

## Mario Ornelas

---

**From:** Mario Ornelas  
**Sent:** Monday, December 4, 2023 8:24 AM  
**To:** Hull, Robert  
**Cc:** Wilds, David  
**Subject:** RE: 32-0215-081059 Koch Foods New Sources

Mr. Hull,

Thank you for the update. Processing will continue once we receive further correspondence.

Sincerely,



**Mario Ornelas** | Environmental Protection Specialist I  
Air Pollution Control  
Knoxville Environmental Field Office  
3711 Middlebrook Pike Knoxville, TN 37916  
p. (865) 403-1578  
Mario.Ornelas@tn.gov

---

**From:** Hull, Robert <Robert.Hull@kochfoods.com>  
**Sent:** Thursday, November 30, 2023 2:15 PM  
**To:** Mario Ornelas <Mario.Ornelas@tn.gov>  
**Cc:** Wilds, David <David.Wilds@kochfoods.com>  
**Subject:** [EXTERNAL] RE: 32-0215-081059 Koch Foods New Sources

Mario,

I just wanted to let you know that we are still working to compile some additional information in order to develop a complete and appropriate response to your conclusions and inquiry on 11-14-2023. I anticipate being prepared to submit the response and any additional supporting data by 12-15-2023.

Thanks

Robert Hull  
Complex Environmental Manager  
Koch Foods – Morristown  
O 423-522-2257  
C 423-353-2819

---

**From:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Sent:** Wednesday, November 15, 2023 9:09 AM  
**To:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>

**Cc:** Wilds, David <[David.Wilds@kochfoods.com](mailto:David.Wilds@kochfoods.com)>  
**Subject:** RE: 32-0215-081059 Koch Foods New Sources

Mr. Hull,

That is fine. Processing of the permit will continue after Thanksgiving.

Thank you,



**Mario Ornelas** | Environmental Protection Specialist I  
Air Pollution Control  
Knoxville Environmental Field Office  
3711 Middlebrook Pike Knoxville, TN 37916  
p. (865) 403-1578  
[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)

---

**From:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Sent:** Tuesday, November 14, 2023 4:44 PM  
**To:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Cc:** Wilds, David <[David.Wilds@kochfoods.com](mailto:David.Wilds@kochfoods.com)>  
**Subject:** [EXTERNAL] RE: 32-0215-081059 Koch Foods New Sources

Mario,  
I have received your correspondence, but will be out of the office from today until 11-21. That week is of course Thanksgiving. I will do my best to respond by sometime the week after Thanksgiving if that works for you.  
Thanks  
Robert Hull

---

**From:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Sent:** Tuesday, November 14, 2023 4:21 PM  
**To:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Cc:** Wilds, David <[David.Wilds@kochfoods.com](mailto:David.Wilds@kochfoods.com)>  
**Subject:** RE: 32-0215-081059 Koch Foods New Sources

Mr. Hull,

The Division has received your response to the inquiry regarding potential additional sources at Koch Foods of Morristown, LLC. Upon review of the information presented the following conclusions have been formed:

Determination of potential to emit of a source is established by evaluating an emissions estimate assuming no control devices were present. Therefore, a baghouse control should be considered in the potential to emit (PTE). Calculations including the baghouse control would refer to maximum actual controlled emissions (MACE). Insignificant or exempt status is determined by PTE not MACE. Additionally, TAPCR 1200-09-.04(5)(g)3 applies to ventilating units that do not exhaust air pollutants. Since the baghouse controls for PM, which is an air pollutant, this rule citation does not apply.

Drift eliminators on cooling towers are control devices which should not be considered when determining potential to emit. They must be considered in determining MACE.

Rule 1200-03-09-.04(4)(d)17 refers to fuel burning sources where the combined total heat input rate at each location does not exceed 10 million Btu/hour. Since the boilers on site are above 10 million Btu/hour, this rule citation does not apply. Assuming the emissions are below the applicable thresholds given in TAPCR 1200-09-.04(4)(b), emissions from natural gas-fired make-up air and HVAC units may still be exempt regardless.

The exempt status of multiple sources on site is appropriate. Can you provide the calculations used in determining the potential emissions and status of each additional source?

Thank you,



**Mario Ornelas** | Environmental Protection Specialist I  
Air Pollution Control  
Knoxville Environmental Field Office  
3711 Middlebrook Pike Knoxville, TN 37916  
p. (865) 403-1578  
[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)

---

**From:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Sent:** Friday, November 10, 2023 10:39 AM  
**To:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Cc:** Wilds, David <[David.Wilds@kochfoods.com](mailto:David.Wilds@kochfoods.com)>  
**Subject:** [EXTERNAL] RE: 32-0215-081059 Koch Foods New Sources

Mario,

Attached you will find two letters. The first letter is in response to your inquiry regarding additional air contaminant sources at our facility. The second is a new agreement letter as requested with the permit renewal regarding particulate matter and sulfur dioxide emissions from the boilers. Should you have any questions or concerns regarding these letters please reach out.

Thanks

Robert Hull  
Complex Environmental Manager  
Koch Foods – Morristown  
O 423-522-2257  
C 423-353-2819

---

**From:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Sent:** Monday, October 30, 2023 10:37 AM  
**To:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Subject:** RE: 32-0215-081059 Koch Foods New Sources

Robert,

That sounds good, thank you for the update.

Thanks,



**Mario Ornelas** | Environmental Protection Specialist I  
Air Pollution Control  
Knoxville Environmental Field Office  
3711 Middlebrook Pike Knoxville, TN 37916  
p. (865) 403-1578  
[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)

---

**From:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Sent:** Monday, October 30, 2023 10:24 AM  
**To:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Subject:** [EXTERNAL] RE: 32-0215-081059 Koch Foods New Sources

Mario,  
Our work is ongoing to prepare an appropriate response. I expect we should have this completed by the end of next week (11-10), but likely sooner.  
Thanks  
Robert

---

**From:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Sent:** Monday, October 30, 2023 8:43 AM  
**To:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Subject:** RE: 32-0215-081059 Koch Foods New Sources

Good morning,

This email is to follow up on the review of Koch Foods' possible air contaminant sources. Could you provide an update regarding the status of the review and a what the expected time is to finish the initial review?

Thank you,



**Mario Ornelas** | Environmental Protection Specialist I  
Air Pollution Control  
Knoxville Environmental Field Office  
3711 Middlebrook Pike Knoxville, TN 37916  
p. (865) 403-1578  
[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)

---

**From:** Mario Ornelas  
**Sent:** Monday, October 9, 2023 11:54 AM  
**To:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Subject:** RE: 32-0215-081059 Koch Foods New Sources

Robert,

I expected it to take some time to review and assess the facility. Thank you for letting me know.

Sincerely,



**Mario Ornelas** | Environmental Protection Specialist I  
Air Pollution Control  
Knoxville Environmental Field Office  
3711 Middlebrook Pike Knoxville, TN 37916  
p. (865) 403-3192  
[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)

---

**From:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Sent:** Monday, October 9, 2023 11:45 AM  
**To:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Subject:** [EXTERNAL] RE: 32-0215-081059 Koch Foods New Sources

**\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. \*\*\***

Mario,

I just wanted to let you know we are reviewing your information request and working to develop an appropriate response. Doing so will likely take some time.

Thanks

Robert Hull

---

**From:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Sent:** Thursday, October 5, 2023 3:16 PM  
**To:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Subject:** 32-0215-081059 Koch Foods New Sources

Good afternoon,

I am following up on our phone call from yesterday.

For reference, the threshold of air contaminant sources needing a permit is 5 tons per year of emissions for all criteria pollutants and VOCs. HAPs have a threshold of 1000 lbs. per year before they require a permit. However, sources with emissions below those limits should still be submitted to the division so that we can classify them as insignificant.

After internal discussion we decided that we should inquire about more possible air contaminant sources on site. I have compared this site to other poultry slaughter facilities and have developed the following list of possible air contaminant sources:

Boilers (PM, NOx, CO, SO2, VOC)  
Water heaters (PM, NOx, CO, SO2, VOC)  
Emergency Engines (PM, NOx, CO, SO2, VOC)  
Cleaners, Sanitizers, & Intervention (VOC)  
Refrigerant systems (VOC or Ammonia)  
Diesel Storage tanks (VOC)  
Live Hang Lines (PM)  
Cooling Towers (PM)

Please let me know which sources you have on site regardless of the emission quantity. Then we will give you further guidance on new APC forms to be submitted.

Let me know if you have questions. My work phone still seems to not be functioning so call my cell (931) 310-8897 for the time being if you would like to discuss anything.

Sincerely,



**Mario Ornelas** | Environmental Protection Specialist I  
Air Pollution Control  
Knoxville Environmental Field Office  
3711 Middlebrook Pike Knoxville, TN 37916  
p. (865) 403-3192  
[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)