



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

October 6, 2016

CERTIFIED MAIL
91 7199 9991 7037 0982 6529

Mr. Dave Townsend
Vice President
Pilgrim's Pride Corporation
214 South Main Street
Moorefield, WV 26836

Re: Pilgrim's Pride Corporation
Moorefield Rendering Plant
Permit No. R13-1293F
Plant ID No. 031-00004

Dear Mr. Townsend:

Your application for an Administrative Update as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-1293F is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

As a result of the granting of this permit, the source is not subject to 45CSR30.

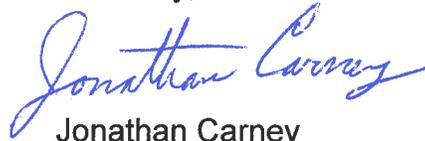
In accordance with 45CSR22 - Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the Certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Promoting a healthy environment.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1203.

Sincerely,



Jonathan Carney
Engineer

Enclosures

c: Barry Griffith, Senior Project Manager
Patrick Ward, Potesta & Associates

Permit to Update



R13- 1293F

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Pilgrim's Pride Corporation
Moorefield Facility
031-00004

A handwritten signature in blue ink, appearing to read "William F. Durham", written over a horizontal line.

William F. Durham
Director

Issued: October 6, 2016

This permit will supersede and replace Permit R13-1293E.

Facility Location: Moorefield, Hardy County, West Virginia
Mailing Address: 214 South Main Street, Moorefield, WV 26836
Facility Description: Rendering Plant
NAICS Codes: 311613
UTM Coordinates: 675.24 km Easting • 4,325.38 km Northing • Zone 17
Permit Type: Administrative Update
Description of Change: Replace scrubbers and remove high intensity odor combustion air requirement from the permit.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is not subject to 45CSR30.

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CERTIFICATION OF DATA ACCURACY

1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1E	Cleaver Brooks natural gas/No. 2 oil Fired Boiler	1991	33.5 MMBtu/hr	NA
2S	2E	Cleaver Brooks natural gas/No. 2 oil Fired Boiler	1991	33.5 MMBtu/hr	NA
3S	3E	Cleaver Brooks natural gas/No. 2 oil Fired Boiler	1991	33.5 MMBtu/hr	NA
4S	6E	Room Air of Raw Material Receiving	2016	NA	6C
5S	7E	Room Air of Waste Water	2016	NA	7C
6S	6E	Room Air of Rendering Proces	2016	NA	6C
7S	7E	Room Air of Feather Process	2016	NA	7C
8S	7E	Process Gas of Rendering Process	2016	NA	9C/8C/7C
9S	7E	Air Cooled Condensers (2)	2016	NA	9C/8C/7C
10S	7E	Ring Dryer	2016	7.5 MMBtu/hr	9C/8C/7C

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5 μm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10μm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	Pph	Pounds per Hour
DAQ	Division of Air Quality	Ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	Psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-1293E. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-1293, R13-1293A, R13-1293B, R13-1293C, R13-1293D, R13-1293E, R13-1293F, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling

connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information

includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:
Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. The total amount of material received for rendering shall not exceed 125,000 tons per year. All material shall consist of poultry by-products only. Records shall be kept showing the monthly amount of material received on a rolling yearly total. A rolling yearly total shall mean the sum of the material received at any given time for the previous twelve (12) consecutive calendar months. These records shall be maintained in accordance with Condition 3.4.1.
- 4.1.2. The emissions control equipment shall include the following as a minimum:
- a. High and Medium Intensity Odors

The following high and medium intensity odors shall be controlled by one stage of water venturi scrubbing plus two stages of odor control chemical scrubbing in series. One of these may be the building odor control scrubbing system:

 - 1. Offal (Meat) – Cooker non-condensable, cooker drainer screen, fat centrifuge, fat screen, Press discharge, milling cyclones.
 - 2. Feathers - ring dryers non-condensable, milling cyclones.
 - 3. Blood - ring dryers non-condensable, raw blood tank, centrifuge, serum water discharge.
 - b. Process Building Ventilation
 - 1. Conveyor odors shall be controlled by the room air system.

All processes, equipment and material shall be enclosed. All the odors from the enclosed process building shall be exhausted and controlled by one stage of odor control chemical scrubbing. There shall be no exception due to hot weather.
- 4.1.3. The raw material unloading area shall be enclosed and the odors from the area shall be vented to the plant for scrubbing along with the plant air. Vehicles shall be washed down in this area.
- 4.1.4. The ring dryer shall have temperature controls to prevent scorching of feathers and blood.
- 4.1.5. Air pollution control equipment shall be installed and operated to provide a negative flow of air from the rendering plant, such equipment to be installed and operated so as to capture fugitive odors resulting from the unloading of raw products. The outloading of finished product shall be performed within a building.
- 4.1.6. Odor emissions from the feather meal storage silo shall be ducted back to the plant interior where the gases shall be processed through chemical scrubbing with the plant air.
- 4.1.7. Small sniffer tubes shall be installed for ground level sniffing of the following exhausts:
- a. Each final exhaust stack to atmosphere, except boilers.
 - b. Following each odor control chemical scrubber that vents to the atmosphere.
- 4.1.8. All raw material truck storage areas and truck traffic areas outside the buildings shall be paved with a non-porous material to avoid malodorous contamination.
- 4.1.9. The only material that may be received at this plant shall be fresh poultry material that has not decomposed sufficiently to cause an objectionable odor.

- 4.1.10 All material received shall be processed or hauled away before it has decomposed sufficiently to cause an objectionable odor.
- 4.1.11 Vehicles used for hauling raw material and finished products (incoming and outgoing):
 - a. Shall be constructed and operated so as to prevent spillage, and covered to prevent exposure to odor-carrying air currents.
 - b. Loaded vehicles shall not be parked on the property for more than 120 minutes. (Incoming vehicles shall be clearly and distinctly "tagged" with the time of arrival at the plant site, using a method agreed upon by the Director). In the event a truck can not be unloaded within the 120 minute period, it must depart the plant site and not return with the same load. The raw material in the truck must be diverted to another rendering facility or otherwise be properly stored or disposed of in accordance with the plan noted in **Source-Specific Requirements 4.1.16** below.
 - c. Vehicles, upon being unloaded, shall be promptly water washed with high pressure sprays and deodorized prior to being parked or exiting the plant. The cleanup must be performed in the enclosed unloading area.
 - d. In those instances where incoming trucks are unable to unload immediately during the months of April, May, June, July, August, September and October; such vehicles shall be parked in the shade of the live shed area or inside the raw material receiving area of the rendering plant building during the 120 minute residence time.
 - e. A log shall be kept which identifies each truck and records the arrival times of each incoming truck, the time that the truck is unloaded and the time when washdown is completed. This log shall be available for review by appropriate Federal, State or County officials.
- 4.1.12 All building openings above ground, other than access doors, shall be sealed so as to prevent odorous emissions. Exterior doors shall be kept closed to further prevent the escape of fugitive odors. All man doors shall be equipped with automatic closure devices and maintained in good repair. The doors allowing access to the boiler rooms may be left partially open as a means of providing the additional oxygen needed for proper boiler combustion.
- 4.1.13 There shall be no ponded waters outside of the buildings except designated waste treatment ponds.
- 4.1.14 All spilled raw material shall be cleaned up immediately.
- 4.1.15 All spilled finished product shall be cleaned up promptly after loadout is completed.
- 4.1.16 The permittee shall prepare a malfunction abatement plan to prevent, detect, and correct malfunctions resulting in emissions exceeding any applicable emission limitation. The plan shall be submitted in writing to the DAQ thirty (30) days prior to initial startup of plant operations and shall specify all of the following:
 - a. A complete preventative maintenance program, including identification of the supervisory personnel responsible for overseeing the inspection-maintenance-repair of air cleaning devices, a description of the items or conditions that shall be inspected, and the frequency of these inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the process equipment and air-cleaning device operating variables that shall be monitored to detect a malfunction, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limitations.

- 4.1.17 A diversion plan for the handling of raw materials shall be prepared and submitted to the DAQ for approval thirty (30) days prior to initial startup of plant operations. The plan shall minimize the number of trucks on site loaded with raw materials and shall address the diversion of raw materials on site which can not be processed due to equipment shutdown and the diversion of loaded trucks on the way to the plant site. With respect to any raw material in the receiving bins, when equipment shutdown exceeds 24 hours, such material shall be physically removed from the plant and premises.
- 4.1.18 In the event that any piece of odor/air pollution control equipment is off line either for maintenance or for a malfunction, raw materials shall not be fed to the process unit served by this control equipment.
- 4.1.19 The permittee shall maintain and have available a listing of the names, addresses, and phone numbers of the persons who are accountable for the daily operation of the plant. A log shall be kept showing the dates and times that the equipment is down for repairs and shall be available for review by appropriate Federal, State and County officials.
- 4.1.20 If DAQ personnel investigates and determines that excessive odor exists, the DAQ may require that the raw materials no longer be fed to the process causing the odor. The remaining raw materials for this process and any incoming raw materials shall be diverted to another plant site until the problem is corrected. In the event the DAQ verifies the existence of stack emission odors in the community, which are determined to be caused by a downwash condition, the permittee shall exhaust emissions from the packed tower scrubbers through stacks of good engineering practice height.
- 4.1.21 The approved fuels for the boilers and ring dryers are natural gas, No. 2 fuel oil, and animal fat as described in Permit Application R13-1293D. A change in this fuel may require a permit to modify and operate. For the purposes of this permit, animal fat shall mean liquid combustible animal fat that is represented by the MSDS Sheet included with Permit Application R13-1293D.
- 4.1.22 Fuel consumption for each of the three Cleaver Brooks boilers is:

Type of Fuel	Hourly Quantity	Annual Quantity
Fuel Oil No. 2	210 gal/hr	4,188,000 gal/yr
Natural Gas	33,500 ft ³ /hr	587,000,000 ft ³ /yr
Animal Fat	243 gal/hr	1,811,594 gal/yr

A twelve month rolling average of yearly fuel consumption and fuel oil sulfur content shall be calculated monthly. These records shall be maintained in accordance with Condition 3.4.1.

4.1.23 Emissions from the operation of each of the three (3) Cleaver Brooks boilers shall not exceed the limitations specified below:

Emission Point ID#	Source	Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
1E	Cleaver Brooks Boiler 33.5 MMBTU/hr	Nitrogen Oxides	9.08	33.88
		Carbon Monoxide	0.94	3.50
		Particulate Matter-10	1.37	5.13
		Sulfur Dioxide	16.97	35.30
		Volatile Organic Compounds	0.17	0.63
2E	Cleaver Brooks Boiler 33.5 MMBTU/hr	Nitrogen Oxides	9.08	33.88
		Carbon Monoxide	0.94	3.50
		Particulate Matter-10	1.37	5.13
		Sulfur Dioxide	16.97	35.30
		Volatile Organic Compounds	0.17	0.63
3E	Cleaver Brooks Boiler 33.5 MMBTU/hr	Nitrogen Oxides	9.08	33.88
		Carbon Monoxide	0.94	3.50
		Particulate Matter-10	1.37	5.13
		Sulfur Dioxide	16.97	35.30
		Volatile Organic Compounds	0.17	0.63

4.1.24 **Limits on Rendering Process.** Emissions from the rendering process shall not exceed the limitations specified below:

85,000 Cubic Feet Per Minute Scrubber (6E)

<u>Pollutant</u>	<u>lb/hr</u>	<u>ton/yr</u>
TSP (PM ₁₀)	0.7	3.1
Volatile Organic Compounds	1.0	4.38
H ₂ S	2.0	7.88

85,000 Cubic Feet Per Minute Scrubber (7E)

<u>Pollutant</u>	<u>lb/hr</u>	<u>ton/yr</u>
TSP (PM ₁₀)	0.5	2.2
Volatile Organic Compounds	1.0	4.38
H ₂ S	2.0	7.88

4.1.25 Only two of the three 33.5 MMBTU/hr boilers may operate concurrently on high fire. One boiler may be in low fire (idle) condition. Daily records shall be kept showing the operating hours and firing conditions (i.e. High Fire or Low Fire) of the three permitted boilers. These records shall be maintained in accordance with Condition 3.4.1.

4.1.26 The maximum sulfur content of No. 2 fuel oil used to fire the permitted boilers shall not exceed 0.25%. Records of supplier certification for sulfur content shall be kept for every load of No. 2 fuel oil delivered to the permittee. These records shall be maintained in accordance with Condition 3.4.1.

4.1.27. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution

control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

The residence time, scrubber solution pH, and other parameters shall be properly maintained to prohibit odorous emissions. Records shall be kept on an hourly basis for the two 65,000 cfm scrubbers, recording pH, oxidant concentration, and operating temperature of the cooker. These records shall be maintained in accordance with Condition 3.4.1.

4.3. Testing Requirements

Within 180 days of startup, tests shall be conducted on the exhausts of the two large odor scrubbers to determine the rates of the emissions limited in Condition 4.1.26. The details of the test shall be arranged with the Director in accordance with **Facility Wide Requirement 3.3.1** of this permit.

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.5. Reporting Requirements

- 4.5.1. If, for any reason, the permitted facility or related air pollution control equipment fails or malfunctions and/or may cause excess emissions for more than one hour, the owner shall notify the DAQ by telephone or FAX within four (4) business hours. The rendering process equipment shall shut down immediately upon request of the DAQ. In addition, the owner shall provide a comprehensive written report explaining the problems or malfunctions and the estimated duration of the breakdown/shutdown.
- 4.5.2 The permittee shall notify the DAQ of its expected startup date in writing thirty (30) days prior to startup of plant operations and provide written notice of the actual date of startup within fifteen (15) days of such startup date.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name & Title _____ Title _____
(please print or type) Name

Telephone No. _____ Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.