

Garry D. Lauber
Del Monte Foods
506 North Street
Plymouth, IN 46563-1022

Re: Registered Construction and Operation Status
099-13718-00009

Dear Mr. Lauber:

The application from Del Monte Foods, received on December 28, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the emission source, a food processing plant located at 506 North Street, Plymouth, IN 46563-1022, remains classified as registered. This emission source consists of the following facilities:

- (a) One (1) 25.1 MMBTU/hr natural gas fired boiler, identified as Boiler B01.
- (b) One (1) 12.56 MMBTU/hr natural gas fired boiler, identified as Boiler B02.
- (c) Three (3) cold cleaner degreasers.
- (d) Three (3) case coder printers, three (3) can coder printers, one (1) cap coder printer and one (1) roller coder printer.
- (e) Welding and flame cutting operations.

The following conditions shall be applicable:

- 1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- 2. The degreasers are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:
 - (a) equip the cleaner with a cover;
 - (b) equip the cleaner with a facility for draining cleaned parts;
 - (c) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) provide a permanent, conspicuous label summarizing the operating requirements;
 - (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

3. Pursuant to 326 IAC 6-2-4, particulate matter (PM) emissions from Boiler B01 shall be limited to 0.42 pounds per million British Thermal Units (lb/MMBTU) of heat input.
4. Pursuant to 326 IAC 6-2-3, particulate matter (PM) emissions from Boiler B02 shall be limited to 0.75 pounds per million British Thermal Units (lb/MMBTU) of heat input.
5. Pursuant to 326 IAC 12 and 40 CFR 60, monthly records of the amount of natural gas fuel combusted by Boiler B01 shall be made and the records shall be maintained for a period of two years from the date of each record.

This registration is the third air approval issued to this source. All prior approvals are now considered obsolete as they have been included in this registration.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

Any change or modification which may increase the potential pollutant emissions to 25 tons per year or more from the equipment covered in this registration must be approved by the Office of Air Quality (OAQ) before such change may occur.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ARD

cc: File - Marshall County
Marshall County Health Department
IDEM - Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Registration Annual Notification

. This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	Del Monte Foods
Address:	506 North Street
City:	Plymouth, IN 46563-1022
Authorized individual:	
Phone #:	
Registration #:	099-13718-00009

I hereby certify that Del Monte Foods is still in operation and is in compliance with the requirements of Registration 099-13718-00009.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Del Monte Foods
Source Location:	506 North Street, Plymouth, IN 46563-1022
County:	Marshall
SIC Code:	2033
Operation Permit No.:	099-4692-00009
Operation Permit Issuance Date:	October 4, 1995
Revision No.:	099-13718-00009
Permit Reviewer:	Allen R. Davidson

On December 28, 2000, the Office of Air Quality (OAQ) received an application from Del Monte Foods relating to the operation of a food processing plant located at 506 North Street, Plymouth, IN 46563-1022, remains classified as registered. This emission source consists of the following facilities:

- (a) One (1) 25.1 MMBTU/hr natural gas fired boiler, identified as Boiler B01.
- (b) One (1) 12.56 MMBTU/hr natural gas fired boiler, identified as Boiler B02.
- (c) Three (3) cold cleaner degreasers.
- (d) Three (3) case coder printers, three (3) can coder printers, one (1) cap coder printer and one (1) roller coder printer.
- (e) Welding and flame cutting operations.

History

Del Monte Foods was issued a registration for a canned food manufacturing plant on October 4, 1995. This application is the first revision since that date.

No operational changes are being made at the plant. However, 326 IAC 2-5.5-2(b) requires existing emission sources with a valid air registration to reapply for approval by December 2000. This application seeks to comply with this rule.

Enforcement Issues

There are no enforcement actions pending against this emission source.

Stack Summary

Stack information will not be changed as a result of this application

Recommendation

The staff recommends to the Commissioner that the application be approved as a registration. 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 December 28, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (4 pages)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential To Emit (tons/year)
PM	1.3
PM-10	1.3
SO ₂	0.1
VOC	4.23
CO	13.9
NO _x	16.5

HAP	Potential To Emit (tons/year)
TOTAL	<3.33

The potential to emit nitrogen oxides (NO_x) and carbon monoxide (CO) are each less than 25 tons per year, but both are greater than ten tons per year. Therefore, the existing source is classifiable as a registration under 326 IAC 2-5.5.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone.

Marshall County has been classified as attainment or unclassifiable for all other pollutants. Therefore, emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

The potential to emit every attainment pollutant 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

Boiler B01, constructed in July 1991, is subject to 326 IAC 12 and 40 CFR 60 (New Source Performance Standards)(NSPS). This rule requires the source to record monthly the amount of natural gas fuel combusted and to maintain the records for a period of two years from the date of each record.

Boiler B02, constructed in 1959, predates the applicability of 326 IAC 12 and 40 CFR 60 .

NSPS Subpart QQ is not applicable since the coder printers do not conform to the definition of a rotogravure printing press under 40 CFR 60.431.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR 63) applicable to this source. NESHAP Subpart T is not applicable since the degreasers do not use halogenated solvents.

NESHAP Subpart KK is not applicable since:

- (a) the source is not classified as a major HAP source, and it does not require synthetic limits to be a minor HAP source.
- (b) the coder printers do not conform to the definition of a rotogravure printing press or a flexographic printing press under 40 CFR 63.822.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source does not have potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it does not have the potential to emit more than one hundred (100) tons per year of any pollutant specified in the rule.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Boiler B01

326 IAC 6-2 (Particulate Emission Limitations For Sources of Indirect Heating)

This facility is subject to 326 IAC 6-2-4. Pursuant to 326 IAC 6-2-4, particulate matter (PM) emissions shall be limited by an equation which provides a limit of 0.42 pounds per million British Thermal Units of heat input. See Appendix A for detailed calculations. (4 pages)

State Rule Applicability - Boiler B02

326 IAC 6-2 (Particulate Emission Limitations For Sources of Indirect Heating)

This facility is subject to 326 IAC 6-2-3. Pursuant to 326 IAC 6-2-3, particulate matter (PM) emissions shall be limited by an equation which provides a limit of 0.75 pounds per million British Thermal Units of heat input. See Appendix A for detailed calculations. (4 pages)

State Rule Applicability - Cold Cleaner Degreasers

326 IAC 8-3 (Organic Solvent Degreasing Operations)

This facility is subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

- (c) equip the cleaner with a cover;
- (d) equip the cleaner with a facility for draining cleaned parts;
- (e) close the degreaser cover whenever parts are not being handled in the cleaner;
- (f) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (g) provide a permanent, conspicuous label summarizing the operating requirements;
- (h) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

This facility is not subject to 326 IAC 8-3-5 since the degreasers contain solvent reservoirs. Also, two of the three degreasers were existing as of July 1990.

State Rule Applicability - Various Coder Printers

326 IAC 8-5-5 (Graphic Arts Operations)

This source is not subject to 326 IAC 8-5-5 (Graphic Arts Operations) since:

- (a) the source's VOC potential emissions do not exceed 25 tons per year; and
- (b) the printers do not conform to the definition of packaging rotogravure printing or flexographic printing under 326 IAC 8-5-5.

326 IAC 8-2 (Surface Coating Emission Limitations)

These emission units are not subject to 326 IAC 8-2. Pursuant to 326 IAC 8-2-1 (Applicability), the rule is not applicable since the volatile organic compound (VOC) emissions are less than 15 pounds per day before controls.

326 IAC 8-1-6 (General VOC Reduction Requirements)

These emission units are not subject to 326 IAC 8-1-6 (General Reduction Requirements) because the potential to emit volatile organic compounds is less than twenty-five (25) tons per year. Therefore, the BACT (best available control technology) requirements do not apply.

State Rule Applicability - Welding and Flame Cutting Operations

These operations are classifiable as insignificant activities under 326 IAC 2-7-1. Emissions are assumed to be negligible.

Conclusion

The operation of these facilities shall be subject to the conditions of the attached registration, No 099-13718-00009.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Del Monte Foods
Address City IN Zip: 506 North Street, Plymouth, IN 46563-1022
ID: 099-13718-00009
Reviewer: Allen R. Davidson
Date: 02/19/01

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
37.660	329.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	1.3	0.1	16.5	0.9	13.9

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-02 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

HAPs Emissions

Company Name: Del Monte Foods
Address City IN Zip: 506 North Street, Plymouth, IN 46563-1022
ID: 099-13718-00009
Reviewer: Allen R. Davidson
Date: 12/18/00

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.464E-04	1.979E-04	1.237E-02	2.969E-01	5.608E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.248E-05	1.814E-04	2.309E-04	6.268E-05	3.464E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.