State of Utah

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Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN125760005-21

July 29, 2021

Paul Bytheway
Schreiber Foods Incorporated
400 North Washington St.
Green Bay, WI 54301
paul.bytheway@schreiberfoods.com

Dear Mr. Bytheway:

Re: Intent to Approve:
Minor Modification of Approval Order, DAQE-AN125760004-13 to Add a Boiler
Project Number: N125760005

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Andrea Bartlett,** as well as the DAQE number as shown on the upper right-hand corner of this letter. Andrea Bartlett, can be reached at (801) 834-8417 or abartlett@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:AB:sb

cc: Bear River Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN125760005-21
Minor Modification of Approval Order, DAQE-AN125760004-13 to Add a Boiler

Prepared By
Andrea Bartlett, Engineer
(801) 834-8417
abartlett@utah.gov

Issued to
Schreiber Foods Incorporated- Logan Cheese Processing Plant

Issued On
July 29, 2021

New Source Review Section Manager
Alan D. Humpherys

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Schreiber Foods Incorporated

Source Name
Schreiber Foods Incorporated - Logan Cheese Processing Plant

Mailing Address
400 North Washington St.
Green Bay, WI 54301

Physical Address
885 North 600 West
Logan, UT 84321

Source Contact
Name Paul Bytheway
Phone (920) 455-6109
Email paul.bytheway@schreiberfoods.com

UTM Coordinates
429,324 m Easting
4,622,172 m Northing
Datum NAD83
UTM Zone 12

SIC code 2022 (Cheese - Natural, Processed & Imitation)

SOURCE INFORMATION

General Description
Schreiber Foods Logan Cheese Processing Plant (Schreiber) is a distribution center that produces various cheese and yogurt. Raw ingredients are blended, cooked, and packaged onsite. The source has boilers, an emergency generator, and various tanks onsite.

NSR Classification
Minor Modification at Minor Source

Source Classification
Located in
Cache County
Airs Source Size: B

Applicable Federal Standards
NSPS (Part 60), A: General Provisions
NSPS (Part 60), Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
MACT (Part 63), A: General Provisions
MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Project Description
The source has requested to add an 8.16 MMBtu/hr natural gas-fired boiler to its facility. Facility-wide PTE was evaluated as part of this modification based on an updated equipment list and operation. Condition II.B.1.b was removed due to emissions being restricted by annual hours.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO_2 Equivalent	10922	33510.00
Carbon Monoxide	1.28	20.55
Nitrogen Oxides	0.40	28.88
Particulate Matter - PM_{10}	0.36	1.98
Particulate Matter - $PM_{2.5}$	0.36	1.98
Sulfur Dioxide	0.05	2.25
Volatile Organic Compounds	0.15	2.15

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Formaldehyde (CAS #50000)	0	26
Hexane (CAS #110543)	0	676
	Change (TPY)	**Total (TPY)**
Total HAPs	0	0.35

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in the The Herald Journal on July 31, 2021. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]
I.8	The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A THE APPROVED EQUIPMENT

II.A.1	**Logan Cheese Processing Plant**
II.A.2	**Boiler EP-1** Rating: 10.2 MMBtu/hr Fuel: Natural Gas Control: Low NO_x Burner NSPS Applicability: Subpart Dc
II.A.3	**Boiler EP-2** Rating: 8.2 MMBtu/hr Fuel: Natural Gas Secondary Fuel: Propane Control: Low NO_x Burner,Flue Gas Recirculation (FGR)
II.A.4	**Boiler EP-3** Rating: 8.2 MMBtu/hr Fuel: Natural Gas Secondary Fuel: Propane Control: Low NO_x burner, FGR
II.A.5	**Boiler EP-4** Rating: 16.7 MMBtu/hr Fuel: Natural Gas Secondary Fuel: Propane Control: Low NO_x Burner, FGR NSPS Applicability: Subpart Dc
II.A.6	**Boiler EP-5 (NEW)** Boiler Rating: 8.16 MMBtu/hr Fuel: Natural Gas Control: Ultra Low NO_x Burner
II.A.7	**Emergency Generator Engine** Rating: 150 kW Fuel: Ultra-low Sulfur Diesel NSPS Applicability: Subpart IIII MACT Applicability: Subpart ZZZZ
II.A.8	**Pressure Vessel Safety Vents.** The vents are only active during emergency situations.
II.A.9	**Ammonia Storage Tanks and Refrigeration System** The pressure relief valve is only activated during an emergency situation.
II.A.10	**Parts Washer** A recirculating system that is not vented to the atmosphere. For informational purposes only.

II.A.11	**Used Oil Tank** A self-contained system that does not release to the atmosphere. For informational purposes only.
II.A.12	**Propane Tank** For informational purposes only.
II.A.13	**Carbon Dioxide Tank** For informational purposes only.

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Site-Wide Requirements**
II.B.1.a	The owner/operator shall not allow visible emissions to exceed the following values: A. All boilers- 10% opacity B. Diesel-fired emergency generator engine- 20% opacity C. All other points- 20% opacity. [R307-305-3, R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]
II.B.2	**Boiler Requirements**
II.B.2.a	The owner/operator shall operate Boiler EP-4 with an oxygen trim system in use. [R307-401-8]
II.B.2.a.1	The owner/operator shall demonstrate compliance by maintaining a daily operating status log of the boiler, FGR system, and oxygen trim system. [R307-401-8]
II.B.2.b	The owner/operator shall install and operate Boiler EP-5 with a manufacturer specification of a NO_x emissions concentration of 9 ppm or less. [R307-401-8]
II.B.2.b.1	The owner/operator shall keep a record of the manufacturer specifications for Boiler EP-5. These records shall be kept for the lifetime of the equipment. [R307-401-8]
II.B.2.c	The owner/operator shall use a flue gas recirculation system at all times with Boiler's EP-2, EP-3, and EP-4. [R307-401-8]
II.B.3	**Emergency Engine Requirements**
II.B.3.a	The owner/operator shall not operate the emergency engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engine during emergencies. [40 CFR 60 Subpart ZZZZ, R307-401-8]

II.B.3.a.1	To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records documenting the operation of each emergency engine shall be kept in a log and shall include the following: A. The date the emergency engine was used B. The duration of operation in hours C. The reason for the emergency engine usage. [40 CFR 60 Subpart ZZZZ, R307-401-8]
II.B.3.a.2	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for the emergency engine. [40 CFR 60 Subpart ZZZZ, R307-401-8]
II.B.3.b	The owner/operator shall only use diesel fuel (e.g. fuel oil #1, #2, or diesel fuel oil additives) as fuel in the emergency engine. [R307-401-8]
II.B.3.b.1	The owner/operator shall only combust diesel fuel that meets the definition of ultra-low sulfur diesel (ULSD), which has a sulfur content of 15 ppm or less. [R307-401-8]
II.B.3.b.2	To demonstrate compliance with the ULSD fuel requirement, the owner/operator shall maintain records of diesel fuel purchase invoices or obtain certification of sulfur content from the diesel fuel supplier. The diesel fuel purchase invoices shall indicate that the diesel fuel meets the ULSD requirements. [R307-401-8]

PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes	DAQE-AN0125760004-13 dated September 6, 2013
Is Derived From	NOI dated April 27, 2021
Incorporates	Additional Information dated May 26, 2021

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO_x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds