

**AIR EMISSION PERMIT NO. 10900010- 001
IS ISSUED TO**

ASSOCIATED MILK PRODUCERS, INC.
700 1st Avenue Southeast
Rochester, Olmsted County, Minnesota 55904

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	12/12/94

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 and with all general conditions listed in Minn. R. 7007.0800, subp. 16, which are incorporated by reference. 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: State; Synthetic Minor PSD/NSR

Issue Date: May 5, 1997

Expiration: Permit does not expire
All Title I Conditions do not expire.

Michael J. Sandusky
Acting Division Manager
Air Quality Division

for Peder A. Larson
Commissioner
Minnesota Pollution Control Agency

DLB:lao

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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	(612)296-6300
Outside Metro Area	1-800-657-3864
TTY	(612)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. 70007.1800, 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. Any requirements which have been determined not to apply are listed in Table A of this permit.

The permit shield, however does not apply to: Minn. R. ch. 7030 (Noise Pollution Control).

FACILITY DESCRIPTION:

Associated Milk Producers, Inc. is a milk processing facility. Emission units at this facility include four boilers which can combust either natural gas or number 6 fuel oil, a milk products dryer, dried product packaging equipment, and an emergency generator. This permit includes limits on the amount of number 6 fuel oil used in the boilers and on the annual hours of operation of the generator so that this facility is not a major source as defined in 40 CFR pt. 51, 52 or 70.

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste
 Permit Number: 10900010 - 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
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.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Shutdowns: Notify the Commissioner at least 24 hours in advance of shutdown of any process or control equipment if the shutdown would cause an increase in the emission of air contaminants. At the time of notification, notify the Commissioner of the cause of the shutdown and the estimated duration. Notify the Commissioner again when the shutdown is over.	Minn. R. 7019.1000, subp. 1
Breakdowns: Notify the Commissioner immediately of a breakdown of more than one hour duration of any process or control equipment if the breakdown causes an increase in the emission of air contaminants. At the time of notification or as soon thereafter as possible, the permittee shall also notify the Commissioner of the cause of the breakdown and the estimated duration. Notify the Commissioner again when the breakdown is over.	Minn. R. 7019.1000, subp. 2
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)
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
Oral Notification of Deviations Endangering Human Health or the Environment: Within 24 hours of discovery, orally notify the Commissioner of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7007.0800, subp. 6(A)
Discovery of Deviations Endangering Human Health or the Environment Report (written): due two working days after discovery of deviation, submit a written description of any deviation endangering human health or the environment to the Commissioner. Include the following information in this written description: cause of the deviation; exact dates of the period of the deviation; if the deviation has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7007.0800, subp. 6(A)
Application for Permit Amendment: If you need a permit amendment, submit 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
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
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
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises, to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Deviations from requirements cited as "Title 1 Condition: State Implementation Plan for SO2" shall be reported semiannually with the Semiannual Deviations Report required by this permit. If there were no deviation from any requirement cited as "Title 1 Condition: State Implementation Plan for SO2", the Permittee shall indicate such in the Semiannual Deviations Report.	Title 1 Condition: State Implementation Plan for SO2

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Record keeping: 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 strip-chart 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)
State Implementation Plan Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of the required monitoring, sample, measurement, or report that corresponds with a "Title 1 Condition: State Implementation Plan for SO2" requirement.	Title 1 Condition: State Implementation Plan for SO2
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)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 - 7030.0080
Amendments to Title 1 Conditions: If any permit requirement cited as "Title 1 Condition: State Implementation Plan for SO2" is amended, the amendment must first comply with procedures of parts 7007.0850 (Permit Application Notice and Comment) and 7007.0950 (EPA Review and Objection) applicable to major amendments to Part 70 permits.	Title 1 Condition: State Implementation Plan for SO2
General Conditions: The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste
 Permit Number: 10900010 - 001

Subject Item: GP 001 4 gas/oil-fired boilers

Associated Items: EU 001 No 1 North Boiler
 EU 002 No 2 North Boiler
 EU 003 No 3 Boiler
 EU 004 No 4 South Boiler

What to do	Why to do it
Fuel Usage: less than or equal to 520,000 gallons/year of fuel oil, based on a 12-month rolling sum.	Title 1 Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; and to avoid classification as a major source under 40 CFR Section 70.2
The permittee shall calculate and record the 12-month rolling sum of fuel oil usage. The calculation and recording shall be conducted no later than the 15th day of each month, for the previous 12-month period. For the first 12 months following issuance of the permit, past operating records shall be used to determine the 12-month rolling sum.	Minn. R. 7007.0800, subp. 2 Title 1 Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; and to avoid classification as a major source under 40 CFR Section 70.2

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: SV 001

- Associated Items:** EU 001 No 1 North Boiler
 EU 002 No 2 North Boiler
 EU 003 No 3 Boiler
 EU 004 No 4 South Boiler

What to do	Why to do it
Fuel Usage: less than or equal to 1040 gallons/hour of fuel oil. The permittee shall determine hourly fuel oil usage with a fuel flow meter.	Title 1 Condition: State Implementation Plan for SO2
Record total fuel oil usage for EU001, EU002, EU003, and EU004 in any hour during which fuel oil is combusted in EU001, EU002, EU003, or EU004.	Title 1 Condition: State Implementation Plan for SO2
<p>Sulfur Content of Fuel: less than or equal to 1.85 percent by weight . The permittee shall demonstrate compliance with the fuel oil sulfur content limit by either method 1 or 2. All fuel oil sulfur content data shall be recorded, and records maintained for at least five years from the date of recording.</p> <p>Method 1. The Permittee shall obtain and maintain a fuel supplier receipt from the fuel supplier for each shipment of fuel oil delivered certifying that the shipment complies with the American Society of Testing and Materials (ASTM) specification for fuel oil (ASTM D 396 or current ASTM specification) and that the sulfur content is less than or equal to 1.85 percent by weight.</p> <p>OR (continued on next requirement)</p>	Title 1 Condition: State Implementation Plan for SO2
<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(s) 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 1 Condition: State Implementation Plan for SO2

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: SV 003**Associated Items:** EU 006 Lactose dryer

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: SV 004**Associated Items:** EU 006 Lactose dryer

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: SV 005**Associated Items:** EU 008 Bag Filler

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: EU 001 No 1 North Boiler**Associated Items:** GP 001 4 gas/oil-fired boilers
SV 001

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million BTU heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except that a maximum of 60 percent opacity is permissible for four minutes in any 60-minute period and a maximum of 40 percent opacity is permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0510, subp. 2
Fuel types limited to natural gas, fuel oil, and on-site generated used oil.	Minn. R. 7007.0800, subp. 2
Combust used oil in accordance with used oil rules in Minn. R. ch. 7045.	Minn. R. ch. 7045

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: EU 002 No 2 North Boiler**Associated Items:** GP 001 4 gas/oil-fired boilers
SV 001

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million BTU heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except that a maximum of 60 percent opacity is permissible for four minutes in any 60-minute period and a maximum of 40 percent opacity is permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0510, subp. 2
Fuel types limited to natural gas, fuel oil, and on-site generated used oil.	Minn. R. 7007.0800, subp. 2
Combust used oil in accordance with used oil rules in Minn. R. ch. 7045.	Minn. R. ch. 7045

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: EU 003 No 3 Boiler**Associated Items:** GP 001 4 gas/oil-fired boilers
SV 001

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million BTU heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except that a maximum of 60 percent opacity is permissible for four minutes in any 60-minute period and a maximum of 40 percent opacity is permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0510, subp. 2
Fuel types limited to natural gas, fuel oil, and on-site generated used oil.	Minn. R. 7007.0800, subp. 2
Combust used oil in accordance with used oil rules in Minn. R. ch. 7045.	Minn. R. ch. 7045

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: EU 004 No 4 South Boiler**Associated Items:** GP 001 4 gas/oil-fired boilers
SV 001

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million BTU heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except that a maximum of 60 percent opacity is permissible for four minutes in any 60-minute period and a maximum of 40 percent opacity is permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0510, subp. 2
Fuel types limited to natural gas, fuel oil, and on-site generated used oil.	Minn. R. 7007.0800, subp. 2
Combust used oil in accordance with used oil rules in Minn. R. ch. 7045.	Minn. R. ch. 7045

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: EU 005 Diesel Generator

Associated Items: SV 002

What to do	Why to do it
Opacity: greater than 20 percent opacity for not more than ten consecutive seconds once operating temperatures have been obtained.	Minn. R. 7011.2300, subp. 1
Operating Hours: less than or equal to 200 hours/year using 12 Month Rolling Sum to limit the emission of nitrogen oxides from the entire facility to less than 100 tons per year.	Limit to avoid classification as a major source under 40 CFR Section 70.2
The permittee shall calculate and record the 12-month rolling sum of operating hours for EU005. The calculation and recording shall be conducted no later than the 15th day of each month, for the previous 12-month period. For the first 12 months following issuance of the permit, past operating records shall be used to determine the 12 month rolling sum.	Minn. R. 7007.0800, subp. 2
<p>Fuel is restricted to distillate oil with a maximum sulfur content of 0.33 percent by weight. The permittee shall demonstrate compliance with the fuel oil sulfur content limit by either method 1 or 2, and by maintaining all analyses and receipts for a minimum of 5 years:</p> <p>Method 1. The Permittee shall obtain and maintain a fuel supplier receipt from the fuel supplier for each shipment of distillate oil delivered certifying that the shipment complies with the American Society of Testing and Materials (ASTM) specifications for distillate fuel oil and that the sulfur content is less than or equal to 0.33 percent by weight;</p> <p>OR (continued on next requirement)</p>	Title 1 Condition: State Implementation Plan for SO2
<p>Method 2. The Permittee may also analyze the distillate fuel oil in the following manner:</p> <p>a) The Permittee shall sample the fuel oil from the tanks(s) 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 the sulfur content of the fuel oil in percent by weight, in accordance with ASTM Method D-1552 or the current ASTM method.</p>	Title 1 Condition: State Implementation Plan for SO2

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: CE 001 Fabric Filter - Medium Temperature i.e., 180 F<T<250 F**Associated Items:** EU 006 Lactose dryer

What to do	Why to do it
Pressure Drop: greater than or equal to 1.0 inches of water column and less than or equal to 6.0 inches of water column	Minn. R. 7007.0800, subp. 2
The permittee shall record the pressure drop once every 24 hours if in operation.	Minn. R. 7007.0800, subp. 4(D)
Inspect monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2
Inspect quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: CE 002 Fabric Filter - Medium Temperature i.e., 180 F<T<250 F**Associated Items:** EU 006 Lactose dryer

What to do	Why to do it
Pressure Drop: greater than or equal to 1.0 inches of water column and less than or equal to 6.0 inches of water column	Minn. R. 7007.0800, subp. 2
The permittee shall record the pressure drop once every 24 hours if in operation.	Minn. R. 7007.0800, subp. 4(D)
Inspect monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2
Inspect quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

Subject Item: CE 003 Fabric Filter - Medium Temperature i.e., 180 F<T<250 F**Associated Items:** EU 008 Bag Filler

What to do	Why to do it
Pressure Drop: greater than or equal to 1.0 inches of water column and less than or equal to 6.0 inches of water column	Minn. R. 7007.0800, subp. 2
The permittee shall record the pressure drop once every 24 hours if in operation.	Minn. R. 7007.0800, subp. 4(D)
Inspect monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2
Inspect quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2

TABLE B: SUBMITTALS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste
Permit Number: 10900010 - 001

Table B lists the submittals you must send to the Commissioner. Table B is divided into two sections, for source-specific submittal requirements and for submittals required of all permittees. Source-specific submittals are further organized as either one-time only or recurrent requirements. You may also be subject to additional reporting requirements contained in the compliance schedule located in Table C of this permit. All submittals must be postmarked or received by the date specified in the table, and certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Submittals which must be provided on standardized forms approved by the Commissioner are noted in Tables B and C.

Send any application for a permit or permit amendment to: Permit Information Coordinator, Permit Section, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4914. Also send the Permit Information Coordinator notices of: accumulated insignificant activities, installation of control equipment, replacement of an emissions unit, and changes that contravene a permit term.

Send all other submittals to: Compliance Tracking Coordinator, Compliance Determination Unit, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

TABLE B: RECURRENT SUBMITTALS

05/05/97

Facility Name: Associated Milk Producers Inc - Rocheste

Permit Number: 10900010 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance The first report covers January 1 - June 30. The second report 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. The report covers all deviations experienced during the calendar year.	Total Facility
Emissions 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	Total Facility

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 10900010-001

This technical support document is for all persons interested in the draft permit and to meet the requirements that have been set forth by the federal regulations and Minnesota Rules (40 CFR, Section 70.7(a)(5) and Minn. R. 7007.0850, subp. 1.) The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the draft permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 2022)
Associated Milk Producers, Inc.	Associated Milk Producers, Inc.
P.O. Box 5040	700 1st Avenue Southeast
1600 East. Lamar	Rochester, Minnesota 55904
Arlington, Texas 76005	

1.2. Description Of The Permit Action

Associated Milk Producers, Inc. (AMPI) has submitted an application for a Total Facility Air Emission Permit as required by Minn. R. ch. 7007. Minn. R. ch. 7007, implements Title 5 of the federal Clean Air Act as amended 1990. The application was received in September 1994.

The emission units at the facility which are included in the permit include four boilers which exhaust through a common stack, a lactose dryer and bag filling equipment, and an emergency generator driven by a diesel engine.

The permit action described in this Technical Support Document is the issuance of a total facility operating permit for this facility. The total facility operating permit contains all requirements of all State Rules and federal regulations based on the federal Clean Air Act.

Since the Rochester area is currently classified as nonattainment for Sulfur Dioxide (SO₂) the MPCA is responsible for developing a State Implementation Plan (SIP) to attain and maintain the ambient air standard for SO₂ in that area. This permit thus also contains conditions on the emission of SO₂ in addition to any imposed by other state rules and federal regulations to demonstrate compliance with the ambient air standard for SO₂. After completion of public notice and issuance, the permit will be submitted to U.S. Environmental Protection Agency (EPA) as part of the SIP for SO₂ for the Rochester area.

1.3. Facility Emissions

Table 1. Total Facility Potential to Emit Summary and Attainment Status:

Pollutant	Potential to Emit (Tons/year =TPY)	Attainment or Unclassified? (Yes or No)
Particulate Matter (PM)	77.9	Not Applicable
Particulate Matter less than 10 micron (PM ₁₀)	76.7	Yes
Sulfur Dioxide (SO ₂)	83.4	No
Nitrogen Oxides (NO _x)	99.7	Yes
Volatile Organic Compounds (VOCs)/Ozone	2.0	Yes
Carbon Monoxide (CO)	22.3	Yes
Lead	0.1	Yes
HAP	4.4	Not Applicable

Table 2. Facility Classification

Classification (put x in appropriate box)	Major	Synthetic Minor	Minor	N/A
Prevention of Significant Deterioration		X		
Non Attainment Area (list pollutant)		X, SO ₂		
Operating Permit Program		X		

2. Regulatory and/or Statutory Basis of Emission Limit

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

Group: GP001, boilers 1 - 4 Stack/Vent I.D.: 001

Emission Limit and/or Special Conditions:

Fuel Usage: less than or equal to 520,000 gallons fuel oil used per 12-months

Recordkeeping: maintain a record of the 12 Month Rolling Sum of fuel oil used

Factual and legal basis for above: Minn. R. 7007.0250, subp. 5, to qualify for a nonexpiring State permit in place of a Part 70 permit

Comments: AMPI would be required to obtain a Part 70 permit, valid for five years, if it chose not to have any limits on amount of fuel used or hours operated. By limiting fuel oil used to 520,000 gallons per year (together with a limit on the hours of operation of the diesel generator discussed under EU005 below), each criteria pollutant is limited to less than 100 tons per year and the source qualifies for a nonexpiring State permit.

Stack/Vent: SV001 Emission Unit: EU001, 002, 003, and 004, boilers

Emission Limit and/or Special Conditions:

Fuel Usage: less than or equal to 1040 gallons per hour No. 6 fuel oil

Recordkeeping: record hourly fuel oil use when fuel oil is combusted

Sulfur Content of Fuel: less than or equal to 1.85% by weight

Monitoring Sulfur Content of Fuel: AMPI must either obtain a certification from the fuel supplier for the sulfur content of the fuel oil, or analyze a sample of the fuel oil

Factual and legal basis for above: Minn. R. ch. 7009, ambient air quality standards

Comments: There is no other Minnesota Rule or federal regulation which limits the hourly emission of SO₂ from boilers of the size and age at AMPI. Therefore, to protect the ambient air standard for SO₂, and to demonstrate that the ambient air in the Rochester area will attain and maintain the ambient air standard for SO₂ when all sources of SO₂ are considered, limits of 1040 gallons/hour and 1.85% sulfur is required by the permit. This limit on sulfur content limits emission of SO₂ to less than 2 lbs/million BTU of heat input. This is the same limit required of larger and newer boilers subject to other Minnesota Rules and No. 6 fuel oil is commonly available meeting this limit.

Stack/Vent: SV003 Emission Unit: EU006, lactose dryer

Emission Limit and/or Special Conditions:

Particulate matter: less than or equal to 0.3 grain per dry standard cubic foot unless required to further reduce particulate matter emissions according to Minn. R. 7011.0715, subp. 1(A).

Opacity: less than or equal to 20% opacity

Factual and legal basis for above: Minn. R. 7011.0715, subp. 1 (A) and (B)

Comments: Minn. R. 7011.0715, subp. 1(A), specifies that industrial process equipment must not emit PM in excess of the amount in pounds per hour specified by Table 1 in the Rule, but that the emission rate expressed in grains per dry standard cubic foot is not required to be less than the amount specified in Table 2. In other words, the equipment can emit PM at the higher of Table 1 and 2. However, in no case can the emission exceed 0.3 grain per cubic foot.

At a drying capacity of 3000 lb/hr, the particulate matter emission allowed from the dryer by Minn. R. 7011.0715, subp. 1(A), Table 1, is 4.62 lb/hr.

At an exhaust gas flowrate from the dryer of 6000 scfm, 4.62 lb/hr corresponds to 0.090 gr/dscf. Table 2 allows 0.10 gr/dscf, so 0.10 gr/dscf is the limit and the allowable emission rate is 5.14 lb/hr.

Stack/Vent: SV004 Emission Unit: EU006, delumper and conveyor

Emission Limit and/or Special Conditions:

Particulate matter: less than or equal to 0.3 grain per dry standard cubic foot unless required to further reduce particulate matter emissions according to Minn. R. 7011.0715, subp. 1(A).

Opacity: less than or equal to 20% opacity

Factual and legal basis for above: Minn. R. 7011.0715, subp. 1 (A) and (B)

Comments: Minn. R. 7011.00715, subp. 1(A), specifies that industrial process equipment must not emit particulate matter in excess of the amount in pounds per hour specified by Table 1 in the Rule, but that the emission rate expressed in grains per dry standard cubic foot is not required to be less than the amount specified in Table 2. In other words, the equipment can emit PM at the higher of Table 1 and 2. However, in no case can the emission exceed 0.3 grain per cubic foot.

At a capacity of 3000 lb/hr, the particulate matter emission allowed from the delumper and conveyor by Minn. R. 7011.00715, subp. 1(A), Table 1, is 4.62 lb/hr. At an exhaust gas flowrate from the conveyor of 2500 scfm, 4.62 lb/hr corresponds to 0.22 gr/dscf. Table 2 allows 0.10 gr/dscf, so 4.62 lb/hr is the limit.

Stack/Vent: SV005 Emission Unit: EU008, bag filler

Emission Limit and/or Special Conditions:

Particulate matter: less than or equal to 0.3 grain per dry standard cubic foot unless required to further reduce particulate matter emissions according to Minn. R. 7011.0715, subp. 1(A).

Opacity: less than or equal to 20% opacity

Factual and legal basis for above: Minn. R. 7011.0715, subp. 1 (A) and (B)

Comments: Minn. R. 7011.00715, subp. 1(A), specifies that industrial process equipment must not emit particulate matter in excess of the amount in pounds per hour specified by Table 1 in the Rule, but that the emission rate expressed in grains per dry standard cubic foot is not required to be less than the amount specified in Table 2. In other words, the equipment can emit PM at the higher of Table 1 and 2. However, in no case can the emission exceed 0.3 grain per cubic foot.

Emission Unit: EU001, boiler Stack/Vent I.D.: 001

Emission Limit and/or Special Conditions:

Particulate matter: 0.6 lb/million BTU heat input

Opacity: less than or equal to 20% opacity except that a maximum of 60% opacity is permissible for four minutes in any 60-minute period and a maximum of 40% opacity is permissible for four additional minutes in any 60-minute period

Factual and legal basis for above:

Particulate matter: Minn. R. 7011.0510, subp. 1

Opacity: Minn. R. 7011.0510, subp. 2

Used Oil as Fuel: Minn. R. ch. 7045

Comments: Minn. R. 7011.0510, subp. 1 specifies a limit of 0.6 lb/mmBTU for boilers of this size and age. EPA published data indicates that emission of PM from combustion of No. 6 fuel oil will be approximately 0.14 lb/mmBTU and even less from natural gas.

Emission Unit: EU002, boiler Stack/Vent I.D.: 001

Emission Limit and/or Special Conditions:

Particulate matter: 0.6 lb/million BTU heat input

Opacity: less than or equal to 20% opacity except that a maximum of 60% opacity is permissible for four minutes in any 60-minute period and a maximum of 40% opacity is permissible for four additional minutes in any 60-minute period

Factual and legal basis for above:

Particulate matter: Minn. R. 7011.0510, subp. 1

Opacity: Minn. R. 7011.0510, subp. 2

Used Oil as Fuel: Minn. R. ch. 7045

Comments: Minn. R. 7011.0510, subp. 1 specifies a limit of 0.6 lb/mmBTU for boilers of this size and age. EPA published data indicates that emission of PM from combustion of no. 6 fuel oil will be approximately 0.14 lb/mmBTU and even less for natural gas.

Emission Unit: EU003, boiler Stack/Vent I.D.: 001

Emission Limit and/or Special Conditions:

Particulate matter: 0.6 lb/million BTU heat input
Opacity: less than or equal to 20% opacity except that a maximum of 60% opacity is permissible for four minutes in any 60-minute period and a maximum of 40% opacity is permissible for four additional minutes in any 60-minute period
Fuels Used: in addition to natural gas and fuel oil, this boiler will be allowed to burn on-site generated used lubricating oil

Factual and legal basis for above:

Particulate matter: Minn. R. 7011.0510, subp. 1
Opacity: Minn. R. 7011.0510, subp. 2
Used Oil as Fuel: Minn. R. ch. 7045

Comments: Minn. R. 7011.0510, subp. 1 specifies a limit of 0.6 lb/mmBTU for boilers of this size and age. EPA published data indicates that emission of PM from combustion of no. 6 fuel oil will be approximately 0.14 lb/mmBTU and even less for natural gas.

Emission Unit: EU004, boiler Stack/Vent I.D.: 001

Emission Limit and/or Special Conditions:

Particulate matter: 0.6 lb/million BTU heat input
Opacity: less than or equal to 20% opacity except that a maximum of 60% opacity is permissible for four minutes in any 60-minute period and a maximum of 40% opacity is permissible for four additional minutes in any 60-minute period

Factual and legal basis for above:

Particulate matter: Minn. R. 7011.0510, subp. 1
Opacity: Minn. R. 7011.0510, subp. 2
Used Oil as Fuel: Minn. R. ch. 7045

Comments: Minn. R. 7011.0510, subp. 1 specifies a limit of 0.6 lb/mmBTU for boilers of this size and age. EPA published data indicates that emission of PM from combustion of no. 6 fuel oil will be approximately 0.14 lb/mmBTU and even less for natural gas.

Emission Unit: EU005, diesel generator Stack/Vent I.D.: 002

Emission Limit and/or Special Conditions:

Opacity: greater than 20% opacity for not more than 10 consecutive seconds
Operating Hours: less than or equal to 200 hours per year
Recordkeeping: maintain a record of the 12-month rolling sum of operating hours
Sulfur Content of Fuel: fuel must be distillate fuel oil with less than or equal to 0.33% sulfur by weight

Factual and legal basis for above:

Opacity: Minn. R. 7011.2300, subp. 1
Operating Hours: Minn. R. 7007.0250, subp. 5, to qualify for a nonexpiring State permit in place of a Part 70 permit
Recordkeeping: maintain a record of the hours of operation as a 12-month rolling sum
Sulfur Content of Fuel: Minn. R. ch. 7009, ambient air standard for SO₂

Comments: AMPI would be required to obtain a Part 70 permit, valid for five years, if it chose not to have any limits on amount of fuel used or hours operated. By limiting hours of operation of the diesel generator to 200 hours per year, NO_x is limited to less than 100 tons per year and the source qualifies for a nonexpiring State permit.

Control Equipment: CE001, CE002, CE003

Emission Limit and/or Special Conditions:

Pressure Drop: to be maintained between 1 and 6 inches water column
Recordkeeping: record pressure drop once each day that the baghouse operates

Factual and legal basis for above:

Pressure Drop: Minn. R. 7007.0800 and 7011.0060 -7011.0080
Recordkeeping: Minn. R. 7007.0800 and 7011.0060 -7011.0080

Comments: By maintaining pressure drop in this range, the baghouse can be expected to continuously attain the efficiency assumed in the application.

3. 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. 10900010-001, and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

For further information, contact:

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