B010

Ohio EPA

State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Fulton County
Application No: 03-0113
NSPS

CERTIFIED MAIL

June 2, 1997

LACHOY FOOD PRODUCTS
RICK ALLOMONG
901 STRYKER STREET
ARCHBOLD, OH 43502

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
NORTHWEST DISTRICT OFFICE, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

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State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 03-0113
APS Premise No. 0326000184
Permit Fee: $800.00

Name of Facility: LACHOY FOOD PRODUCTS

Person to Contact: RICK ALLOMONG

Address: 901 STRYKER STREET
ARCHBOLD, OH 43502

Location of proposed source(s): 901 STRYKER STREET
ARCHBOLD, OHIO

Description of proposed source(s):
89.2 MMBTU/HR NG FIRED BOILER.

Date of Issuance: June 2, 1997

Effective Date: June 2, 1997

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for LACHOY FOOD PRODUCTS located in Fulton County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
B010	89.2 mmBtu/hr natural gas fired boiler	Use of flue gas recirculation and compliance with the terms and conditions of this permit.	3745-31-05 3745-17-07 3745-17-10 40 CFR Part 60, Subpart Dc	0.02 lb PM/mmBtu (1.8 lbs PM/hr & 7.8 TPY) 0.035 lb NO_x/mmBtu (3.15 lbs NO_x/hr & 13.8 TPY) 0.146 lb CO/mmBtu (12.3 lbs CO/hr & 56.9 TPY) 20% opacity, except as provided by rule

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Particulate Matter	7.8
Nitrogen Oxide	13.8
Carbon Monoxide	56.9

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

Source No.	Source Description	NSPS Regulation (Subpart)
B010	NG fired boiler	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);
b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
c. actual start-up date (within 15 days after such date); and
d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and OEPA Northwest District Office - DAPC
347 North Dunbridge Road
Bowling Green, Ohio 43402

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

This PTI allows for the installation of a new 89.2 mmBtu/hr Natural Gas fired boiler with flue gas recirculation at the LaChoy Food Products facility in Archbold, Ohio.

A. Allowable Mass Emission Limitations and/or Control Requirements

The 89.2 mmBtu/hr natural gas fired boiler, Ohio EPA emissions unit No. B010 shall employ flue gas recirculation and shall be limited to the following emission rates:

1. 0.02 lb PM/mmBtu (1.8 lbs/hr & 7.8 TPY);
2. 0.035 lb NO_x/mmBtu (3.15 lbs/hr & 13.8 TPY);
3. 0.146 lb CO/mmBtu (13.0 lbs/hr & 56.9 TPY); and,
4. visible emissions shall be limited to 20 percent opacity as a six-minute average except as specified by OAC 3745-17-07 (A).

B. Operational Restrictions

The permittee shall only use natural gas as the fuel for emissions unit No. B010.

C. Monitoring & Recordkeeping Requirements

Pursuant to 40 CFR Part 60, Subpart Dc, the permittee shall maintain daily records of the amount of fuel used for emissions unit No. B010.

D. Reporting Requirements

None.

E. Testing Requirements

Compliance with the emission limitations in AST&C (A)(1) shall be determined in accordance with the following methods:

1. Emission limitation:
   0.02 lb PM/mmBtu

   Applicable Compliance Method:
   Calculations, using the AP-42 emission factor of 6.2 lbs/mmft^3 burned multiplied by the heat content of the fuel burned.

2. Emission limitation:
   1.8 lbs PM/hr

   Applicable Compliance Method:
   Calculations, using the AP-42 emission factor of 6.2 lbs/mmft^3 burned multiplied by the daily amount of fuel burned, divided by the number of hours B010 operated that day.

3. Emission limitation:
   7.8 tons PM/yr

   Applicable Compliance Method:
   Calculations, using an AP-42 emission factor of 6.2 lbs/mmft^3 burned multiplied by the annual amount of fuel burned.

4. Emission limitation:
   0.35 lb NO_x/mmBtu

   Applicable Compliance Method:
   Calculations, using the company supplied emission factor of 30 ppm of NO_x generated and applying the NO_x conversion curve submitted as part of PTI application, No. 03-0113. This conversion curve is part of the Cleaver Brooks™ emissions manual, figure E-6, page E-10, adjusted for 3 percent oxygen and 15 percent excess air.

5. Emission limitation:
3.15 lbs NO_x/hr

Applicable Compliance Method:
Calculations, using the emission factor generated in AST&C (E)(1)(d) multiplied by the daily amount of fuel burned, multiplied by the heat content of the fuel burned, divided by the number of hours B010 operated that day.

6. Emission limitation:
13.8 tons NO_x/yr

Applicable Compliance Method:
Calculations, using the emission factor generated in AST&C (E)(1)(d) above multiplied by the annual amount of fuel burned, multiplied by the heat content of the fuel burned.

7. Emission limitation:
0.146 lb CO/mmBtu

Applicable Compliance Method:
Calculations, using the company supplied emission factor of 200 ppm of CO generated and applying the CO conversion curve submitted as part of PTI application, No. 03-0113. This conversion curve is part of the Cleaver Brooks™ emissions manual, figure E-5, page E-9, adjusted for 3 percent oxygen and 15 percent excess air.

8. Emission limitation:
12.3 lbs CO/hr

Applicable Compliance Method:
Calculations, using the emission factor generated in AST&C (E)(1)(g) multiplied by the daily amount of fuel burned, multiplied by the heat content of the fuel burned, divided by the number of hours B010 operated that day.

9. Emission limitation:
56.9 tons CO/yr

Applicable Compliance Method:
Calculations, using the emission factor generated in AST&C (E)(1)(g) above multiplied by the annual amount of fuel burned, multiplied by the heat content of the fuel burned.

10. Emission limitation:
Visible emissions shall be limited to 20 percent opacity as a six-minute average except as specified by OAC 3745-17-07(A).

Applicable Compliance Method:
This permittee shall demonstrate compliance with the opacity restriction in AST&C (A)(2) as specified in OAC 3745-17-03.

F. Miscellaneous Requirements

None.