



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
CUYAHOGA COUNTY  
Application No: 13-03703**

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR 60 Subpart Dc	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE: 8/31/2000**

Stouffer Foods  
Bill Yeager  
5750 Harper Road  
Solon, OH 44139-1880

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 Review Appeals Commission 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 within thirty (30) days after the notice of the Directors 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

CBAPC



**FINAL PERMIT TO INSTALL 13-03703**

Application Number: 13-03703  
APS Premise Number: 1318537900  
Permit Fee: **\$800**  
Name of Facility: Stouffer Foods  
Person to Contact: Bill Yeager  
Address: 5750 Harper Road  
Solon, OH 44139-1880

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**5750 Harper Road  
Solon, Ohio**

Description of proposed emissions unit(s):  
**2 boilers rated at 72.22 MMBTU per hour which will be used for steam for process heat, process steam and comfort heating.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(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 emissions unit(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 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.

**10. 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.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. 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.

**13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>	
	<u>Fuel Burned</u>	<u>Natural</u> <u>Landfill</u>
VOC	3.5	1.52
SO2	0.38	11.92
PM	4.82	12.08
NOX	31.62	75.86
CO	53.12	8.40
HCL	-	17.26

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B018 - 72.22 MMBTU per hour boiler to utilize natural gas or landfill gas as fuel	OAC rule 3745-31-05(A)(3)	From burning Natural Gas VOC: 0.40 lb/hr and 1.75 tpy SO2: 0.043 lb/hr and 0.19 tpy PM: 0.55 lb/hr and 2.41 tpy NOX: 3.61 lbs/hr and 15.81 tpy CO: 6.06 lbs/hr and 26.56 tpy
	OAC rule 3745-17-07	From burning Landfill Gas VOC: 0.17 lb/hr and 0.76 tpy SO2: 1.36 lb/hr and 5.96 tpy PM: 1.38 lb/hr and 6.04 tpy NOX: 8.66 lbs/hr and 37.93 tpy CO: 0.96 lb/hr and 4.20 tpy HCL: 1.97 lb/hr and 8.63 tpy
	OAC rule 3745-17-10(B)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule  0.02 lb/MMBTU of PM Less stringent than emission limit established through OAC rule 3745-31-05(A)(3)
	OAC rule 3745-18-06(E)(1)	Emission limitation for SO2 less stringent than limit established through OAC rule 3745-31-05(A)(3)
	40 CFR Part 60 Subpart Dc	Emission limitations for SO2 and PM equal to limit established through OAC rule 3745-31-05(A)(3)

**2. Additional Terms and Conditions**

- 2.a** The emissions unit shall be designed and operated to reduce non-methane organic compounds (NMOC) by ninety-eight weight percent as required under OAC rule 3745-76-07(B)(2)(c)(ii).

**B. Operational Restrictions**

The permittee shall burn only natural gas and/or landfill gas in this emissions unit.

**C. Monitoring and/or Recordkeeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas and/or landfill gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permit to install for this emissions unit B018 was evaluated based on the actual materials and design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen Chloride

TLV (mg/m<sup>3</sup>): 7.46

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 64.49

MAGLC (ug/m<sup>3</sup>): 177.57

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- 3. As required by OAC rule 3745-76-13(B)(3), records of performance tests or monitoring shall be maintained for a minimum of five years. Records of the emissions units vendor specifications shall be maintained until removal.
  - 4. As required by OAC rule 3745-76-11(D), the permittee seeking to demonstrate compliance shall provide information satisfactory to the local air agency describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The local air agency shall review the information and either approve it, or request that additional information be submitted. The local air agency may specify additional appropriate monitoring procedures.

#### **D. Reporting Requirements**

The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **E. Testing Requirements**

Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1. From burning Natural Gas
  - a. Emission Limitation  
0.4 lb/hr VOC and 1.75 tpy VOC

Applicable Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for VOC (5.5 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- b. Emission Limitation  
0.043 lb/hr SO<sub>2</sub> and 0.19 tpy SO<sub>2</sub>

Applicable Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for SO<sub>2</sub> (0.6 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- c. Emission Limitation  
0.55 lb/hr PM and 2.41 tpy PM

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for PM (7.6 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- d. Emission Limitation  
3.61 lbs/hr NO<sub>X</sub> and 15.81 tpy NO<sub>X</sub>

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for NO<sub>X</sub> (50.0 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- e. Emission Limitation  
6.06 lbs/hr CO and 26.56 tpy CO

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for CO (84.0 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

2. From burning Landfill Gas

- a. Emission Limitation  
0.17 lb/hr VOC and 0.76 tpy VOC

Applicable Method

Compliance shall be based upon the following material balance:

$$\text{VOC material balance} = \{(\text{MW hexane} \times (\text{VOC concentration [ppmv]}/1,000,000 \times \text{scfh})\} / \{(R) \times (T) \times (1-0.98)\} \\ = \text{lb/hr}$$

This lb/hr total from the material balance is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- b. Emission Limitation  
1.36 lb/hr SO<sub>2</sub> and 5.96 tpy SO<sub>2</sub>

Applicable Method

Compliance shall be based upon the following material balance:

$$\text{SO}_2 \text{ material balance} = \{(\text{scfh}) \times (\text{total SO}_2 \text{ conc [ppmv]}/1,000,000 \times (\text{MW SO}_2))\} / \{(R) \times (T)\} = \text{lb/hr}$$

This lb/hr total from the material balance is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- c. Emission Limitation  
1.38 lb/hr PM and 6.04 tpy PM

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for PM (8.2 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- d. Emission Limitation  
8.66 lbs/hr NO<sub>x</sub> and 37.93 tpy NO<sub>x</sub>

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for NO<sub>x</sub> (51.56 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- e. Emission Limitation  
0.96 lbs/hr CO and 4.20 tpy CO

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for CO (5.7 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- f. Emission Limitation  
1.97 lb/hr HCL and 8.63 tpy HCL

Applicable Method

Compliance shall be based upon the following material balance:

$$\text{HCL material balance} = \{(\text{scfh}) \times (\text{total HCL conc [ppmv]}/1,000,000 \times (\text{MW HCL}))\}/\{(R)\times(T)\} = \text{lb/hr}$$

This lb/hr total from the material balance is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

3. Emission Limitation  
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

4. Emission Limitation  
0.020 lb/MMBTU PM

Applicable Compliance Method

See Term E.1.c above.

5. Emission Limitation  
40 CFR 60 Subpart Dc  
There were no limitations associated with this rule

Applicable Compliance Method

See Terms E.1.b, E.1.c, E.2.b, and E.2.c above.

6. Emission Limitation  
98% destruction efficiency of NMOC

**Stouffer Foods**

**PTI Application: 13-03703**

**Issued: 8/31/2000**

**Facility ID: 1318537900**

**Emissions Unit ID: B018**

**Applicable Compliance Method**

As required by OAC rule 3745-76-09(D), USEPA Method 25 or Method 18 of 40 CFR 60 Appendix A shall be used to demonstrate compliance. The following equation shall be used to calculate efficiency:

$$\text{Control efficiency} = (\text{NMOC in} - \text{NMOC out}) / (\text{NMOC in})$$

Where,

NMOC in = mass of NMOC entering control device

NMOC out = mass of NMOC exiting control device

**F. Miscellaneous Requirements**

This source is 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.

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  
Lazarus Government Building  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Cleveland Bureau of Air Pollution Control  
1925 St. Clair Avenue  
Cleveland, Ohio 44114

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B019 - 72.22 MMBTU per hour boiler to utilize natural gas or landfill gas as fuel	OAC rule 3745-31-05(A)(3)	From burning Natural Gas VOC: 0.40 lb/hr and 1.75 tpy SO2: 0.043 lb/hr and 0.19 tpy PM: 0.55 lb/hr and 2.41 tpy NOX: 3.61 lbs/hr and 15.81 tpy CO: 6.06 lbs/hr and 26.56 tpy
	OAC rule 3745-17-07	From burning Landfill Gas VOC: 0.17 lb/hr and 0.76 tpy SO2: 1.36 lb/hr and 5.96 tpy PM: 1.38 lb/hr and 6.04 tpy NOX: 8.66 lbs/hr and 37.93 tpy CO: 0.96 lb/hr and 4.20 tpy HCL: 1.97 lb/hr and 8.63 tpy
	OAC rule 3745-17-10(B)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule  0.02 lb/MMBTU of PM Less stringent than emission limit established through OAC rule 3745-31-05(A)(3)
	OAC rule 3745-18-06(E)(1)	Emission limitation for SO2 less stringent than limit established through OAC rule 3745-31-05(A)(3)
	40 CFR Part 60 Subpart Dc	Emission limitations for SO2 and PM equal to limit established through OAC rule 3745-31-05(A)(3)

**2. Additional Terms and Conditions**

- 2.a** The emissions unit shall be designed and operated to reduce non-methane organic compounds (NMOC) by ninety-eight weight percent as required under OAC rule 3745-76-07(B)(2)(c)(ii).

**B. Operational Restrictions**

The permittee shall burn only natural gas and/or landfill gas in this emissions unit.

**C. Monitoring and/or Recordkeeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas and/or landfill gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permit to install for this emissions unit B018 was evaluated based on the actual materials and design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen Chloride

TLV (mg/m3): 7.46

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.49

MAGLC (ug/m3): 177.57

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- 3. As required by OAC rule 3745-76-13(B)(3), records of performance tests or monitoring shall be maintained for a minimum of five years. Records of the emissions units vendor specifications shall be maintained until removal.
  - 4. As required by OAC rule 3745-76-11(D), the permittee seeking to demonstrate compliance shall provide information satisfactory to the local air agency describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The local air agency shall review the information and either approve it, or request that additional information be submitted. The local air agency may specify additional appropriate monitoring procedures.

#### **D. Reporting Requirements**

The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **E. Testing Requirements**

Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1. From burning Natural Gas
  - a. Emission Limitation  
0.4 lb/hr VOC and 1.75 tpy VOC

Applicable Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for VOC (5.5 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- b. Emission Limitation  
0.043 lb/hr SO<sub>2</sub> and 0.19 tpy SO<sub>2</sub>

Applicable Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for SO<sub>2</sub> (0.6 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- c. Emission Limitation  
0.55 lb/hr PM and 2.41 tpy PM

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for PM (7.6 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- d. Emission Limitation  
3.61 lbs/hr NO<sub>X</sub> and 15.81 tpy NO<sub>X</sub>

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for NO<sub>X</sub> (50.0 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- e. Emission Limitation  
6.06 lbs/hr CO and 26.56 tpy CO

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for CO (84.0 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

2. From burning Landfill Gas

- a. Emission Limitation  
0.17 lb/hr VOC and 0.76 tpy VOC

Applicable Method

Compliance shall be based upon the following material balance:

$$\text{VOC material balance} = \{(\text{MW hexane} \times (\text{VOC concentration [ppmv]}/1,000,000 \times \text{scfh})\} / \{(R) \times (T) \times (1-0.98)\} \\ = \text{lb/hr}$$

This lb/hr total from the material balance is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- b. Emission Limitation  
1.36 lb/hr SO<sub>2</sub> and 5.96 tpy SO<sub>2</sub>

Applicable Method

Compliance shall be based upon the following material balance:

$$\text{SO}_2 \text{ material balance} = \{(\text{scfh}) \times (\text{total SO}_2 \text{ conc [ppmv]}/1,000,000 \times (\text{MW SO}_2))\} / \{(R) \times (T)\} = \text{lb/hr}$$

This lb/hr total from the material balance is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- c. Emission Limitation  
1.38 lb/hr PM and 6.04 tpy PM

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for PM (8.2 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- d. Emission Limitation  
8.66 lbs/hr NO<sub>x</sub> and 37.93 tpy NO<sub>x</sub>

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for NO<sub>x</sub> (51.56 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- e. Emission Limitation  
0.96 lbs/hr CO and 4.20 tpy CO

Applicable Compliance Method

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (72.22 MMBTU/hr) by the AP-42 emission factor for CO (5.7 lb/MM scf). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- f. Emission Limitation  
1.97 lb/hr HCL and 8.63 tpy HCL

Applicable Method

Compliance shall be based upon the following material balance:

$$\text{HCL material balance} = \{(\text{scfh}) \times (\text{total HCL conc [ppmv]}/1,000,000 \times (\text{MW HCL}))\}/\{(R) \times (T)\} = \text{lb/hr}$$

This lb/hr total from the material balance is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the tpy emission rate.

- 3. Emission Limitation  
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

- 4. Emission Limitation  
0.020 lb/MMBTU PM

Applicable Compliance Method

See Term E.1.c above.

- 5. Emission Limitation  
40 CFR 60 Subpart Dc  
There were no limitations associated with this rule

Applicable Compliance Method

See Terms E.1.b, E.1.c, E.2.b, and E.2.c above.

- 6. Emission Limitation  
98% destruction efficiency of NMOC

**Stouffer Foods**

**PTI Application: 13-03703**

**Issued: 8/31/2000**

**Facility ID: 1318537900**

**Emissions Unit ID: B019**

**Applicable Compliance Method**

As required by OAC rule 3745-76-09(D), USEPA Method 25 or Method 18 of 40 CFR 60 Appendix A shall be used to demonstrate compliance. The following equation shall be used to calculate efficiency:

$$\text{Control efficiency} = (\text{NMOC in} - \text{NMOC out}) / (\text{NMOC in})$$

Where,

NMOC in = mass of NMOC entering control device

NMOC out = mass of NMOC exiting control device

**F. Miscellaneous Requirements**

This source is 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.

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  
Lazarus Government Building  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Cleveland Bureau of Air Pollution Control  
1925 St. Clair Avenue  
Cleveland, Ohio 44114

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03703

Facility ID: 1318537900

FACILITY NAME Stouffer Foods

FACILITY DESCRIPTION 2 boilers rated at 72.22 MMBTU per hour which will be used for steam for process heat, process steam and comfort heating CITY/TWP Solon

SIC CODE 2092 SCC CODE 3-02-036-01 EMISSIONS UNIT ID B018

EMISSIONS UNIT DESCRIPTION 72.22 MMBTU per hour boiler to utilize natural gas or landfill gas as fuel

DATE INSTALLED 5/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	nonattainment	nat gas 0.55 lb/hr landfill 1.38 lb/hr	2.41 6.04	nat gas 0.55 lb/hr landfill 1.38 lb/hr	2.41 6.04
PM <sub>10</sub>	nonattainment				
Sulfur Dioxide	nonattainment	nat gas 0.043 lb/hr landfill 1.36 lb/hr	0.19 5.96	nat gas 0.043 lb/hr landfill 1.36 lb/hr	0.19 5.96
Organic Compounds	attainment	nat gas 0.40 lb/hr landfill 0.17 lb/hr	1.75 0.76	nat gas 0.40 lb/hr landfill 0.17 lb/hr	1.75 0.76
Nitrogen Oxides	attainment	nat gas 3.61 lbs/hr landfill 8.66 lbs/hr	15.81 37.93	nat gas 3.61 lbs/hr landfill 8.66 lbs/hr	15.81 37.93
Carbon Monoxide	attainment	nat gas 6.06 lbs/hr landfill 0.96 lb/hr	26.56 4.20	nat gas 6.06 lbs/hr landfill 0.96 lb/hr	26.56 4.20
Lead					
Other: Air Toxics	unclassified	landfill 1.97 lb/hr	8.63	landfill 1.97 lb/hr	8.63

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR 60 Subpart Dc NESHAP? PSD? OFFSET POLICY?

Dc

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** The BAT determination for this source is compliance with the terms and conditions, rules and regulations and the Air Toxics Policy. The basis for the determination is knowledge of the source.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES NO

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03703

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FACILITY NAME Stouffer Foods

FACILITY DESCRIPTION 2 boilers rated at 72.22 MMBTU per hour which will be used for steam for process heat, process steam and comfort heating CITY/TWP Solon

IDENTIFY THE AIR CONTAMINANTS: Hydrogen Chloride (HCL)

**NEW SOURCE REVIEW FORM B**

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Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	nonattainment	nat gas 0.55 lb/hr landfill 1.38 lb/hr	2.41 6.04	nat gas 0.55 lb/hr landfill 1.38 lb/hr	2.41 6.04
PM <sub>10</sub>	nonattainment				
Sulfur Dioxide	nonattainment	nat gas 0.043 lb/hr landfill 1.36 lb/hr	0.19 5.96	nat gas 0.043 lb/hr landfill 1.36 lb/hr	0.19 5.96
Organic Compounds	attainment	nat gas 0.40 lb/hr landfill 0.17 lb/hr	1.75 0.76	nat gas 0.40 lb/hr landfill 0.17 lb/hr	1.75 0.76
Nitrogen Oxides	attainment	nat gas 3.61 lbs/hr landfill 8.66 lbs/hr	15.81 37.93	nat gas 3.61 lbs/hr landfill 8.66 lbs/hr	15.81 37.93
Carbon Monoxide	attainment	nat gas 6.06 lbs/hr landfill 0.96 lb/hr	26.56 4.20	nat gas 6.06 lbs/hr landfill 0.96 lb/hr	26.56 4.20
Lead					
Other: Air Toxics	unclassified	landfill 1.97 lb/hr	8.63	landfill 1.97 lb/hr	8.63

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR 60 Subpart Dc NESHAP? PSD? OFFSET POLICY?

Dc

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** The BAT determination for this source is compliance with the terms and conditions, rules and regulations and the Air Toxics Policy. The basis for the determination is knowledge of the source.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES NO

**NEW SOURCE REVIEW FORM B**

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IDENTIFY THE AIR CONTAMINANTS: Hydrogen Chloride

**NEW SOURCE REVIEW FORM B**

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FACILITY NAME Stouffer Foods

FACILITY DESCRIPTION 2 boilers rated at 72.22 MMBTU per hour which will be used for steam for process heat, process steam and comfort heating CITY/TWP Solon

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

<u>Please fill out the following. If the checkbox does not work, replace it with an 'X'</u>	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	1303703c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input checked="" type="checkbox"/>	1303703s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

**SUMMARY** (for informational purposes only)  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

Pollutant

Tons Per Year

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03703

Facility ID: 1318537900

FACILITY NAME Stouffer Foods

FACILITY DESCRIPTION	2 boilers rated at 72.22 MMBTU per hour which will be used for steam for process heat, process steam and comfort heating	CITY/TWP	Solon
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	Fuel Burned	
	Natural	Landfill
VOC	3.5	1.52
SO2	0.38	11.92
PM	4.82	12.08
NOX	31.62	75.86
CO	53.12	8.40
HCL	-	17.26