

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - AIR QUALITY CONTROL

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-46-0001</u>	Source(s)	<u>Facility NOx RACT</u>
Owner	<u>Moyer Packing Company</u>	Air	<u></u>
Address	<u>PO Box 395</u>	Cleaning	<u></u>
	<u>Souderton, PA 18964</u>	Device	<u></u>
Attention	<u>Mr. George Witmayer</u>	Location	<u>741 Souder Road</u>
	<u>Environmental Affairs Director</u>		<u>Franconia Township</u>
			<u>Montgomery County</u>

This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning devices 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 plan approval issued under the same number;
 - 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.

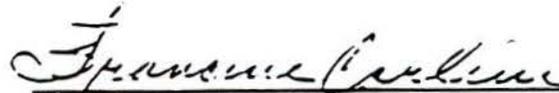
(SEE ADDITIONAL CONDITIONS ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.44. 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 03/15/96

Expires ~~03/15/2001~~

cc: Central Office
Re (KAL)233-3


Francine Carlini
Regional Manager
Air Quality

**OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0001
MOYER PACKING COMPANY**

CONDITIONS (CONTINUED):

3. This Operating Permit incorporates the operating conditions of all criteria pollutants except NOx from the existing Operating Permit No. 46-302-069 and Plan Approval No. 46-317-005E and supersedes all operating conditions with regard to NOx from the sources at Moyer Packing Company ("Moyer").

4. Source Inventory

Source No.	Type of Source	Manufacturer and Model	Rated Capacity Btu/hr	Type of Fuel
1	Keeler Boiler No. 1	Keeler WB-1-22 Serial No. 16482	56,400,000	No. 6 Fuel Oil
2	Keeler Boiler No. 2	Keeler WB-1-22 Serial No. 17138	56,400,000	No. 6 Fuel Oil
3	York Shipley Boiler	York Shipley 5PH600-6-93777	25,375,375	No. 6 Fuel Oil
4	2400 Ring Dryer	Maxon Serial No. 32350	11,700,000	No. 2 Fuel Oil
5	Space Heaters (6)	John Deere and Dayton 3E358	350,000 (each)	Kerosene
6	Front Office Heater	Energy Kinetics EK-1	120,000	No. 2 Fuel Oil
7	WWTP Boiler	Weil McClain BL-1086-W	2,509,000	No. 2 Fuel Oil
8	Hide Building Boiler	Weil McClain BL-1086-W	2,509,200	No. 2 Fuel Oil
9	Emergency Generator	John Deere 4039T	280,104	Diesel

5. The emissions of VOC for the various sources at the facility shall be less than the "de minimis" established by the Department.

6. Boilers (Source Nos. 1-3)

The following conditions apply to the two Keeler and one York Shipley boiler at the facility.

A. There is no restriction on operating hours.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0001
MOYER PACKING COMPANY

CONDITIONS (CONTINUED):

- B. These boilers are to be fired on No. 6 fuel oil to which there has been no reclaimed or waste oil or other waste materials added.
 - C. The emissions of Nitrogen Oxides (NO_x) from each of the boilers shall be limited to 0.37 lb/MMBtu.
 - D. A meter shall be installed on each of the fuel lines supplying No. 6 fuel oil to each of the three boilers. An equivalent monitoring technique may be used if approved by the Department.
 - E. Within one hundred and eighty (180) days after receiving this operating permit, the owner or operator shall perform a stack test on all three boilers in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department. The stack test shall be performed for NO_x while the boilers are operated at the maximum rated capacities using No. 6 fuel oil.
 - F. At least thirty (30) days prior to the test, the Regional Air Pollution Control Manager shall be informed of the date and time of the test.
 - G. At least thirty (30) days prior to the test, the company shall submit to the Department for approval of the procedures for the test and a sketch with dimensions including the location of sampling ports and other data to ensure the collection of representative samples.
 - H. Within thirty (30) days after the source test, two copies of the complete test report, including all operating conditions shall be submitted to the Regional Air Pollution Control Manager.
7. **Monitoring, Recordkeeping, and Reporting for the two Keeler and one York Shipley boiler:**
- A. The owner and operator shall inspect, adjust, clean or replace fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
 - B. The owner and operator shall inspect the flame pattern or characteristics and carry out adjustments to minimize emissions of NO_x ~~and to the extent possible minimize emissions of CO.~~
 - C. The owner and operator shall inspect the air-to-fuel ratio control system and carry out adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0001
MOYER PACKING COMPANY

CONDITIONS (CONTINUED):

- D. The owner and operator shall tune the boiler for low excess oxygen operation. The owner and operator shall record data for subsequent comparison and adjustment.
 - E. The owner and operator shall operate and maintain the sources in a manner consistent with good operating and maintenance practices.
 - F. The owner and operator shall record all adjustments in a permanently bound log book or other method approved by the Department. The log shall, at the minimum, contain the following information:
 - i. the date of the tuning procedure
 - ii. the name of the service company and technicians
 - iii. the final operating rate or load
 - iv. the final CO and NO_x emission rates
 - v. the final excess oxygen rate
 - G. The owner and operator shall also maintain records including a certification from the fuel supplier of the nitrogen content of the fuel, and identification of the sampling method and sampling protocol.
- 8. A meter shall be placed on the No. 2 fuel oil line supplying fuel to the 2400 ring dryer.
 - 9. A meter shall be placed on the No. 2 fuel oil line supplying fuel to the WWTP boiler.
 - 10. A meter shall be placed on the No. 2 fuel oil line supplying fuel to the Hide Building boiler.
 - 11. A meter shall be placed on the No. 2 fuel line so that total consumption of No. 2 fuel oil at the facility can be measured.
 - 12. A meter shall be placed on the kerosene line supplying kerosene to the six space heaters.
 - 13. A meter shall be placed on the diesel line supplying diesel to the emergency generator.
 - 14. Source Nos. 4-9 identified in condition No. 4 shall be installed, maintained and operated in accordance with manufacturers specifications.
 - 15. The hours of operation of the generator shall be recorded in a permanently bound log book. The generator shall be used as standby and the operating hours shall not exceed 500 hours in a consecutive 12-month period.

**OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0001
MOYER PACKING COMPANY**

CONDITIONS (CONTINUED):

16. Equivalent techniques to metering as required in conditions 7 through 12 may be used if approved by the Department.
17. Recordkeeping and Reporting Requirements
 - A. The permittee shall maintain a file containing the fuel use by different sources at the facility on a monthly basis.
 - B. The permittee shall calculate the total NOx emissions at the facility on a monthly basis.
 - C. The records shall provide sufficient data to determine compliance with the conditions in this permit.
 - D. Records shall be retained for at least two years and shall be made available to the Department on request.
 - E. All recordkeeping requirements from existing permits shall continue to be met.
 - F. The date of the maintenance and name of the service company and technicians shall be recorded in a permanently bound log book.
18. General Requirements
 - A. The above sources may not be operated without a valid operating permit. Operation without an appropriate permit from the Department may be subject to enforcement action.
 - B. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0001
MOYER PACKING COMPANY

CONDITIONS (CONTINUED):

- C. 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, 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.

- D. The expiration date shown on this Operating Permit is for State purposes only.

(KAL)233.6