



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 19, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Marburger Foods, Inc. / MSOP 103-19206-00035

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Marburger Foods, Inc.
3311 State Road 19 South
Peru, Indiana 46970**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 103-19206-00035	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 19, 2004 Expiration Date: August 19, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationery meat processing plant.

Authorized Individual:	Safety & Compliance Manager
Source Address:	3311 State Road 19 South, Peru, IN 46970
Mailing Address:	3311 State Road 19 South, Peru, IN 46970
General Source Phone:	(765) 473-3086
SIC Code:	2011, 2013
County Location:	Miami
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

Plant 1 Building:

- (a) One (1) natural gas fired boiler, identified as 2064, with a maximum heat input capacity of 10.461 MMBtu per hour, constructed in 1992 and exhausting through stack 1.
- (b) One (1) natural gas fired boiler, identified as Hurst boiler, with a maximum heat input capacity of 10.50 MMBtu per hour, constructed in 1998 and exhausting through stack 2.
- (c) Three (3) natural gas fired office furnaces with each one rated at maximum heat input capacity of 0.06, 0.06, and 0.115 MMBtu per hour.
- (d) Eight (8) natural gas fired room space heaters with each one rated at maximum heat input capacity of 0.08, 0.126, 0.10, 0.075, 0.10, 0.10, 0.132 and 0.132 MMBtu per hour.
- (e) Two (2) natural gas fired room Accuair units with each one rated at maximum heat input capacity of 2.82 MMBtu per hour.
- (f) Five (5) Peru Microwave ovens with no natural gas fired pre-heaters, identified as #3 through #7.
- (g) Three (3) natural gas fired Dixon Microwave ovens, identified as #8 through #10, each equipped with natural gas fired preheater rated at 0.8 MMBtu per hour.
- (h) One (1) Dixon Microwave oven with no natural gas fired pre-heaters, identified as #11.

Plant 3 Building:

- (i) One (1) natural gas fired boiler, identified as 251866, with a maximum heat input capacity of 4.185 MMBtu per hour, constructed in 1996 and exhausting to stack 3.
- (j) Three (3) natural gas fired area furnaces with each one rated at maximum heat input capacity of 0.12, 0.175, and 0.80 MMBtu per hour.
- (k) Three (3) natural gas fired water heater with each one rated at maximum heat input capacity of 2.3 MMBtu per hour.
- (l) Two (2) Peru Microwave ovens with no natural gas fired pre-heaters, identified as #1 and #2.
- (m) One (1) natural gas fired Accuair unit rated at maximum heat input capacity of 3.46 MMBtu per hour.

Wastewater Building

- (n) One (1) natural gas fired pallet shop heater rated at maximum heat input capacity of 0.25 MMBtu per hour.
- (o) One (1) natural gas fired space heater rated at maximum heat input capacity of 0.165 MMBtu per hour.
- (p) One (1) natural gas fired water heater rated at maximum heat input capacity of 0.20 MMBtu per hour.

Dry Goods Warehouse

- (q) One (1) natural gas fired shop furnace rated at maximum heat input capacity of 0.30 MMBtu per hour.

Pork Belly Processing Plant:

- (r) One (1) natural gas fired hot water heater rated at maximum heat input capacity of 18.0 MMBtu per hour.
- (s) Two (2) batch smokehouses, identified as #1 and #2, each equipped with a 3.50 MMBtu per hour natural gas-fired furnace and having a maximum throughput capacity of 6,912 pounds of pork bellies per hour and 24.0 pounds of wood chips per hour. Combustion and smokehouse emissions are exhausted through stacks 4 and 5.
- (t) Six (6) batch smokehouses, identified as #3 through #8, each equipped with a 3.50 MMBtu per hour natural gas-fired furnace and having a maximum throughput capacity of 6,912 pounds of pork bellies per hour with no wood chips usage. Combustion and smokehouse emissions are exhausted through stacks 6 through 11.
- (u) Six (6) natural gas fired Accuair Units with each one rated at maximum heat input capacity of 4.59 MMBtu per hour.
- (v) Three (3) natural gas fired air make up units with each one rated at maximum heat input capacity of 0.3, 1.5 and 1.5 MMBtu per hour.

Facility wide:

- (w) One (1) aboveground diesel storage tank with a maximum storage capacity of 500 gallons.
- (x) One (1) aboveground used hydraulic oil storage tank with a maximum storage capacity of 500 gallons.
- (y) Two (2) aboveground liquid nitrogen storage tanks with each one having a maximum storage capacity of 9,000 gallons.
- (z) One (1) aboveground glycol storage tank with a maximum storage capacity of 1,000 gallons.
- (aa) One (1) aboveground wastewater pretreatment equalization tank with a maximum storage capacity of 166,000 gallons.
- (bb) One (1) aboveground wastewater pretreatment sludge tank with a maximum storage capacity of 197,000 gallons.
- (cc) One (1) aboveground wastewater pretreatment activated sludge tank with a maximum storage capacity of 266,000 gallons.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit 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.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.7 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.8 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.9 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.10 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1 Building:

- (a) One (1) natural gas fired boiler, identified as 2064, with a maximum heat input capacity of 10.461 MMBtu per hour, constructed in 1992 and exhausting through stack 1.
- (b) One (1) natural gas fired boiler, identified as Hurst boiler, with a maximum heat input capacity of 10.50 MMBtu per hour, constructed in 1998 and exhausting through stack 2.
- (c) Three (3) natural gas fired office furnaces with each one rated at maximum heat input capacity of 0.06, 0.06, and 0.115 MMBtu per hour.
- (d) Eight (8) natural gas fired room space heaters with each one rated at maximum heat input capacity of 0.08, 0.126, 0.10, 0.075, 0.10, 0.10, 0.132 and 0.132 MMBtu per hour.
- (e) Two (2) natural gas fired room Accuair units with each one rated at maximum heat input capacity of 2.82 MMBtu per hour.
- (f) Five (5) Peru Microwave ovens with no natural gas fired pre-heaters, identified as #3 through #7.
- (g) Three (3) natural gas fired Dixon Microwave ovens, identified as #8 through #10, each equipped with natural gas fired preheater rated at 0.8 MMBtu per hour.
- (h) One (1) Dixon Microwave oven with no natural gas fired pre-heaters, identified as #11.

Plant 3 Building:

- (i) One (1) natural gas fired boiler, identified as 251866, with a maximum heat input capacity of 4.185 MMBtu per hour, constructed in 1996 and exhausting to stack 3.
- (j) Three (3) natural gas fired area furnaces with each one rated at maximum heat input capacity of 0.12, 0.175, and 0.80 MMBtu per hour.
- (k) Three (3) natural gas fired water heater with each one rated at maximum heat input capacity of 2.3 MMBtu per hour.
- (l) Four (4) natural gas fired Microwave oven preheaters with each one rated at maximum heat input capacity of 0.04 MMBtu per hour.
- (m) One (1) natural gas fired Accuair unit rated at maximum heat input capacity of 3.46 MMBtu per hour.

Wastewater Building

- (n) One (1) natural gas fired pallet shop heater rated at maximum heat input capacity of 0.25 MMBtu per hour.
- (o) One (1) natural gas fired space heater rated at maximum heat input capacity of 0.165 MMBtu per hour.
- (p) One (1) natural gas fired water heater rated at maximum heat input capacity of 0.20 MMBtu per hour.

Dry Goods Warehouse

- (q) One (1) natural gas fired shop furnace rated at maximum heat input capacity of 0.30 MMBtu per hour.

Pork Belly Processing Plant:

- (r) One (1) natural gas fired hot water heater rated at maximum heat input capacity of 18.0 MMBtu per hour.
- (s) Two (2) batch smokehouses, identified as #1 and #2, each equipped with a 3.50 MMBtu per hour natural gas-fired furnace and having a maximum throughput capacity of 6,912 pounds of pork bellies per hour and 24.0 pounds of wood chips per hour. Combustion and smokehouse emissions are exhausted through stacks 4 and 5.
- (t) Six (6) batch smokehouses, identified as #3 through #8, each equipped with a 3.50 MMBtu per hour natural gas-fired furnace and having a maximum throughput capacity of 6,912 pounds of pork bellies per hour with no wood chips usage. Combustion and smokehouse emissions are exhausted through stacks 6 through 11.
- (u) Six (6) natural gas fired Accuair Units with each one rated at maximum heat input capacity of 4.59 MMBtu per hour.
- (v) Three (3) natural gas fired air make up units with each one rated at maximum heat input capacity of 0.3, 1.5 and 1.5 MMBtu per hour.

Facility wide

- (w) One (1) aboveground diesel storage tank with a maximum storage capacity of 500 gallons.
- (x) One (1) aboveground used hydraulic oil storage tank with a maximum storage capacity of 500 gallons.
- (y) Two (2) aboveground liquid nitrogen storage tanks with each one having a maximum storage capacity of 9,000 gallons.
- (z) One (1) aboveground glycol storage tank with a maximum storage capacity of 1,000 gallons.
- (aa) One (1) aboveground wastewater pretreatment equalization tank with a maximum storage capacity of 166,000 gallons.
- (bb) One (1) aboveground wastewater pretreatment sludge tank with a maximum storage capacity of 197,000 gallons.
- (cc) One (1) aboveground wastewater pretreatment activated sludge tank with a maximum storage capacity of 266,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating: Emission Limitations for Facilities Specified in 326 IAC 6-2-1 (c)), particulate emissions from the 10.461, 4.185 and 10.50 MMBtu per hour heat input boiler shall be limited to 0.592, 0.542 and 0.471 pounds per MMBtu heat input, respectively.

The limit was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

Where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum heat input capacity in MMBtu/hr

D.1.2 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [326 IAC 12-1] [40 CFR 60, Subpart Dc]

The 10.461 and 10.50 MMBtu per hour boilers are subject to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). Pursuant to 40 CFR 60.48c(g), the Permittee shall keep records of the amounts of each fuel combusted during each day.

D.1.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable particulate emission rate from smokehouses #1 and #2 shall not exceed 9.41 pounds per hour each when operating at a process weight rate of 3.456 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.5 Natural Gas

In order to demonstrate compliance with D.1.1 and D.1.2, the source shall burn only natural gas.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall record and maintain records for a period of two years of the amounts of natural gas combusted during each day in the two (2) boilers.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Marburger Foods, Inc.
Address:	3311 State Road 19 South
City:	Peru
Phone #:	(765) 473-3086
MSOP #:	103-19206-00035

I hereby certify that Marburger Foods, Inc. is still in operation.
 no longer in operation.

I hereby certify that Marburger Foods, Inc. is in compliance with the requirements of MSOP 103-19206-00035.
 not in compliance with the requirements of MSOP 103-19206-00035.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a New Source Construction and Minor Source
Operating Permit

Source Background and Description

Source Name:	Marburger Foods, Inc.
Source Location:	3311 State Road 19 South, Peru, IN 46970
County:	Miami
SIC Code:	2013
Operation Permit No.:	MSOP 103-19206-00035
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed an application from Marburger Foods, Inc. relating to the construction and operation of smokehouses and several natural gas fired combustion units at the existing meat processing plant.

Source Definition

This existing meat processing plant was issued a Registration permit (No. 103-10760-00035). The source has requested the transition of this facility's existing Registration to Minor Source Operating Permit (MSOP). The issuance of a MSOP is necessary due to several large natural gas combustion units being installed at the facility as part of a facility expansion. In addition, the source has requested to revert back to its former company name Marburger Foods, Inc.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Plant 1 Building:

- (a) One (1) natural gas fired boiler, identified as 2064, with a maximum heat input capacity of 10.461 MMBtu per hour, constructed in 1992 and exhausting through stack 1.
- (b) One (1) natural gas fired boiler, identified as Hurst boiler, with a maximum heat input capacity of 10.50 MMBtu per hour, constructed in 1998 and exhausting through stack 2.
- (c) Three (3) natural gas fired office furnaces with each one rated at maximum heat input capacity of 0.06, 0.06, and 0.115 MMBtu per hour.
- (d) Eight (8) natural gas fired room space heaters with each one rated at maximum heat input capacity of 0.08, 0.126, 0.10, 0.075, 0.10, 0.10, 0.132 and 0.132 MMBtu per hour.
- (e) Two (2) natural gas fired room Accuair units with each one rated at maximum heat input capacity of 2.82 MMBtu per hour.
- (f) Five (5) Peru Microwave ovens with no natural gas fired pre-heaters, identified as #3 through #7.

Plant 3 Building:

- (g) One (1) natural gas fired boiler, identified as 251866, with a maximum heat input capacity of 4.185 MMBtu per hour, constructed in 1996 and exhausting to stack 3.
- (h) Three (3) natural gas fired area furnaces with each one rated at maximum heat input capacity of 0.12, 0.175, and 0.80 MMBtu per hour.
- (i) Three (3) natural gas fired water heater with each one rated at maximum heat input capacity of 2.3 MMBtu per hour.
- (j) Two (2) Peru Microwave ovens with no natural gas fired pre-heaters, identified as #1 and #2.
- (k) One (1) natural gas fired Accuair unit rated at maximum heat input capacity of 3.46 MMBtu per hour.

Wastewater Building

- (l) One (1) natural gas fired pallet shop heater rated at maximum heat input capacity of 0.25 MMBtu per hour.
- (m) One (1) natural gas fired space heater rated at maximum heat input capacity of 0.165 MMBtu per hour.
- (n) One (1) natural gas fired water heater rated at maximum heat input capacity of 0.20 MMBtu per hour.

Dry Goods Warehouse

- (o) One (1) natural gas fired shop furnace rated at maximum heat input capacity of 0.30 MMBtu per hour.

Facility wide

- (p) One (1) aboveground diesel storage tank with a maximum storage capacity of 500 gallons.
- (q) One (1) aboveground used hydraulic oil storage tank with a maximum storage capacity of 500 gallons.
- (r) Two (2) aboveground liquid nitrogen storage tanks with each one having a maximum storage capacity of 9,000 gallons.
- (s) One (1) aboveground glycol storage tank with a maximum storage capacity of 1,000 gallons.
- (t) One (1) aboveground wastewater pretreatment equalization tank with a maximum storage capacity of 166,000 gallons.
- (u) One (1) aboveground wastewater pretreatment sludge tank with a maximum storage capacity of 197,000 gallons.
- (v) One (1) aboveground wastewater pretreatment activated sludge tank with a maximum storage capacity of 266,000 gallons.

New Emission Units and Pollution Control Equipment

The source consists of the following new emission units and pollution control devices:

Plant 1 Building:

- (a) Three (3) natural gas fired Dixon Microwave ovens, identified as #8 through #10, each equipped with natural gas fired preheater rated at 0.8 MMBtu per hour.
- (b) One (1) Dixon Microwave oven with no natural gas fired pre-heaters, identified as #11.

Pork Belly Processing Plant:

- (c) One (1) natural gas fired hot water heater rated at maximum heat input capacity of 18.0 MMBtu per hour.
- (c) Two (2) batch smokehouses, identified as #1 and #2, each equipped with a 3.50 MMBtu per hour natural gas-fired furnace and having a maximum throughput capacity of 6,912 pounds of pork bellies per hour and 24.0 pounds of wood chips per hour. Combustion and smokehouse emissions are exhausted through stacks 4 and 5.
- (d) Six (6) batch smokehouses, identified as #3 through #8, each equipped with a 3.50 MMBtu per hour natural gas-fired furnace and having a maximum throughput capacity of 6,912 pounds of pork bellies per hour with no wood chips usage. Combustion and smokehouse emissions are exhausted through stacks 6 through 11.
- (e) Six (6) natural gas fired Accuair Units with each one rated at maximum heat input capacity of 4.59 MMBtu per hour.
- (f) Three (3) natural gas fired air make up units with each one rated at maximum heat input capacity of 0.3, 1.5 and 1.5 MMBtu per hour.

Existing Approvals

The source has been operating under previous approvals including the following:

- (a) Registration No.: 103-10760-00035, issued on May 3, 1999.
- (b) Notice Only Change No.: 103-10760-00035, issued on April 30, 2001.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation 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 May 18, 2004, with additional information received on June 7, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (eight (8) pages).

Potential to Emit (of the Source or Revision) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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 department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	6.60
PM-10	9.68
SO ₂	0.32
VOC	7.61
CO	45.41
NO _x	54.07

HAPs	Potential to Emit (tons/yr)
Hexane	0.98
Others	0.04
Total	1.02

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Miami County.

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

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Miami County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	6.60
PM-10	9.68
SO ₂	0.32
VOC	7.61
CO	45.41
NO _x	54.07
Single HAP	0.98
Combination HAPs	1.02

- (a) 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 greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on emission calculations derived from information provided in the application submitted by the Marburger Foods, Inc. on May 18, 2004.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 103-19206-00035, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) The two (2) natural gas fired boilers, identified as 2064 and Hurst boiler, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units") because each one was constructed after June 9, 1989, and has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since each boiler only combusts natural gas, it is subject only to the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping and reporting requirements are as follows:
 - (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.
- (b) One (1) natural gas fired boiler, identified as 251866, constructed in 1990 and rated at 4.185 MMBtu per hour is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (c) This source is not subject to the requirements of the National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters, 326 IAC 20, (40 CFR Part 63.75, Subpart DDDDD), because single HAP and total HAPs potential emission from the source are less than 10 and 25 tons per year, respectively.
- (d) The two (2) 500 gallon storage tanks storing diesel and hydraulic oil, two (2) 9,000 gallon storage tanks storing liquid nitrogen, and one (1) 1,000 gallon tank storing glycol are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a 115a or 110b 117b, as Subparts K, Ka, and Kb, respectively) since the storage capacity of each tank is below the minimum applicable threshold to the three rules (i.e., 40 cubic meters (10,568 gallons)).
- (d) The three (3) storage tanks related to wastewater pretreatment having a storage capacity of 166,000, 197,000, and 266,000 gallons are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a 115a or 110b 117b, as Subparts K, Ka, and Kb, respectively) since these tanks do not store a petroleum liquid as defined in the rule.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to this rule because potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

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

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. The source emits less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Miami County and the potential to emit for each of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (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 – Individual Facilities

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

This source does not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The allowable particulate emission rate from smokehouses #1 and #2 shall not exceed 9.41 pounds per hour each when operating at a process weight rate of 3.456 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (3.456)^{0.67} = 9.41 \text{ lb PM/hr};$$

The estimated particulate emissions for each smokehouse (#1 and #2) (see page 8 of Appendix A) is less than 9.41 lb PM/hr. Therefore, the source will be in compliance with 326 IAC 6-3-2.

Other six (6) smokehouses (#3 through #8) do not use wood chips to smoke meat and therefore do not emit any particulate emissions.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The three (3) natural gas fired boilers rated 10.461, 4.185 and 10.50 MMBtu/hr, installed in 1992, 1996 and 1998, respectively, are subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

For 10.461 MMBtu/hr boiler:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. operation capacity rating = 10.461 MMBtu/hr

$$Pt = 1.09/10.461^{0.26} = 0.592 \text{ lbs PM/MMBtu}$$

compliance calculation:

$$\text{Potential PM emissions for 10.461 MMBtu/hr boiler} = 1.9 \text{ lb PM/MMCF} * (1/1000) \text{ (MMCF/MMBtu)} \\ = 0.0019 \text{ lbs PM/MMBtu}$$

Potential PM emissions for the 10.461 MMBtu boiler (0.0019 lbs PM/MMBtu) is less than allowable 0.592 lbs PM/MMBtu, therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

For 4.185 MMBtu/hr boiler:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. operation capacity rating = 10.461+4.185 = 14.646 MMBtu/hr

$$Pt = 1.09/14.646^{0.26} = 0.542 \text{ lbs PM/MMBtu}$$

compliance calculation:

$$\text{Potential PM emissions for 4.185 MMBtu/hr boiler} = 1.9 \text{ lb PM/MMCF} * (1/1000) \text{ (MMCF/MMBtu)} \\ = 0.0019 \text{ lbs PM/MMBtu}$$

Potential PM emissions for the 4.185 MMBtu boiler (0.0019 lbs PM/MMBtu) is less than allowable 0.542 lbs PM/MMBtu, therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

For 10.50 MMBtu/hr boiler:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. operation capacity rating = 10.461+4.185+10.50 = 25.146 MMBtu/hr

$$Pt = 1.09/25.146^{0.26} = 0.471 \text{ lbs PM/MMBtu}$$

compliance calculation:

$$\text{Potential PM emissions for 10.50 MMBtu/hr boiler} = 1.9 \text{ lb PM/MMCF} * (1/1000) \text{ (MMCF/MMBtu)} \\ = 0.0019 \text{ lbs PM/MMBtu}$$

Potential PM emissions for the 10.50 MMBtu boiler (0.0019 lbs PM/MMBtu) is less than allowable 0.471 lbs PM/MMBtu, therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

326 IAC 9-1-2 (Carbon Monoxide Emission Rules)

There are no standards applicable for natural gas combustion units for carbon monoxide emissions. Therefore, the rule 326 IAC 9-1 is not applicable.

Conclusion

The construction and operation of this meat processing plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 103-19206-00035.

Indiana Department of Environmental Management

Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Marburger Foods, Inc.
Source Location:	3311 State Road 19 South, Peru, IN 46970
County:	Miami
SIC Code:	2013
Operation Permit No.:	MSOP 103-19206-00035
Permit Reviewer:	Adeel Yousuf / EVP

On July 5, 2004, the Office of Air Quality (OAQ) had a notice published in Peru Tribune in Peru, Indiana, stating that Marburger Foods, Inc. had applied for a Minor Source Operating Permit (MSOP) relating to the construction and operation of smokehouses and several natural gas fired combustion units at the existing meat processing plant. The notice also stated that OAQ proposed to issue a Minor Source Operating Permit for this operation and provided information on how the public could review the proposed MSOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comment on whether or not this MSOP should be issued as proposed.

No comment has been received from the source or other interest public persons during public notice or at the end of public notice. However, upon further review, OAQ has determined the following changes (bolded language has been added and the language with a line through it has been deleted) will be made to the permit:

Changes Resulting from Ozone 8-hour County Attainment Status Designations:

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Miami County has been designated as attainment for the 8-hour ozone standard.

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remains unchanged; therefore will not be shown below other than in the table.

County Attainment Status

The source is located in Miami County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1- hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

~~(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.~~

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x are considered when evaluating the rule applicability relating to ozone. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

IDEM, OAQ has decided to make the following changes to Condition D.1.6 so that the language and intent of the condition is clear.

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall record and maintain records for a period of two years of the amounts of ~~each fuel~~ **natural gas** combusted during each ~~month~~ **day in the two (2) boilers.**

Appendix A: Emission Calculations

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit No.: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion Existing Units	Natural Gas Combustion New Units	Wood burning Two Smokehouse	TOTAL
PM	0.37	0.66	5.57	6.60
PM10	1.47	2.64	5.57	9.68
SO2	0.11	0.21	0.00	0.32
NOx	19.37	34.70	0.00	54.07
VOC	1.07	1.91	4.63	7.61
CO	16.27	29.14	0.00	45.41
total HAPs	0.37	0.65	negl.	1.02
worst case single HAP	0.349 (Hexane)	0.63 (Hexane)	negl.	0.98 (Hexane)
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion Furnace No. 1	Shotblasting	Wood burning Smokehouse	TOTAL
PM	0.37	0.66	5.57	6.60
PM10	1.47	2.64	5.57	9.68
SO2	0.11	0.21	0.00	0.32
NOx	19.37	34.70	0.00	54.07
VOC	1.07	1.91	4.63	7.61
CO	16.27	29.14	0.00	45.41
total HAPs	0.37	0.65	negl.	1.02
worst case single HAP	0.349 (Hexane)	0.63 (Hexane)	negl.	0.98 (Hexane)
Total emissions based on rated capacity at 8,760 hours/year.				

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

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit Number: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Total
27.7	242.5	

Plant 1 Building (Existing)

One (1) natural gas fired boiler (Cleaver Brooks) rated at 10.461 MMBtu/hr	10.461
One (1) natural gas fired boiler (Hurst) rated at 10.500 MMBtu/hr	10.500
Three (3) natural gas fired office furnaces with with each one rated at 0.06, 0.06, and 0.115 MMBtu/hr	0.235
Eight (8) natural gas fired room space heaters with each one rated at 0.08, 0.126, 0.10, 0.075, 0.10, 0.10, 0.132 and 0.132 MMBtu/hr	0.845
Two (2) natural gas fired Accuair Units with each rated at 2.82 MMBtu/hr	5.640
Total	27.68

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	0.23	0.92	0.07	12.12	0.67	10.18

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable 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 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 3 for HAPs emissions calculations.

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

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit Number: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

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	2.546E-04	1.455E-04	9.093E-03	2.182E-01	4.122E-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	6.062E-05	1.334E-04	1.697E-04	4.607E-05	2.546E-04

Methodology is the same as page 2.

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit Number: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Total
16.6	145.0	
Plant Building 3 (Existing)		
One (1) natural gas fired boiler (Cleaver Brooks) rated at 4.185 MMBtu/hr		4.185
Three (3) natural gas fired area furnaces with each one rated at 0.12, 0.175, and 0.80 MMBtu/hr		1.095
Three (3) natural gas fired water heater with each one rated at 2.3 MMBtu/hr		6.900
One (1) natural gas fired Accuair unit rated at 3.46 MMBtu/hr		3.460
Wastewater Building		
One (1) natural gas fired pallet shop heater rated at 0.25 MMBtu/hr		0.250
One (1) natural gas fired space heater rated at 0.165 MMBtu/hr		0.165
One (1) natural gas fired water heater rated at 0.20 MMBtu/hr		0.200
Dry Goods Warehouse (Existing)		
One (1) natural gas fired shop furnace rated at 0.30 MMBtu/hr		0.300
Total		16.56

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.14	0.55	0.04	7.25	0.40	6.09

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable 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 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit Number: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.523E-04	8.701E-05	5.438E-03	1.305E-01	2.465E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.626E-05	7.976E-05	1.015E-04	2.755E-05	1.523E-04

Methodology is the same as page 4.

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

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

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit Number: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Total
79.2	693.9	

New Emission Units

One (1) natural gas fired hot water heater rated at 18.0 MMBtu/hr	18.000
Eight (8) natural gas fired smokehouses with each one rated at 3.5 MMBtu/hr	28.000
Six (6) natural gas fired Accuair units with each one rated at 4.59 MMBtu/hr	27.540
Three (3) natural gas fired air make up units with input ratings of 0.3, 1.5 and 1.5 MMBtu/hr	3.275
Three (3) natural gas fired microwave oven preheaters with each one rated at 0.8 MMBtu/hr	2.400
	79.2

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	0.66	2.64	0.21	34.70	1.91	29.14

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable 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 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 7 for HAPs emissions calculations.

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

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit Number: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

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	7.286E-04	4.164E-04	2.602E-02	6.245E-01	1.180E-03

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	1.735E-04	3.817E-04	4.857E-04	1.318E-04	7.286E-04

Methodology is the same as page 6.

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

**Appendix A: Emissions Calculations
Emissions from Pork Smoking**

Company Name: Marburger Foods, Inc.
Address City IN Zip: 3311 State Road 19 South, Peru, IN 46970
Permit Number: MSOP 103-19206-00035
Reviewer: Adeel Yousuf / EVP
Date: June 2, 2003

There are total of eight (8) smokehouses at the source, while only two (2) smokehouses use wood chips for natural smoking

Pollutant	Emission Factor (lbs/ton of sawdust)*	Amount of Sawdust used in one smokehouse (lbs/hr)	Potential Emissions for one smokehouse (lb/hr)	Potential Emissions for one smokehouse (ton/yr)	Potential Emissions for two smokehouses (ton/yr)
PM	53.00	24.00	0.64	2.79	5.571
PM-10	53.00	24.00	0.64	2.79	5.571
VOC	44.00	24.00	0.53	2.31	4.625

* Emission factors for PM, PM-10 and VOC are from AP-42, Section 9.5.2 (Table 9.5.2-1)

Methodology:

PTE (tons/year) = Max. Sawdust Throughput (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lb x Emission Factor (lbs/ton of sawdust) x 1 ton/2000 lbs