

ORC EPA

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY**

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.:	<u>OP-49-0010A</u>	Source &	<u>8 boilers and 77 small</u>
Owner:	<u>I.H.F.P., Inc.</u>	Air	<u>combustion sources as identified</u>
		Cleaning	<u>in condition 18 herein</u>
Address:	<u>Marr Street</u>	Device:	<u></u>
	<u>Milton, PA 17847</u>		<u></u>
Attn:	<u>Mr. T. A. Cholak</u>	Location:	<u>Milton Borough</u>
	<u>Plant Manager</u>		<u>Northumberland County</u>

This permit is subject to the following conditions:

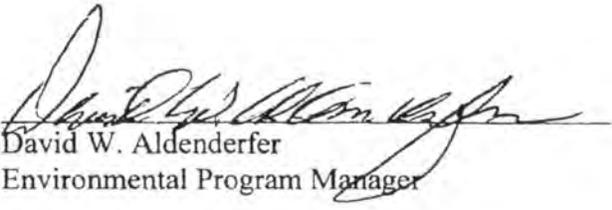
1. That the source(s) and any associated air cleaning device(s) are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.

2. This permit is valid only for the specific equipment, location and owner named above.

See attached for additional conditions.

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: JAN 07 1998


David W. Aldenderfer
Environmental Program Manager

cc: Harrisburg
File

PERMIT CONDITIONS

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COMPANY: I.H.F.P., Inc.

3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for:
 - 4 E. Keeler Type CP 37 million BTU/hour underfeed stoker bituminous coal-fired boilers (#1, 2, 3 and 5).
 - 1 E. Keeler Type DS10-21 116 million BTU/hour natural gas/#2 fuel oil-fired boiler (#7).
 - 1E. Keeler Type DS10-20 108 million BTU/hour natural gas/#2 fuel oil-fired boiler (#6).
 - 1 E. Keeler Type DK10-11 32 million BTU/hour natural gas/#2 fuel oil-fired boiler ("Crunch n-Munch" boiler).
 - 77 small (less than 10 million BTU/hour) natural gas fired air contamination sources, as specifically identified in Exhibit 2 of American Home Foods' 1/27/95 RACT proposal.
4. The expiration date shown on this operating permit is for state purposes. For Federal enforcement purposes the operating permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51.4 and approved by the U.S. Environmental Protection Agency (EPA).
5. Pursuant to the RACT provisions of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the following nitrogen oxides (NO_x) emission limits are established: The E. Keeler DS10-20 boiler (designated #6) shall not emit nitrogen oxides at a rate in excess of 0.1 pounds per million BTU of heat input when firing natural gas or in excess of 0.15 pounds per million BTU of heat input when firing #2 fuel oil. The E. Keeler DS10-21 boiler (designated #7) shall not emit nitrogen oxides at a rate in excess of 0.1 pounds per million BTU of heat input when firing natural gas or in excess of 0.2 pounds per million BTU of heat input when firing #2 fuel oil. Compliance with these limitations shall be determined based on the arithmetic average of at least three individual test runs.
6. Pursuant to the RACT provisions of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the E. Keeler DS10-20 and DS10-21 boilers (#6 and #7) shall not be fired on #2 fuel oil more than 500 hours (each) in any 12 consecutive month period. The company shall maintain written records of the date and duration of each occasion of #2 fuel oil-firing in the subject boilers and shall make these records available to the Department upon request.

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~~CONDITION~~

7. Sometime during the period January 1, 2002 to June 30, 2002, and additionally at five-year intervals thereafter, the Keeler DS10-20 and DS10-21 boilers (#6 and #7) shall undergo stack testing to determine compliance with the nitrogen oxides RACT emission limitations specified in condition 5 herein. This testing shall be conducted in accordance with the provisions of Chapter 139 of Article III of the Rules and Regulations of the Department of Environmental Protection, and is to be performed at or near full load conditions.
8. The testing required by condition 7 herein must include #2 fuel oil-firing tests for each boiler unless the company can demonstrate to the Department's satisfaction, as of the date of testing, that #2 fuel oil usage in the respective boiler has not exceeded 170,000 gallons in any 12 consecutive month period following the issuance of this operating permit.
9. At least 60 days prior to the performance of any testing required by condition 7 herein, the company shall submit a pre-test plan to the Department for evaluation. This plan shall contain the specific testing and analytical procedures to be used in performing the testing and the method to be used in determining heat input to the boilers during testing. This plan is to be accompanied by a dimensioned sketch of the stack(s) showing the proposed location of the sampling ports.
10. The Department shall be given at least 14 days advance notice of the specific dates and times for the performance of any testing required by condition 7 herein in order that Department personnel can arrange to be present. The Department is under no obligation to accept the results of any testing performed without adequate advance notice having been given to the Department.
11. Within 60 days of the completion of any testing required by condition 7 herein, 2 copies of a test report shall be submitted to the Department. This report shall contain the results of the testing (reported as pounds per million BTU of heat input), a description of the testing and analytical procedures actually used for the performance of the tests, a copy of all raw data generated during the tests and a copy of all calculations performed.
12. Pursuant to the presumptive RACT requirements of 25 Pa. Code 129.93(b), the four E. Keeler type CP stoker boilers (#1, #2, #3 and #5) and the E. Keeler DK10-11 boiler ('Crunch-n-Munch') shall undergo annual tuneups which shall include, at a minimum, the procedures required by 25 Pa. Code 129.93(b)(2). The first such tuneup for each of these sources shall be accomplished by the end of calendar year 1995, with subsequent tuneups to be performed on or about the same date(s) each year thereafter. Any of the respective boilers which are prohibited from operating by any condition contained herein need not comply with this annual tuneup requirement.
13. At least 60 days prior to the scheduled date(s) of any tuneup(s) required by condition 12 herein, the company shall submit to the Department a plan detailing how the final nitrogen oxides and carbon monoxide emission rates will be determined for each unit at the completion of said tuneup(s). These rates are required to be determined and recorded pursuant to 25 Pa. Code 129.93(b)(3)(iv).

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X = NON
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14. All records pertaining to the tuneups required by condition 12 herein shall be maintained in a permanently bound log book. These records shall include, at a minimum, the information specified in 25 Pa. Code 129.93(b)(3).
15. Pursuant to the presumptive RACT requirements of 25 Pa. Code 129.93(c), the 77 miscellaneous natural gas-fired sources with heat inputs of less than 20 million Btu/hour (as listed in Exhibit 2 of American Home Foods' 1/27/95 RACT proposal) shall be maintained and operated in accordance with manufacturers' specifications as well as in accordance with good air pollution control practices.
16. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits or allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).

18. This operating permit is issued for the operation of the following air contamination sources at the company's Milton Complex:
 - Keeler Type DS10-21 116 million Btu/hour natural gas/#2 fuel oil-fired boiler (#7)
 - Keeler Type DS10-20 108 million Btu/hour natural gas/#2 fuel oil-fired boiler (#6).

 - Keeler Type DK10-11 32 million Btu/hour natural gas/#2 fuel oil-fired boiler ('Crunch-n-Munch' boiler)
 - 77 small (less than 10 million Btu/hour) natural gas-fired sources, as listed in Exhibit 2 of American Home Foods' 1/27/95 RACT proposal

This operating permit also addresses, but does not authorize the operation of, four E. Keeler Type CP 37 million BTU/hour underfeed stoker bituminous coal-fired boilers, designated #1, #2, #3 and #5.

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LIMITATION

31. The operation of the aforementioned boiler(s) shall not at any time result in the emission of any air contaminant in excess of the limitations specified in any condition contained herein or in the emission of visible air contaminants in excess of the limitations specified in Section 123.41, particulate matter in excess of the limitations specified in Section 123.11 or sulfur oxides in excess of the limitations specified in Section 123.22, all sections of Chapter 123 of Article III of the Rules and Regulations of the Department of Environmental Protection or in the emission of any of these or any other type of air contaminant in excess of the limitations specified in, or established pursuant to, any other applicable rule or regulation contained in Article III.

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32. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in any condition contained herein or specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.
33. The company shall, upon Department request, provide fuel analyses, or fuel samples, of the fuel used in the aforementioned boiler(s).

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