

1

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

GENERAL PERMIT CONDITIONS

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 SOURCE(S)

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 Ohio 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

2

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

(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 prove to be inadequate or 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 15 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.

3

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

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 made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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, regulations, and policies.

4

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

5

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **J M SMUCKER COMPANY** located in **WAYNE** County. The emissions units 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
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B011	Boiler #10 (20.93 MMBtu/hr) fired by natural gas/#2 fuel oil
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Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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BAT
Determination

Use of natural
gas and/or &2
fuel oil only
as fuel for
this unit.

Sulfur content
of No. 2 fuel
oil shall not
exceed 0.5
weight percent

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		(40 CFR 60 Subpart Dc)		oil shall not exceed 0.5 weight percent.
	Applicable Federal & OAC Rules	3745-18-06	Permit Allowable Mass Emissions and/or Control/Usage Requirements	See Additional Special Terms & Conditions A.3.
	3745-31-05		SO ₂ : 0.05 lb/MMBtu & 45.8 tpy	
			NO _x : 0.20 lb/MMBtu & 18.3 tpy	
			CO: 0.09 lb/MMBtu & 8.25 tpy	
			Visible emissions shall not exceed 5% opacity, as a six minute average.	
	3745-17-07 (B) (1)		PM: 0.020 lb/MMBtu of actual heat input & 1.84 tpy.	
	3745-17-07		See Additional; Special Terms & Conditions A.2.	
	40 CFR 60.42c		Sulfur content of No. 2 fuel	

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate (PM)	1.84 tpy
Sulfur Dioxide (SO ₂)	45.8 tpy
Nitrogen Oxides (NO _x)	18.3 tpy
Carbon Monoxide (CO)	8.25 tpy

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.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B011	Boiler #10 (20.93 MMBtu/hr)	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);

9

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

- 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

**Ohio EPA,
Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087**

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 **Ohio EPA, Northeast District Office,**

10

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

2110 E. Aurora Road, Twinsburg, OH 44087.

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.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Source Description

1. The emissions unit covered by this permit to install is one (1) 20.93 MMBtu natural gas and/or No. 2 fuel oil boiler (Boiler #10).
2. The emissions limit based on OAC Rule 3745-17-10 is less stringent than the limit established pursuant to OAC Rule 3745-31-05.
3. The emissions limit based on OAC Rule 3745-18-06 is less stringent than the limit established pursuant to OAC Rule 3745-31-05.

B. Operational Restrictions

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

1. Natural gas and/or No. 2 fuel oil shall only be used as fuel for this emissions unit.
2. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as received" basis:
 - a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 pound sulfur dioxide/MMBtu actual heat input; and,
 - b. greater than 140,000 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.
3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Ohio EPA, Northeast District Office.

D. Reporting Requirements

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

1. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
 - a. the total quantity of oil received in each shipment (gallons);
 - b. the weighted* average sulfur dioxide emission rate (pounds/MMBtu) for the oil received during the calendar month;
 - c. the weighted* average heat content (Btu/gallon) of the oil received during the calendar month;
 - d. the name of the oil supplier; and,
 - e. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.

* In proportion to the quantity of oil received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

E. Testing Requirements

1. **Emissions Limit:**

0.50 lb/MMBtu SO₂

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

Applicable Compliance Method:

To determine the actual emission rate for SO₂, the following equation shall be used:

$$E \text{ (lb/MMBtu)} = ((1 \times 10^6) / H) \times D \times S \times 1.974$$

Where: E = SO₂ emission rate, in lb/MMBtu

H = heat content of the liquid fuel, in Btu/gal.

D = density of the liquid fuel, in lb/gal.

S = decimal fraction of sulfur in the liquid fuel.

2. **Emissions Limit:**

45.8 tpy SO₂

Applicable Compliance Method:

Compliance shall be based on the recordkeeping and reporting requirements specified in Additional Special Terms and Conditions C and D.

3. **Emissions Limit:**

0.20 lb/MMBtu NO_x

Applicable Compliance Method:

U.S. EPA reference method 7 or 7E, if required by the Ohio EPA for fuel oil combustion. Emission factors outlined in AP-42, Section 1.4 for natural gas combustion.

4. **Emissions Limit:**

18.3 tpy NO_x

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

Applicable Compliance Method:

Annual emissions for burning oil and natural gas shall be summed. For fuel oil, use the results of emissions testing and recordkeeping requirements in Additional Special Terms and Conditions C. For natural gas, use emission factors outlined in AP-42, Section 1.4 and recordkeeping requirements in Additional Special Terms and Conditions C.

5. **Emissions Limit:**

0.09 lb/MMBtu CO

Applicable Compliance Method:

To determine the actual emission rate for CO, emission factors outlined in AP-42, Section 1.3 (Fuel Oil Combustion) or 1.4 (Natural Gas Combustion) shall be used.

6. **Emissions Limit:**

8.25 tpy CO

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements specified in Additional Special Terms and Conditions C and emission factors outlined in AP-42, Section 1.3 (Fuel Oil Combustion) or 1.4 (Natural Gas Combustion).

7. **Emissions Limit:**

0.020 lb/MMBtu Particulate Matter

Applicable Compliance Method:

To determine the actual emission rate for particulate matter, emission factors outlined in AP-42, Section 1.3 (Fuel Oil Combustion) or 1.4 (Natural Gas Combustion)

15

Facility Name: **J M SMUCKER COMPANY**

Application Number: **02-2082**

Date: **June 24, 1998**

shall be used.

8. **Emissions Limit:**

1.84 tpy Particulate Matter

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements specified in Additional Special Terms and Conditions C and emission factors outlined in AP-42, Section 1.3 (Fuel Oil Combustion) or 1.4 (Natural Gas Combustion).

9. **Emission Limit:**

5 Per Cent opacity

Applicable Compliance Method:

U.S. EPA reference method 9, if required by the Ohio EPA.