. 2 is subject to this standard.
- 40 CFR § 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)
40 CFR 60.110b(a) -- ... the affected facility to which this subpart applies is each storage vessels with a capacity greater than or equal to 40 cubic meters that is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.
Tank 1 is subject to this standard.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is not subject to any of the proposed or promulgated NESHAPs. No changes affecting the emissions of any of the listed HAPs are being made at the facility.

Minnesota State Rules

Several State Standards of Performance apply to portions of this facility and are included in the permit. These include:

- Minn. R. 7011.0070 to 7011.0080 – MN standards for operation of control equipment
- Minn. R. 7011.0500 to 7011.0553 – New Indirect Heating Fossil Fuel Burning Equipment

- Minn. R. 7011.0600 to 7011.0625 – New Direct Heating Fossil Fuel Burning Equipment
- Minn. R. 7011.0700 to 7011.0735 – Post 1969 Industrial Process Equipment
- Minn. R. 7011.2300 – Stationary Internal Combustion Engines

Table 3 Regulatory Overview

*Level	Applicable Regulations	Comments:
TF	Minn. R. 7007.0800, subp. 2	Requirement to model PM ₁₀ , NO _x , emissions (PTE greater than 100 tons per year)
EU001/ SV001	Minn. R. 7011.0515	Standards of Performance for New Indirect Heating Equipment
	Title I Condition	Synthetic minor limits set for SO ₂ , PM, PM ₁₀
EU002/ SV002	40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
EU003/ SV003	Minn. R. 7011.2300	Standards of Performance for Stationary Internal Combustion Engines
EU006/ SV006	Minn. R. 7011.0610	New Direct Heating Fossil Fuel Burning Equipment
EU007/ SV007; EU008/ SV008	Minn. R. 7011.0715	Post 1969 Industrial Process Equipment
CE001; CE002	Minn. R. 7011.0070	Control Equipment standards
TK001	40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

*TF = Total Facility; SV = Stack/Vent; EU = Emission Unit; CE = Control Equipment; TK = Tank

3. Technical Information

3.1 NSR Applicability

The facility was a major source under NSR, based on potential emissions. However, since the actual emissions have never exceeded 250 tpy for any regulated pollutant (as certified by the Permittee), the facility is eligible to accept synthetic minor limits.

The facility accepted a synthetic minor limit on NO_x and SO₂ emissions when installing Boiler No. 2 in 1997 (since the facility was a major source). The boiler was never set up to combust fuel oil, and the company has decided not to combust fuel oil in that boiler. Therefore, the requirement to install a COMS and calculate SO₂ emissions has been removed; potential emissions from natural gas alone are well below the PSD threshold for major modifications.

The facility accepted a limit on sulfur content in the fuel oil combusted in Boiler No.1. This limit brings the total facility potential to emit well below the 250 tpy threshold for PM, PM₁₀, and SO₂, the 3 pollutants of concern.

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. To achieve this objective, US EPA issued guidance (September 15, 1998, memorandum Periodic Monitoring Guidance for Title V Operating Permits Program) on periodic monitoring requirements for permitted sources.

Table 4 summarizes the periodic monitoring requirements.

Table 4 Periodic Monitoring Requirements

Emission Unit	Requirement	Additional Monitoring	Discussion
TK001	Keep records of tank dimensions and capacity	None	
SV001 EU001	PM and opacity limit under 7011.0515 Sulfur content of backup fuel (fuel oil)	Keep records of sulfur content from fuel oil vendors.	Potential PM emissions are approximately 12% of the applicable limit. As long as the fuel oil sulfur content is kept to 0.5%, it is unlikely that the limits will be exceeded
SV002 EU002	Fuel limited to natural gas	Keep records of quantity of fuel combusted on a monthly basis	Per EPA memo dated 2/20/92, requiring monthly (instead of daily) fuel usage records for Dc boilers burning natural gas only.
SV003 EU003 SV004 EU004	SO ₂ and opacity limits under 7011.2300	None	Both units are reserved for emergency use; EU004 qualifies as an insignificant activity. Potential SO ₂ emissions are approximately 58% of the applicable limit. As long as only diesel fuel oil is used, it is unlikely that the SO ₂ limit will be exceeded.

Emission Unit	Requirement	Additional Monitoring	Discussion
SV006 EU006	PM and opacity limits under 7011.0610	Stack testing by October 31, 2000	Previous stack test August of 1997, results required a 36 month testing frequency. However, the summer months (May – September) tend to be higher in humidity and result in poor drying conditions; therefore, the test deadline is extended 2 months, to the end of September. Recurring stack testing will be required based on those results.
SV007 EU007	PM and opacity limits under 7011.0715	Stack testing by 2/28/04	Stack testing was done on 2/17/99. Based on results, MPCA policy puts them on a 60 month testing schedule for this unit.
SV008 EU008	PM and opacity limits under 7011.0715	None	Estimated emissions based on similar operations (filling a bin with a dry product) are less than 1% of the applicable limit, when controlled by a baghouse. Non-compliance is unlikely.
CE001 CE002	Operate according to the pressure drop and water flow rate parameters stated (as appropriate)	Daily reading and recording of pressure drop and water flow rate	As prescribed by the control equipment rule, Minn. R. 7011.0070 – 7011.0080

4. Conclusion

Based on the information provided by Associated Milk Producers, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 07300016-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

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Attachments: A. Calculations
B. Facility Description

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Attachment A

Calculations

Attachment B
Facility Description