

Mr. Les White  
United Signature Foods, LLC  
1800 Churchman Avenue  
Indianapolis, IN 46203

Re: First Minor Source Modification **097-12436-00137**

Dear Mr. White.:

United Signature Foods, LLC was issued Part 70 operating permit T097-6396-00137 on December 31, 1998 for for the operation of two (2) Cleaver Brooks Boilers, identified as Emission Units EU001 and EU002, with maximum rated capacity of 38 MMBtu/hr, installed in 1969. An application requesting changes to this permit was received on July 24, 2000. Pursuant to 326 IAC 2-7-10.5, the following emission unit is approved for construction at the source:

One (1)Hurst Series 400 boiler, installed in 2000, identified as EU001, maximum rated heat input capacity 29.4 MMBtu per hour, primarily combusting natural gas with No. 2 distillate oil as a back-up fuel. This unit has no control equipment and exhausts through a stack identified as S1.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC

6. Pursuant to 326 IAC 2-7-10.5(b), the emission unit constructed under this approval may be placed into operation to replace the existing boiler EU001.

The proposed operating conditions applicable to this emission unit are attached to this Source Modification approval. The source must comply with the requirements of 326 IAC 2-7-10.5(I)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Mr. Boris Gorlin at 317-327-2280.

Sincerely,

Mona A. Salem  
Chief Operating Officer  
Department of Public Works

cc: compliance - Matt Mosier  
Mindy Hahn  
file

Enclosure

BG

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1)Hurst Series 400 boiler, installed in 2000, identified as EU001, maximum rated heat input capacity 29.4 MMBtu per hour, primarily combusting natural gas with No. 2 distillate oil as a back-up fuel. This unit has no control equipment and exhausts through a stack identified as S1.
- (b) One(1) Cleaver Brooks boilers identified as EU002, primarily combusting natural gas with No. 2 distillate oil as a back-up fuel, maximum rated capacity of 38 mmBtu, installed in 1969. This unit has no control equipment and exhausts through a stack identified as S1.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boiler Emission Unit EU001 described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-2(a)(3)] [326 IAC 12-1]

- (a) Pursuant to 326 IAC 7-1.1-2(a)(3) (SO<sub>2</sub> Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):
  - (a) The SO<sub>2</sub> emissions from the 29.4 million Btu per hour Boiler, identified as emission unit EU001, shall not exceed five tenths (0.5) pounds per million Btu heat input; or
  - (2) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
  - (1) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.
- (b) Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the 38 mmBtu per hour boiler EU002 shall not exceed five tenths (0.5) pounds per mmBtu heat input when combusting distillate oil.

#### D.1.3 Particulate Matter [326 IAC 6-2]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from the 29.4 million Btu per hour boiler, identified as emission unit EU001, shall be limited to 0.365 pound per million Btu of heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{67.4^{0.26}} = 0.365,$$

Where Pt = Pounds of particulate matter emitted per million Btu of heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

- (b) Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of indirect Heating), the PM emissions from the 38 mmBtu per hour heat input boiler shall be limited to 0.435 pounds per mmBtu heat input.

Since this boiler was existing and in operation before June 8, 1972, the following equation was used to derive pounds per mmBtu:

$$Pt = \frac{0.87}{Q^{0.16}} = \frac{0.87}{76^{0.16}} = 0.435,$$

Where: Pt = Pounds of particulate matter emitted per million Btu ( lbs/mmBtu ) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test the boilers EU001 and EU002 by this permit. However, IDEM and ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM and ERMD, compliance with the Particulate Matter limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.6 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance with Condition D.1.2, utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
- (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
- (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the boilers EU001 and EU002, stack exhaust S1, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the boilers EU001 and EU002, stack S1.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.1.9 Reporting Requirements

A semi-annual summary of the information to document compliance with Conditions D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi annual reporting period.

**Indiana Department of Environmental Management  
Office of Air Management  
and  
Indianapolis Environmental Resources Management Division**

Technical Support Document (TSD) for a Part 70 Minor Source  
Modification.

**Source Background and Description**

<b>Source Name:</b>	<b>United Signature Foods, LLC</b>
<b>Source Location:</b>	<b>1800 Churchman Avenue, Indianapolis, Indiana, 46203</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>2099</b>
<b>Operation Permit No.:</b>	<b>T 097-6396-00137</b>
<b>Operation Permit Issuance Date:</b>	<b>December 31, 1998</b>
<b>First Minor Source Modification No:</b>	<b>097-12436-00137</b>
<b>Permit Reviewer:</b>	<b>Boris Gorlin</b>

The Indianapolis Environmental Resources Management Division (ERMD) has reviewed a modification application from the United Signature Foods, LLC relating to the construction of the following emission units and pollution control devices:

- (a) one (1) Hurst Series 400 Boiler with maximum rated capacity of 29.4 MMBtu/hr, primarily combusting natural gas with No. 2 distillate oil as a backup fuel, in replacement of the existing Cleaver Brooks Boiler Emission Unit EU001, with maximum rated capacity of 38 MMBtu/hr. Primary fuel - natural gas, with No.2 distillate oil as a backup fuel.

**History**

On December 31, 1998, the source was issued a Part 70 operating permit **T097-6396-00137** for the operation of two (2) Cleaver Brooks Boilers, identified as Emission Units EU001 and EU002, with maximum rated capacity of 38 MMBtu/hr, installed in 1969.

On July 24, 2000, United Signature Foods, LLC submitted an application to the ERMD requesting to replace the existing boiler EU001, maximum rated heat input capacity 38 MMBtu/hr, with a new boiler under the same Emission Unit ID # EU001, maximum rated heat input capacity 29.4 MMBtu/hr, primarily combusting natural gas with No. 2 distillate oil as a backup fuel.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 First Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 24, 2000.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (one page).

### Justification for Modification

The Part 70 operating permit T097-6396-00137 is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC-2-7-10.5(d)(6) as a modification that is subject to a new source performance standard (NSPS) which is the most stringent applicable requirement.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Maintenance
NO <sub>2</sub>	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for all the criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	<250
PM10	<250
SO <sub>2</sub>	<250
VOC	<250
CO	<250
NO <sub>x</sub>	<250

Single HAP	<10
Combination HAPs	<25

- (b) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (c) These emissions are based upon the Part 70 operating permit T097-6396-00137, issued on December 31, 1998.

**Potential to Emit of Modification**

The table below summarizes the potential to emit, reflecting all limits, of this modification. The control equipment is considered federally enforceable only after issuance of this Part 70 permit modification.

The sourcewide emissions limits after modification (Boiler EU001 replacement) will stay the same as in the original Part 70 operating permit T097-6396-00137.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
One (1) new Hurst Series 400 boiler, 29.4 MMBtu/hr	1.84	0.92	65.77	0.18	4.60	18.40	0

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

**Federal Rule Applicability**

The new 29.4 MMBtu Hurst Series 400 natural gas and No. 2 distillate oil fired boiler, identified as EU001, is subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc). The following limits and requirements from Subpart Dc apply:

- (a) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit of 0.5% by weight applies at all times, including periods of startup, shutdown, and malfunction for EU001.

The existing 38 MMBtu/hr boiler EU002 is not subject to NSPS due to date of construction (1969).

**State Rule Applicability**

Particulate Matter [326 IAC 6-2]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from the 29.4 million Btu per hour boiler, identified as emission unit EU001, shall be limited to 0.365 pound per million Btu of heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{67.4^{0.26}} = 0.365,$$

Where Pt = Pounds of particulate matter emitted per million Btu of heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

- (b) Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the ~~two (2)~~ 38 mmBtu per hour heat input boilers, **identified as emission unit EU002**, shall be limited to 0.435 pounds per mmBtu heat input.

Since the EU002 boiler was existing and in operation before June 8, 1972 the following equation was used to derive pounds per mmBtu:

$$Pt = \frac{0.87}{Q^{0.16}} = \frac{0.87}{76^{0.16}} = 0.435,$$

Where: Pt = Pounds of particulate matter emitted per million Btu ( lbs/mmBtu ) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

All the other State Rules applicable to the existing boilers EU001 and EU002 will be applicable to the new proposed boiler EU001. No other rules apply.

### Proposed Changes

The following changes were made in the Part 70 operating permit T097-6396-00137:

- (a) The condition A.2 (Emission Units and Pollution Control Equipment Summary) was modified to reflect replacement of the existing boiler EU001, 38 MMBtu/hr, with a proposed new boiler, 29.4 MMBtu/hr.
- (b) Section D.1 (Facility Operation Conditions) was changed to reflect replacement of the existing boiler EU001 with a proposed new boiler.

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) **One (1)Hurst Series 400 boiler, installed in 2000, identified as EU001, maximum rated heat input capacity 29.4 MMBtu per hour, and one (1) Cleaver Brooks boiler identified as EU002, maximum rated capacity of 38 mmBtu, installed in 1969, each boiler primarily combusting natural gas with Number 2 distillate oil as a backup fuel. These units have no control equipment and exhaust through a stack identified as S1.**

- ~~(a) Two (2) Cleaver Brooks boilers identified as EU001 and EU002, both units have a maximum rated capacity of 38 mmBtu and were installed in 1969. These units have no~~

~~control equipment and exhaust through stack S1.~~

## SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) **One (1) Hurst Series 400 boiler, installed in 2000, identified as EU001, maximum rated heat input capacity 29.4 MMBtu per hour, primarily combusting natural gas with No. 2 distillate oil as a back-up fuel. This unit has no control equipment and exhausts through a stack identified as S1.**
- (b) **One Two (2) Cleaver Brooks boilers identified as EU001 and EU002, primarily combusting natural gas with No. 2 distillate oil as a back-up fuel, ~~Both emissions units have a maximum rated capacity of 38 mmBtu, and were installed in 1969. This These units has have~~ no control equipment and exhausts through a stack identified as S1.**

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boiler Emission Unit EU001 described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-2(a)(3)] [326 IAC 12-1]

- (a) Pursuant to 326 IAC 7-1.1-2(a)(3) (SO<sub>2</sub> Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):
  - (a) The SO<sub>2</sub> emissions from the 29.4 million Btu per hour Boiler, identified as emission unit EU001, shall not exceed five tenths (0.5) pounds per million Btu heat input; or
  - (2) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
  - (1) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

#### D.1.3 ~~Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-2(a)(2)]~~

- (b) Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the ~~two (2)~~ ~~thirty-eight~~ 38 mmBtu per hour boilers EU002 shall not exceed five tenths (0.5) pounds per mmBtu heat input when combusting distillate oil.

#### D.1.4 **3 Particulate Matter [326 IAC 6-2-2]**

- (a) Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the ~~two (2)~~ 38 mmBtu per hour heat input boilers shall be limited to ~~0.435~~ **0.443** pounds per mmBtu heat input.

Since the boilers ~~was~~ were existing and in operation before June 8, 1972, the following equation was used to derive pounds per mmBtu:

$$Pt = \frac{0.87}{Q^{0.16}} = \frac{0.87}{76^{0.16}} = 0.435,$$

Where: Pt = Pounds of particulate matter emitted per million Btu ( lbs/mmBtu ) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

- (b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from the 29.4 million Btu per hour boiler, identified as emission unit EU001, shall be limited to 0.365 pounds per million Btu of heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{67.4^{0.26}} = 0.365,$$

Where Pt = Pounds of particulate matter emitted per million Btu of heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

## Compliance Determination Requirements

### D.1.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test the boilers EU001 and EU002 by this permit. However, IDEM and ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM and ERMD, compliance with the Particulate Matter limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### D.1.35 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance with Condition D.1.2, utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
  - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the boilers EU001 and EU002, stack exhaust S1, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) **In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) **A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) **The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.**

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.57 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report.

- (b) **To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the boilers EU001 and EU002, stack S1.**
- (b)(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.68 Reporting Requirements

A semi-annual summary of the information to document compliance with Conditions D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days

after the end of the semi-annual reporting period.

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 097-12436-00137.

## Appendix A: Emission Calculations

Company Name: **United Signature Foods, LLC**  
 Minor Source Modification No.: **097-12436-00137**  
 Part 70 Permit No.: **T097-6396-00137**  
 Reviewer: **Boris Gorlin**

## Unlimited and Limited Potential to Emit from Combustion - after modification

Source	Fuel Source	Consumption Units	mmbtu/hr Rating	Annual Hrs Operation	Annual Fuel Consumption	PM10 (Ton/Yr)	PM (Ton/Yr)	SO2 (Ton/Yr)	NOX (Ton/Yr)	VOC (Ton/Yr)	CO (Ton/Yr)
Boiler EU001	Nat gas	MMCF	29.4	8760.0	257.5	0.80	0.80	0.08	18.03	0.36	4.51
Boiler EU001	No. 2 oil	1000 gal	29.4	8760.0	1839.6	0.92	1.84	65.77	18.40	0.18	4.60
Boiler EU002	Nat gas	MMCF	38.0	8760.0	332.9	1.03	1.03	0.10	23.30	0.47	5.83
Boiler EU002	No. 2 oil	1000 gal	38.0	8760.0	2377.7	1.19	2.38	85.00	23.78	0.24	5.94
Total: <b>Natural Gas</b> , ton/yr						<b>1.83</b>	<b>1.83</b>	<b>0.18</b>	<b>41.33</b>	<b>0.83</b>	<b>10.33</b>
Total: <b>No. 2 oil</b> , ton/yr						<b>2.11</b>	<b>4.22</b>	<b>150.77</b>	<b>42.17</b>	<b>0.42</b>	<b>10.54</b>

**NOTE: Assume that the heating value of natural gas is 1000 Btu / Cubic Foot, distillate oil - 0.14 MMBtu / Gallon.**

	Distillate Oil No. 2 Emission Factors			Natural Gas Emission Factors			
	Lb/ 1000 Gallons			Rated Capacity 10-100 MMBtu/hr			
	No. 1 & 2	No. 4	Waste # 4*	< 10 *	10-100	> 100	
PM	2	7	61	Lb/ MMCF			
PM-10	1	6.02	51	PM	12	6.2	3
SO2	143	158	158	PM-10	12	6.2	3
NOx	20	20	16	SO2	0.6	0.6	0.6
VOC	0.2	0.2	0.1	NOx	100	140	550
CO	5	5	2.1	VOC	5.3	2.8	1.4
	Source: FIRE 5.0			CO	21	35	40
	Wt. % Ash = 1			Source: FIRE 5.0			
	Wt%Sulfur= 0.5						

SAMPLE CALCULATION:	$\frac{\text{MMCF}}{\text{YR}}$	X	$\frac{\text{LB}}{\text{MMCF}}$	X	$\frac{\text{TONS}}{\text{LB}}$	=	$\frac{\text{TONS}}{\text{YR}}$
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Note: Potential to Emit SO2 is greater than 25 tpy or 10 lb/hr. Therefore, facility is limited to 0.5 lb SO2 / MMBtu for distillate oil combustion (No. 2 oil).

## PTE before/after modification, ton/yr

Natural Gas	PM10	PM	SO2	NOx	VOC	CO
After Mod.	1.83	1.83	0.18	41.33	0.83	10.33
Existing Boilers	2.06	2.06	0.20	46.60	0.93	11.65
Em. Increase/Decrease	<b>-0.23</b>	<b>-0.23</b>	<b>-0.02</b>	<b>-5.27</b>	<b>-0.10</b>	<b>-1.32</b>

Dist. Oil No.2	PM/PM10	PM/PM10	SO2	NOx	VOC	CO
After Mod.	2.11	4.22	150.77	42.17	0.42	10.54
Existing Boilers	2.38	4.76	170.01	47.55	0.48	11.89
Em. Increase/Decrease	<b>-0.27</b>	<b>-0.54</b>	<b>-19.24</b>	<b>-5.38</b>	<b>-0.06</b>	<b>-1.35</b>