

Mario Ornelas

From: Mario Ornelas
Sent: Thursday, September 28, 2023 9:12 AM
To: 'Hull, Robert'
Subject: RE: 32-0215-081059 Koch Foods DRAFT Permit
Attachments: 32-0215_081059 Koch Foods Permit DRAFT 9_28_23.docx

Mr. Hull,

Below I included my responses to each of your points. Please let me know if anything is unclear or if you have further questions. Attached is also the updated draft.

- Section II-Permit Record should reflect that this is a renewal and not a new permit.

Since this permit is on our new template and new limits needed to be added (CO, NOx, VOCs), it was necessary to put this permit through the new construction permit process which gave it a new permit number (081059). Permit history in section II only applies to one specific permit number. However, all old permits and permit application are in our internal database for reference.

- Fees will continue to be invoiced as in the past?

Yes, fees should continue to be invoiced as in the past with no changes in amounts assuming the same SO₂ and PM limits are accepted as on the last permit.

- Recordkeeping requirements changed from 2yrs to 5yrs? Why?

Recently, internal guidance was developed for all permit types to require 5 years of recordkeeping regardless of their status as true minor, conditional major, or Title V.

- Under normal circumstances visible and fugitive emissions evaluations of compliance will not be required, correct?

That is correct. There are few situations where it would be necessary to demonstrate compliance with visible and fugitive emissions, and this would only be done with agency staff being present on-site to conduct a visual determination of emission opacity. If the environmental field office should ever conduct an inspection of the site, they will conduct a visible emission test as part of that inspection. No recordkeeping is required for visible emissions.

- In section V Source Specific Permit Conditions – one boiler is noted as #2 fuel oil backup and other #2 fuel oil as secondary fuel. Does this matter?

This is not a significant difference, but these can be made the same for uniformity. You can see this change on the updated draft.

- Below you indicate that our PM and SO₂ limits are more stringent than those set in the regulations....what would be the applicable regulatory limits normally and would acceptance of those have any impacts except for fees?

The regulations for SO₂ are almost always too high for every facility seeking an air permit due to the outdated nature of when the regulations were first written. If you were to take the state allowable limit, the SO₂ limit would be 157.5

lbs./hr. or 689.85 tons/yr. This is based on your heat input capacity and the applicable emission standard of 5.0 lbs./MMBtu. Your allowable PM emission would be 9.98 lbs./hr. or 43.71 tons/yr. There would not be any impact besides fee determination, but we always suggest taking limitations that better represent the true emissions of the facility. For reference the fee regulation is as follows: *"The appropriate annual emissions fee for minor and conditional major sources in operation on or after July 1, 1993, shall be calculated at an emission fee rate of \$18.75 per ton of allowable emissions of regulated pollutants."* TACPR 1200-26-.02(6)(e)



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From: Hull, Robert <Robert.Hull@kochfoods.com>
Sent: Monday, September 25, 2023 3:34 PM
To: Mario Ornelas <Mario.Ornelas@tn.gov>
Subject: [EXTERNAL] RE: 32-0215-081059 Koch Foods DRAFT Permit

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Mario,

I have looked over the draft permit. A couple of things I wanted to clarify.

- Section II-Permit Record should reflect that this is a renewal and not a new permit
- Fees will continue to be invoiced as in the past?
- Recordkeeping requirements changed from 2yrs to 5yrs? Why?
- Under normal circumstances visible and fugitive emissions evaluations of compliance will not be required, correct?
- In section V Source Specific Permit Conditions – one boiler is noted as #2 fuel oil backup and other #2 fuel oil as secondary fuel. Does this matter?
- Below you indicate that our PM and SO2 limits are more stringent than those set in the regulations....what would be the applicable regulatory limits normally and would acceptance of those have any impacts except for fees?

If you would like to discuss please give me a call.

Thanks

Robert Hull
Complex Environmental Manager
Koch Foods – Morristown
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From: Mario Ornelas <Mario.Ornelas@tn.gov>
Sent: Thursday, September 21, 2023 9:32 AM
To: Hull, Robert <Robert.Hull@kochfoods.com>
Cc: Jill Pratt <Jill.Pratt@tn.gov>
Subject: 32-0215-081059 Koch Foods DRAFT Permit

Good morning,

Attached is the first draft of permit 081059.

We apologize for the delay in processing your permit renewal for your fuel burning installation (source 01.) Due to short staffing issues, we were unable to work on your permit renewal, but we are now working to issue your permit as quickly as possible. Upon review of the last permit, it was found to have some errors which needed to be addressed using the new permit format. The most notable differences are:

The new permit contains emission limitations on CO, NO_x, and VOCs (Volatile Organic Compounds).

The new permit requires an updated agreement letter with a compliance method for the stated emission limitations.

The new permit is formatted to our most current version and includes general requirements for all air contaminant sources.

In order to continue processing this permit, a new agreement letter is required for the limits on PM (TSP) and SO₂ emissions along with your approval of the first draft. An agreement letter for this source was submitted to the division on May 23, 2000, requesting limits on SO₂ and PM (TSP) as 15.97 lbs./hr. and 0.45 lbs./hr. respectively. These limits are more stringent than the state regulations and require an agreement letter from the facility. The existing agreement letter does not include a compliance method and therefore a new letter is required. Since this is a new letter, you may request a different emission limitation or simply request the same limitation as before. If a new limitation is requested, the permit will need to be modified accordingly.

Attached is an example agreement letter. You are welcome to use the template provided or use your own. However, the letter must clearly state the emission limits, include appropriate units, and demonstrate how the facility plans to comply with the stated limitations (compliance method.)

Once we receive the updated agreement letter and approval from both the facility and the EFO, issuance of permit 32-0215-081059 can proceed. Please submit appropriate documentation and comments by September 28, 2023.

Let me know if you have any questions or concerns.



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