

**From:** Air.Pollution Control  
**To:** [APC Permitting](#)  
**Subject:** FW: 32-0215-081059 Koch Foods New Sources  
**Date:** Monday, March 18, 2024 4:50:02 PM  
**Attachments:** [image001.png](#)  
[Agreement Letter 03-18-2024.pdf](#)

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**From:** Mario Ornelas <Mario.Ornelas@tn.gov>  
**Sent:** Monday, March 18, 2024 2:25 PM  
**To:** Air.Pollution Control <Air.Pollution.Control@tn.gov>  
**Subject:** FW: 32-0215-081059 Koch Foods New Sources

Good afternoon,

Please log the following letter under permit 081059.

Thanks in advance!

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](mailto:Mario.Ornelas@tn.gov)

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**From:** Hull, Robert <[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)>  
**Sent:** Monday, March 18, 2024 3:04 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,

Please see the attached revised letter. The applicable value is as you indicated below. Hopefully this letter clarifies the emission factors used for the calculations. If you need anything else let me know.

Thanks

Robert

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**From:** Mario Ornelas <[Mario.Ornelas@tn.gov](mailto:Mario.Ornelas@tn.gov)>  
**Sent:** Monday, March 18, 2024 12:32 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,

In order to use calculations from AP-42 chapter 1.3: Fuel Oil Combustion for emission estimates, we request that Koch Foods includes the specific emission factors for SO<sub>2</sub> and PM in the agreement letter. The letter states both emission factors for natural gas and one emission factor for SO<sub>2</sub>. It should include the fuel oil emission factor for SO<sub>2</sub> as well. I believe the correct factor to be referenced as follows from Table 1.3-1:

SO<sub>2</sub>:

0.21 lbs./10<sup>3</sup> gal.

or

142S where S indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Please verify whether this emission factor is the applicable value for the source and include the correct emission factor on an updated agreement letter.

Let me know if you have any questions.

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](mailto:Mario.Ornelas@tn.gov)



# KOCH FOODS

March 18, 2024

Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

Subject: Permit Agreement Letter  
Koch Foods LLC  
123 South Fairmont Avenue  
Morristown, Hamblen County, TN 37813  
Emission Source Reference No. 32.0215 – 01/Permit No. 081059

Dear Technical Secretary:

On behalf of Koch Foods LLC, the following limitations are agreed upon for the above referenced facility:

**Source 01**

- PM emitted by the fuel burning installation shall not exceed 0.75 lbs/hr on a daily average basis
- SO<sub>2</sub> emitted by the fuel burning installation shall not exceed 0.05 lbs/hr on a daily average basis

Koch Foods LLC shall ensure compliance with these emission limitations by compliance with the heat input rate of the boilers and utilizing only natural gas and #2 fuel oil as the fuel for the boilers. The applicable emission factors are as follows: Natural gas, PM = 7.6 lb./10<sup>6</sup> scf and SO<sub>2</sub> = 0.6 lb./10<sup>6</sup> scf from AP-42 Chapter 1, Table 1.4-2; #2 fuel oil, PM = 3.3lb/10-3 gal, SO<sub>2</sub> = 0.21 lbs/10<sup>3</sup> gal (142S and S = sulfur content of 0.0015 percent) from AP-42, Chapter 1, Table 1.3-1 and Table 1.3-2.

Should you have any questions or require additional information please contact me at 423-522-2257 or [Robert.hull@kochfoods.com](mailto:Robert.hull@kochfoods.com).

Sincerely,

Robert Hull  
Complex Environmental Manager  
Koch Foods – Morristown, TN  
[Robert.Hull@kochfoods.com](mailto:Robert.Hull@kochfoods.com)  
423-522-2257