

AIR EMISSION PERMIT NO. 07300016- 002

IS ISSUED TO

Associated Milk Producers Inc

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

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

Permit Type	Application Date
Total Facility Operating Permit	May 23, 2001

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 as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal Part 70/Synthetic Minor PSD/NSR

Issue Date: April 3, 2002

Expiration: August 15, 2005

All Title I Conditions do not expire.

Ann M. Foss
Major Facilities Section Manager
Majors and Remediation Division

Karen A. Studders
Commissioner
Minnesota Pollution Control Agency

MMC:lh

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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:

This permitting action is a major amendment that removes the existing 0.5% sulfur content limit for fuel oil combusted in boiler 1 (EU 001), and replaces it with a 12-month rolling sum SO₂ limit of 240 tons per year. This amendment also adds propane as a fuel for boiler 2 (EU 002), revises air modeling requirements for the facility, and amends requirements in SV 006 and SV 007 based on October, 2000 performance testing.

The facility remains a non-major source under federal New Source Review/Prevention of Significant Deterioration regulations and a major source under the Part 70 permit program. The facility produces and packages natural cheeses and dries and packages concentrated cheese whey.

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/03/02

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

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

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)
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not 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

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

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 AND PRODUCTION 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)
Process Throughput: less than or equal to 7370 lbs/hour on a weekly block average (measured as dried whey collected in EU 010; downtime of 15 or more minutes is not included as operating time).	Minn. R. 7017.2025, subp. 3
TESTING AND MONITORING REQUIREMENTS	hdr
Performance Test: due before end of each calendar 36 months starting 10/31/2003 to measure total particulate matter emissions.	Minn. R. 7017.2020, subp. 1 [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

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

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. 7017.2020, subp. 1 [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 (CE 001 - wet scrubber)	hdr
The Permittee shall operate the control equipment (CE 001 - 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 0.5 inches of water column and less than or equal to 6.0 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
Wet Scrubber Water flow rate: greater than or equal to 1.5 gallons/minute	Minn. R. 7011.0075, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

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

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

Subject Item: EU 001 Boiler #1

Associated Items: SV 001 Nebraska Boiler Stack

What to do	Why to do it
EMISSION LIMITS	hdr
Sulfur Dioxide: less than or equal to 240 tons/year calculated on a 12-month rolling sum basis.	Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21
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 0.11 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
Permitted Fuel Types: Pipeline natural gas and fuel oil.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
EU 001 Fuel Usage: By the 15th day of each month, the Permittee shall calculate and record for the previous month, total EU 001 fuel oil usage in gallons per month, and natural gas usage in million cubic feet per month.	Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5
<p>Fuel Oil Sulfur Content Monitoring: The Permittee shall determine the sulfur content in percent by weight, of all fuel oil deliveries by one of the following two methods:</p> <p>Method 1: Fuel Oil Supplier Certification - The Permittee shall obtain and maintain a fuel oil supplier certification from the fuel supplier for each shipment of fuel oil. The certification shall specify the percent sulfur (by weight) in the fuel oil. In addition, if the Permittee uses Method 1, immediately prior to any fuel oil delivery, the Permittee shall measure and record the volume of fuel oil (in gallons) in the fuel oil storage tank.</p> <p>OR (continued below)</p>	Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5
<p>Fuel Oil Sulfur Content Monitoring (continued)</p> <p>Method 2: The Permittee may also analyze the fuel oil in the following manner:</p> <p>a) The Permittee shall sample the fuel oil from the tank after each delivery but not more than once each calendar week when multiple deliveries are made in a calendar week. Sampling shall be conducted within 48 hours after each delivery, or within 48 hours after the last of multiple deliveries in a calendar week. Samples shall be collected from a location representative of the contents of the tank. Record the date and time of delivery, time of fuel sampling, initials of person recording the information, and the results of the fuel analysis.</p> <p>b) The Permittee shall analyze the oil sample to determine sulfur content of the fuel oil in percent by weight, in accordance with ASTM Method D-1552 or the current ASTM method.</p>	Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5
Initial Determination of Sulfur Content Of Fuel Oil In Storage Tank: Prior to any fuel oil delivery and prior to combustion of any fuel oil after issuance of this permit, the Permittee shall sample and analyze the fuel oil in the fuel oil storage tank, in order to determine the percent sulfur by weight of the oil. Sampling and analysis shall follow the requirements of Method 2 above. The Permittee shall keep a record of the analysis.	Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5
<p>Determination Of Sulfur Content Of Fuel Oil In Storage Tank: Immediately after any fuel oil delivery, the Permittee shall determine and record the sulfur content of the fuel, in percent by weight, in the fuel oil storage tank by either:</p> <ol style="list-style-type: none"> Method 2 described above; or Calculating the prorated sulfur content based on known sulfur content and fuel volume in the tank prior to delivery, and percent sulfur content and volume of the fuel delivery. The calculation shall be made using the equation below: $So = [(Ve * Se) + (Vd * Sd)]/Vt$ <p>where:</p> <p>So = prorated sulfur content after fuel delivery (% by wt) Ve = volume of fuel oil in tank prior to delivery (gallons) Se = sulfur content of fuel oil in tank prior to delivery (% by wt) Vd = volume of delivery (gallons) Sd = sulfur content of delivered fuel (% by wt) determined using Method 1 above Vt = total fuel volume in tank after delivery, Vt = Ve + Vd (gallons)</p>	Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

<p>EU 001 Monthly SO2 Emissions Calculations: By the 15th day of each month, calculate and record:</p> <p>SO2 emissions during the previous month (tons per month) using the following equation:</p> $[(So * 0.1576 * FO) + (0.63 * NG)]/2000 = \text{Total EU 001 SO2 emissions (tons/month)}$ <p>where: So = % sulfur by wt. in fuel oil, as determined under the "Determination Of Sulfur Content Of Fuel Oil In Storage Tank" except the sulfur content determined under "Initial Determination Of Sulfur Content of Fuel Oil in Storage Tank" shall be used after permit issuance and up to the first fuel oil delivery after permit issuance FO = EU 001 fuel oil usage (gallons/month) NG = EU 001 natural gas usage (million cubic feet/month)</p>	<p>Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5</p>
<p>EU 001 12-month Rolling Sum SO2 Emissions Calculations:</p> <p>By the 15th day of each month, calculate and record the SO2 emissions for the previous 12-month period by summing the monthly Total EU 001 SO2 emissions for the previous 12 months. During the first 11 months after permit issuance, the Permittee shall use actual monthly SO2 emissions data for months prior to permit issuance, to calculate the 12-month sum.</p>	<p>Title I Condition: To limit SO2 emissions to less than the major source level under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

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

What to do	Why to do it
Permitted Fuel Types: Pipeline natural gas and propane	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

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

Subject Item: EU 003 Main Emergency Generator**Associated Items:** SV 003 Main Emergency 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 attained	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

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

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 B: SUBMITTALS

04/03/02

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

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

What to send	When to send	Portion of Facility Affected
Computer Dispersion Modeling Information	due 1,096 days after Permit Issuance. Submit modeling data as specified in MPCA guidance for Modeling Information Requests for PM10, SO2, and NOx. 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

TABLE B: RECURRENT SUBMITTALS

04/03/02

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016 - 002

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 MATERIAL

Facility Name: Associated Milk Producers Inc - Dawson

Permit Number: 07300016-002

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 • Emergency generator (wastewater treatment plant), PTE below all thresholds in 1 & 2 • Wastewater treatment plant, PTE below all thresholds in 1 & 2 	Minn. R. 7011.0710/0715 Minn. R. 7011.2300 Minn. R. 7011.0710/0715
3(J)	Fugitive Emissions from roads and parking lots.	Minn. R. 7011.0150

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 07300016-002

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

1. General

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
(based on Technical Support Document for Permit No. 07300016-001)

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.
- A 100,000 gallon fuel oil storage tank

1.3 Description of changes allowed by this permit issuance

This permitting action is a major amendment that removes the 0.5% sulfur content limit for fuel oil combusted in boiler 1 (EU 001), and replaces it with a 12-month rolling sum SO₂ limit of 240 tons per year. No boiler modification is necessary to accommodate the use of higher sulfur (residual) fuel oil; therefore this is not a modification under NSPS and subpart Dc does not apply to EU 001.

This amendment also adds propane as a permitted fuel for boiler 2 (EU 002), and revises air modeling requirements for the facility. The state-only air emission modeling requirements have been revised to reflect current policy; only the submittal of air modeling information for PM₁₀, SO₂, and NO_x is required instead of conducting the actual modeling for PM₁₀ and NO_x. SO₂ has been added to the modeling requirements because permitted emissions exceed 100 tpy (but are still restricted to less than 250 tpy). The facility remains a non-major source under federal New Source Review/Prevention of Significant Deterioration regulations and a major source under the Part 70 permit program.

Finally, the SV 006 requirements were revised based on the December 1, 2000, Notice of Compliance (test frequency and production limit were inserted). Also, based on the Permittee's comments on this draft permit, a requirement for minimum scrubber water flow rate was added to SV 007, and the scrubber pressure drop values were revised.

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.

Permit Number and Issuance Date	Action Authorized
NA	NA – last permit issued was part 70 permit in August 2000

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

Emissions Changes										
EU #	SV#	Emission Unit Description	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	All HAPs tpy
001	001	Boiler 1	9.99	10.12	104.83	18.53	0	0	0	0
002	002	Boiler 2	0	0	0	35.57	0	0	0	0
TOTAL			9.99	10.12	104.83	54.10	0	0	0	0

	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	All HAPs tpy
Total Facility Limited Potential Emissions	181.07	179.31	240.53	136.62	53.11	5.25	0.003	0.27
Total Facility Actual Emissions*	97.46	103.67	5.28	17.75	13.86	0.90	0	not reported

*1999 Emission Inventory

Table 2. Facility and Permit Classification

Classification	Major/Affected Source	*Synthetic Minor	*Minor
PSD		SO ₂	PM, PM ₁₀ , NO _x , CO, VOC, Lead
NAAR	NA	NA	NA
Part 70 Permit Program	PM ₁₀ , SO ₂ , NO _x		VOC, CO, HAPs

* 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 and/or Statutory Basis

Summary Regulatory and/or Statutory Basis of the Emission or operational Limit

Regulatory Overview of Facility

EU, GP, or SV #	Applicable Regulations	**Comments:
EU 001	Title I Condition: 40 CFR §52.21	Limit on SO ₂ emissions on a 12-month rolling sum basis to avoid major source status under 40 CFR § 52.21
EU 002	Minn. R. 7007.0800	Propane added as a permitted fuel in addition to natural gas
Total Facility	Minn. R. 7007.0800	State-only requirement to submit air quality modeling information for PM ₁₀ , SO ₂ , and NO _x
SV 006	Minn. R. 7017.2025 subp. 3 and 7017.2020, subp. 1	Production limit and (3 yr) testing frequency inserted based on results of Oct 2000 performance test
SV 007	Minn. R. 7011.0075	Revised scrubber operating parameters based on Permittee's data

3. Technical Information

Boiler 1 has always been able to burn residual fuel oil and does not need any modification in order to resume burning residual oil. Therefore this permit action does not also constitute a modification according to 40 CFR § 60.14(e)(4). Also note that PER 001 Boiler 1 calculations were made assuming a sulfur content of 0.05% by weight. However, calculations should have been made using 0.5% by weight as this is the sulfur content limit. As a result, the calculated SO₂, PM, and PM₁₀ emission were too low. This is why the difference in limited potential emissions from PER 001 to PER 002 is not equal to the emission changes shown above in Table 1.

No comments were received during the 30-day public notice, or the 45-day EPA review period.

4. Conclusion

Based on the information provided by the 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. 07300016-002 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Marshall M. Cole, Cary Hernandez

Attachment: Calculations

Permit Action Number: No. 07300016-002

Date: 12/8/2003