

Public Notice

DEQ Requests Comments on OFD Foods LLC Plants 2 and 3 Proposed Air Quality Permit

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of OFD Foods LLC Plant 2 and 3 proposed renewal air quality permit, known officially as a Simple Air Contaminant Discharge Permit.

Summary

The proposed permit is a renewal of the existing Simple Air Contaminant Discharge Permit that was scheduled to expire on March 1, 2020. The company submitted a timely renewal application on Dec. 23, 2019. Therefore, the current permit remains in effect until the renewal is issued. Upon issuance, this permit will be effective for five years.

How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

Suzy Luttrell
DEQ Permit Coordinator
4026 Fairview Industrial Drive SE
Salem, OR 97302
Fax: 503-378-4196
Email: luttrell.suzy@deq.state.or.us

Written comments are due by 5 p.m. Mon. Oct. 26, 2020.

About the facility

OFD processes freeze dried fruits, vegetables and other food products. The food products, packaged in cans or plastic-lined containers, are then hermetically sealed. In addition, the facility makes a flavor-enhancing ingredient used by the sports drink industry. OFD does not produce the beverage, but provides a flavoring additive to the sports drink. Two natural gas-fired boilers provide steam for the process.

What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit

requirements according to state and federal regulations.

How does DEQ monitor compliance with the permit requirements?

This permit would require the facility to monitor pollutants using federally approved monitoring practices and standards.

The facility is required to keep records of plant production and material usage including hazardous air pollutant containing compounds.

Formulas to calculate emissions are contained in the permit. The permittee is required to calculate facility emissions monthly and submit an emissions report annually. On-site inspections will be conducted to assure compliance with emission limitations.

What happens after the public comment period ends?

DEQ will consider and provide response to all comments received that are pertinent to the proposed permit after the close of the comment period. DEQ may modify the proposed permit based on the comments received, but DEQ can only modify conditions of the permit in accordance with the rules and statutes under the authority given to the DEQ. If the facility meets all legal requirements, DEQ will issue the facility's air quality permit.

Where can I get more information?

Find out more and view the application at <https://www.oregon.gov/deq/Get-Involved/Pages/Public-Notices.aspx> or contact Peter Susi, DEQ Permit Writer, at:

Phone: 503-378-5408

Fax: 503-378-4196

Email: susi.peter@deq.state.or.us

View the application and related documents in person at the DEQ office in Salem. For a review appointment, call Suzy Luttrell at 503-378-5305.

Alternative Formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.



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Department of
Environmental
Quality

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www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

Notice issued: 9/25/2020
By: Shane Cossel
Permit number: 22-8045-SI

Emissions limits

Regulated Pollutants:

OFD Foods, LLC Plants 2 and 3 do not have the potential to be a major source of criteria air pollutants.

Table 1 below presents maximum allowable emissions of regulated criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Table 1

Pollutant	Current Limit (tons/year)	Proposed Limit (tons/year)
Particulate matter	24	24
Small particulate matter	14	14
Fine particulate matter	9	9
Nitrogen oxides	39	39
Sulfur dioxide	39	39
Carbon monoxide	99	99
Volatile organic compounds	39	39
Greenhouse gases	74,000	74,000

For more information about criteria pollutants, go to: <https://www.epa.gov/criteria-air-pollutants>

Hazardous air pollutants:

OFD Foods, LLC Plants 2 and 3 have the potential to be a major source for the hazardous air pollutant acetaldehyde. However, the permittee has accepted the generic PSEL, an enforceable limit, of 9 tons per year that is below the major source threshold.

Table 2

Hazardous Air Pollutants	Projected Emissions (tons/year)
Acetaldehyde	7.4
Total	7.4

For more information about hazardous air pollutants, go to:
<https://www.epa.gov/haps/health-effects-notebook-hazardous-air-pollutants>



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

SIMPLE

AIR CONTAMINANT DISCHARGE PERMIT

Western Region
 4026 Fairview Industrial Drive SE
 Salem, OR 97302

This permit is being issued in accordance with the provisions of ORS 468A.040.

ISSUED TO:

OFD Foods, LLC
 PO Box 1048
 Albany, OR 97322

INFORMATION RELIED UPON:

Application No.: 31098
 Date Received: 12/23/2019

PLANT SITE LOCATION:

Plant 2 and 3
 525 25th Ave.
 Albany, OR 97322

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Albany
 Approval Date: 11/17/2004

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

 Claudia Davis, Western Region Air Quality Manager

 Date

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

Table 1 Code	Source Description	SIC/NAICS
Part B, 13	Boiler over 10MMBtu/hour heat input	4961 / 221330
Part B, 85	Source not otherwise listed that would have emissions greater than 10 tons/ year if operated uncontrolled (food freeze-drying)	2034 / 311423

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1.0 DEVICE, PROCESS AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

The devices, processes, and pollution control devices regulated by this permit are the following:

Devices and Processes Description	Device ID	Pollution Control Device Description	PCD ID
Cleaver-Brooks Boiler #1	B-1	None	N/A
Cleaver-Brooks Boiler #2	B-2	None	N/A
Caterpillar G30F3 Emergency Generator #1	EG-1	None	N/A
Sports Drink Processing Line(s)	SD- L	None	N/A

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.1. Visible Emissions

The permittee must comply with the following visible emission limits from air contaminant sources other than fugitive emission sources, as applicable. Opacity must be measured as a six-minute block average using EPA Method 9 or an alternative monitoring method approved by DEQ that is equivalent to EPA Method 9.

- a. Emissions from any air contaminant source must not equal or exceed 20% opacity. [OAR 340-208-0110(3)(b) and (4)]
- b. Any devices or processes installed, constructed, or modified on or after April 16, 2015 must not equal or exceed 20% opacity. [OAR 340-208-0110(4) and (7)]

2.2. Fugitive Emissions

- a. The permittee must take reasonable precautions to prevent fugitive dust from leaving the property of a source. Reasonable precautions include, but are not limited to: [OAR 340-208-0210]
 - i. Using, where possible, water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - ii. Applying water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;

- iii. Enclosing (full or partial) materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter, including dust, from becoming airborne;
 - iv. Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - v. Installing adequate containment during sandblasting or other similar operations;
 - vi. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
 - vii. Promptly removing earth or other material that does or may become airborne from paved streets.
- b. If requested by DEQ, the permittee must:
- i. Prepare and submit a fugitive emission control plan within 60 days of the request;
 - ii. Implement the DEQ approved plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period; and
 - iii. Keep the plan on site and make the plan available upon request. [OAR 340-208-0210]
- c. In no case may fugitive dust emissions leave the property of a source for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions must be measured by EPA Method 22 with a minimum observation time of six minutes.

2.3. Particulate Matter Emissions

The permittee must comply with the following particulate matter emission limits. For fuel burning equipment that burns wood fuel by itself or in combination with any other fuel, emission results are corrected to 12% CO₂. For fuel burning equipment that burns fuels other than wood, emission results are corrected to 50% excess air.

- a. Particulate matter emissions from B-1 and B-2 must not exceed 0.14 grains per dry standard cubic foot; [OAR 340-228-0210(2) (b) (B)]
- b. Particulate matter emissions from EG-1 and SD-L must not exceed 0.14 grains per dry standard cubic foot; [OAR 340-226-0210(2) (b) (B)]
- c. Particulate matter emissions from any fuel burning equipment (except solid fuel burning devices that have been certified under OAR 340-262-0500) that is installed, constructed or modified on or after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot, corrected to 12% CO₂ or 50% excess air; [OAR 340-228-0210(2) (c)]
- d. Particulate matter emissions from any device or process (other than fugitive emissions sources, fuel burning equipment, refuse burning equipment, or solid fuel burning devices certified under OAR 340-262-0500) that is installed, constructed or modified after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot. [OAR 340-226-0210(2) (c)]

2.4. Particulate Matter Fallout

The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0450]

2.5. Nuisance and Odors

The permittee must not cause or allow the emission of odorous or other fugitive emissions to create nuisance conditions off the permittee's property. DEQ personnel will verify nuisance conditions. [OAR 340-208-0300]

2.6. Complaint Log

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. Documentation must include: [OAR 340-214-0114]

- a. The date the complaint was received;
- b. The date and time the complaint states the condition was present;
- c. A description of the pollution or odor condition;
- d. The location of the complainant/receptor relative to the plant site;
- e. The status of plant operation or activities during the complaint's stated time of pollution or odor condition; and
- f. A record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

2.7. Fuels and Fuel Sulfur Content

- a. The permittee must not use any fuels other than natural gas, propane, butane or any of the ASTM grade fuel oils listed. The sulfur content cannot exceed:
 - i. 0.0015% sulfur by weight for ultra-low sulfur diesel;
 - ii. 0.3% sulfur by weight for ASTM Grade 1 distillate oil; [OAR 340-228-0110]
 - iii. 0.5% sulfur by weight for ASTM Grade 2 distillate oil. [OAR 340-228-0110]

3.0 NEW SOURCE PERFORMANCE STANDARDS

3.1. Boiler B-1

B-1 is subject to the federal requirements contained in 40 CFR Part 60, Subpart Dc. A summary of the requirements follows.

3.2. Fuel Sulfur Limits

The Sulfur content of fuel oil burned in B-1 must not exceed 0.5% by weight.

3.3. Fuel Sulfur Content Monitoring

Unless an approved alternate monitoring frequency is obtained from the DEQ, the permittee must record and maintain records of the amount of each fuel combusted each month in B-1.

- a. If oil is burned, the permittee must maintain records of the sulfur content of the fuel oil by either obtaining fuel supplier certifications or sampling and analyzing the fuel oil in accordance with ASTM procedures;
- b. If relying on fuel samples for demonstrating compliance with fuel sulfur limits, a sample must be collected and analyzed after each shipment of fuel is added to the storage tank.

3.4. Reporting Requirement

Unless an approved alternate monitoring frequency is obtained from the DEQ, the permittee must submit semi-annual reports for periods during which oil was burned that include the following information:

- a. The calendar dates covered in the reporting period;
- b. Each 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; including
- c. Reasons for any noncompliance with emission standards; and
- d. A description of corrective action taken.
- e. If fuel supplier certifications are used to demonstrate compliance, records of fuel supplier certification that include:
 - i. For distillate oil:
 - A. The name of the oil supplier; and
 - B. A statement for the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR §61.41c;
 - C. Each semi-annual report must be postmarked by the 30th day following the end of the reporting period.

3.5. Recordkeeping

The permittee must maintain on-site records of the amount and type of fuels burned each month for a period of at least two (2) years.

3.6. Construction or Modification

In addition to the Notice of Intent to Construct (NC) requirement in Condition 9.6, the permittee must notify the DEQ and EPA when equipment becomes subject to NSPS.

4.0 OPERATION AND MAINTENANCE REQUIREMENTS

4.1 Boiler Tune-up

The permittee must conduct a maintenance service on boiler B-1 and B-2 at least once every two (2) years. At a minimum, the service must include an inspection of the burners and refractory chamber, cleaning, adjustment and necessary repairs.

4.2 Operation of Pollution Control Devices and Processes

The permittee must operate and ensure proper functioning of all air pollution control devices and components at all times when the associated emission source is operating. [OAR 340-226-0120]

4.3 Operating Conditions for Emergency Stationary RICE

The permittee must operate EG-1 in compliance with the following conditions: [40 CFR 63.6640(f)]

- a. There is no time limit on the use of EG-1 during an emergency;
- b. EG-1 may be operated for the purpose of maintenance checks and readiness testing, provided the manufacturer, vendor or the insurance company associated with the engine recommend the tests. Required maintenance and testing of such units is limited to 50 hours per year;
- c. The permittee is prohibited from using EG-1, or any emergency stationary RICE, for any non-emergency use including but not limited to peak shaving, demand response operation, and/or generation of income from the sale of power. To perform such activity, the permittee must first obtain a modified permit in accordance with Condition 10.2 or a separate permit for power generation that appropriately addresses and allows this activity.

4.4 Operation and Maintenance for Emergency Stationary RICE

For EG-1, the permittee must comply with the following operation and maintenance requirements. [40 CFR 63.6640(f)]

- a. At all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions; [40 CFR 63.6605(b)]
- b. Change oil and filter annually or every 500 hours of operation, whichever comes first; [40 CFR 63.6602, table 2c (6)]
- c. Inspect air cleaner annually or every 1,000 hours of operation, whichever comes first. [40 CFR 63.6602, table 2c (6)] The permittee may elect to comply with the oil analysis requirements of §63.6625(i) in lieu of the oil change requirement. Oil analyses must be conducted at the same frequency as the oil change requirement;
- d. Inspect all hoses and belts annually or every 500 hours of operation, whichever comes first, and replace as necessary; [40 CFR 63.6602, table 2c (6)]

- e. The permittee must operate and maintain each stationary RICE according to the manufacturer's emission-related written instructions, including operation and maintenance instructions. If the permittee develops their own maintenance plan and it is approved by DEQ, that plan may substitute for the manufacturer's instructions; [40 CFR 63.6625(e) and 40 CFR 63.6640(a), Table 6(9)]
- f. During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply; and [40 CFR 63.6602, table 2c]
- g. If not already installed, the permittee must install a non-resettable hour meter. [40 CFR 63.6625(f)]

4.5. Highest and Best Practicable Treatment and Control

The permittee must provide the highest and best practicable treatment and control of air contaminant emissions in every case to maintain overall air quality at the highest possible levels, and to maintain contaminant concentrations, visibility reduction, odors, soiling, and other deleterious factors at the lowest possible levels as provided below. [OAR 340-226-0100]

5.0 PLANT SITE EMISSION LIMITS

5.1. Plant Site Emission Limits (PSEL)

The permittee must not cause or allow plant site emissions to exceed the following: [OAR 340-222-0040 and/or OAR 340-222-0041, OAR 340-222-0060]

Pollutant	Limit	Units
PM	24	tons per year
PM ₁₀	14	
PM _{2.5}	9	
SO ₂	39	
NO _x	39	
CO	99	
VOC	39	
GHGs (CO ₂ e)	74,000	
Single HAP (acetaldehyde)	9	
Combined HAPs	24	

5.2. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period. [OAR 340-222-0035]

6.0 COMPLIANCE DEMONSTRATION

6.1. PSEL Compliance Monitoring using Emission Factors

The permittee must calculate the emissions for each 12-consecutive calendar month period based on the following calculation for each pollutant except GHGs: [OAR 340-222-0080]

$$E = \Sigma(EF \times P) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

E = pollutant emissions (tons/year);

Σ = symbol representing “summation of”;

EF = pollutant emission factor (see Condition 13.0);

P = process production (see Condition 14.0).

6.2. Emission Factors

The permittee must use the default emission factors provided in Condition 13.0 for calculating pollutant emissions, unless alternative emission factors are approved in writing by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ. [OAR 340-222-0080]

6.3. Greenhouse Gas Emissions

The permittee must calculate greenhouse gas emissions in metric tons and short tons for each 12-consecutive calendar month period to determine compliance with the GHG PSEL by using the following: [OAR 340-215-0040]

- a. DEQ Fuel Combustion Greenhouse Gas Calculator
<https://www.oregon.gov/deq/FilterDocs/ghgCalculatorFuelCombust.xlsx>

6.4. Mass Balance without controls

The permittee must calculate the VOC & HAP emissions for each 12 consecutive calendar month period based on the following formula: [OAR 340-222-0080]

$$E_{\text{VOC-A or HAP-A}} = [\sum(C_x \times D_x \times K_x) - W] \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

$E_{\text{VOC-A}}$	=	VOC emissions in tons/year;
$E_{\text{HAP-A}}$	=	HAP emissions in tons/year;
Σ	=	symbol representing “summation of”;
C	=	Material usage for the period in pounds or gallons;
D	=	Material density in pounds per gallon;
K	=	VOC & HAP concentration in pounds per pound of material, expressed as a decimal;
x	=	Subscript x represents a specific material;
W	=	Weight of VOC or HAP shipped offsite in pounds.

6.5. PSEL Compliance Monitoring

The permittee must demonstrate compliance with the PSEL by totaling the emissions from all point sources calculated under Conditions 6.1, 6.3 and 6.4. [OAR 340-222-0080]

7.0 SPECIAL CONDITION

7.1. Sports Drink Processing Line (SD-L)

For the facility to remain a synthetic minor, the permittee may not use more than 20,900 pounds of acetaldehyde in any 12-consecutive calendar month period.

8.0 RECORDKEEPING REQUIREMENTS

8.1. Operation and Maintenance

The permittee must maintain the following records related to the operation and maintenance of the facility and associated air contaminant control devices: [OAR 340-214-0114]

- Amount of natural gas combusted in boiler B-1 and B-2, monthly and annually;
- Amount of #2-diesel fuel combusted in boiler B-1 and B-2, monthly and annually;
- Service records for boiler B-1 and B-2 in accordance with Condition 4.1;

- d. The following curtailment records for boilers B-1 and B-2:
 - i. Company name and address;
 - ii. Identification of affected boilers;
 - iii. Reason facility was unable to use natural gas or equivalent fuel;
 - iv. Date when natural gas curtailment was declared or supply interrupted;
 - v. Type of alternative fuel used;
 - vi. Date when alternate fuel use ends;
 - vii. Amount of alternate fuel combusted.
- e. Fuel certification sheets from each vendor documenting the sulfur content of every shipment of fuel oil in accordance with Condition 3.2 and 3.3.
- f. The following records for emergency generator engine EG-1: [40 CFR 63.6655(f)]
 - i. Date, start time, end time and hours of operation of that is recorded through the non-resettable hour meter;
 - ii. Notification of the emergency situation; including what classified the operation as emergency;
 - iii. Date, start time, end time and hours of non-emergency operation used for maintenance checks and readiness testing;
 - iv. Records of operation and maintenance requirements in Condition 4.4.
- g. Amount of acetaldehyde used in pounds, monthly and annually.

8.2. Excess Emissions

- a. The permittee must maintain the records of excess emissions listed below and as defined in OAR 340-214-0300 through 340-214-0340, recorded on occurrence. Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity as a six-minute block average.
 - i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
 - ii. The date and time the permittee notified DEQ of the event;
 - iii. The equipment involved;
 - iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
 - vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations); and
 - vii. The final resolution of the cause of the excess emissions.
- b. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the

equipment or facility, or cause injury to employees. In no case may the permittee operate more than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4);

- c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311;
- d. The permittee must maintain a log of all excess emissions in accordance with OAR 340-214-0340(3).

8.3. Complaints

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means according to Condition 2.6. Documentation must include all information identified in Condition 2.6. [OAR 340-214-0114]

8.4. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite. [OAR 340-214-0114]

9.0 REPORTING REQUIREMENTS

9.1. Excess Emissions

The permittee must notify DEQ of excess emissions events if the excess emission is of a nature that could endanger public health.

- a. The permittee must also submit follow-up reports summarizing records of excess emissions as required in Condition 8.2 when required by DEQ. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 11.0 by email, telephone, facsimile, or in person.

9.2. Semi-annual

The permittee must submit semi-annual reports of fuel usage in Boiler B-1 as stated in Condition 3.4.

9.3. Annual Report

For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) paper copies and one (1) electronic copy of the following information for the previous calendar year. If February 15 falls on a weekend or Monday holiday, the permittee must submit their annual report on the next business day.

- a. Operating parameters:
 - i. Amount of natural gas combusted in boiler B-1 and B-2;
 - ii. Amount of #2-diesel fuel combusted in boiler B-1 and B-2;
 - iii. A copy of service records for boiler B-1 and B-2 including date of last service;
 - iv. Curtailment records for boilers B-1 and B-2;
 - v. Copy of fuel certification sheets from each vendor documenting the sulfur content of each shipment of fuel oil delivered to the facility;
 - vi. The amount of acetaldehyde used in SD-L, in pounds.
- b. Calculations of annual pollutant emissions determined each month in accordance with Condition 6.1;
- c. A brief summary listing the date, time, and the affected device/process for each excess emission that occurred during the reporting period;
- d. Summary of complaints relating to air quality received by permittee during the year in accordance with Condition 8.3;
- e. The following records for emergency generator EG-1: [40 CFR 63.6655(f)]
 - i. Hours of operation of emergency generator EG-1 that is recorded through the non-resettable hour meter;
 - ii. Hours of emergency operation; including what classified the operation as emergency; and
 - iii. Hours of non-emergency operation used for maintenance checks and readiness testing.
- f. List permanent changes made in facility process, production levels, and pollution control equipment that affected air contaminant emissions.

9.4. Greenhouse Gas Registration and Reporting

- a. If the calendar year greenhouse gas emissions (CO₂e) are ever greater than or equal to 2,756 tons (2,500 metric tons), the permittee must annually register and report its greenhouse gas emissions with DEQ in accordance with OAR 340 division 215.
- b. If the calendar year greenhouse gas emissions (CO₂e) are less than 2,756 tons (2,500 metric tons) for three consecutive years, the permittee may stop reporting greenhouse gas emissions but must retain all records used to calculate greenhouse gas emissions for the five years following the last year that they were required to report. The permittee must resume reporting its greenhouse gas emissions if the calendar year greenhouse gas emissions (CO₂e) are greater than or equal to 2,756 tons (2,500 metric tons) in any subsequent calendar year.

9.5. Notice of Change of Ownership or Company Name

The permittee must notify DEQ in writing using a DEQ “Transfer Application Form” within 60 days after the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

9.6. Construction or Modification Notices

The permittee must notify DEQ in writing using a DEQ “Notice of Intent to Construct Form or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

10.0 ADMINISTRATIVE REQUIREMENTS

10.1. Permit Renewal Application

The permittee must submit the completed application package for renewal of this permit **180 days prior to the expiration date**. Two (2) paper copies and one (1) electronic copy of the application must be submitted to the DEQ Permit Coordinator listed in Condition 11.2. [OAR 340-216-0040]

10.2. Permit Modifications

Application for a modification of this permit must be submitted at least 60 days prior to the source modification. When preparing an application, the applicant should also consider submitting the application 180 days prior to allow DEQ adequate time to process the application and issue a permit before it is needed. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the DEQ Business Office.

10.3. Annual Compliance Fee

The permittee must pay the annual fees specified in OAR 340-216-8020, Table 2, Part 2 and 3 for a Simple ACDP by **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations will be mailed prior to the above date. **Late fees in accordance with Part 5 of the table will be assessed as appropriate.**

10.4. Change of Ownership or Company Name Fee

The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, and Part 4 with an application for changing the ownership or the name of the company.

10.5. Special Activity Fees

The permittee must pay the special activity fees specified in OAR 340-216-8020, Table 2, and Part 4 with an application to modify the permit.

11.0 DEQ CONTACTS / ADDRESSES

11.1. Business Office

The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:

Oregon Dept. of Environmental Quality
Financial Services – Revenue Section
700 NE Multnomah St., Suite 600
Portland, Oregon 97232-4100

11.2. Permit Coordinator

The permittee must submit all notices and applications that do not include payment to the Permit Coordinator.

Oregon Dept. of Environmental Quality
Western Region
Air Quality Permit Coordinator
4026 Fairview Industrial Drive SE
Salem, OR 97302-1142
wraqpermits@deq.state.or.us

11.3. Report Submittals

Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Region. If you know the name of the Air Quality staff member responsible for your permit, please include it:

Oregon Dept. of Environmental Quality
Western Region
4026 Fairview Industrial Drive SE
Salem, OR 97302-1142

11.4. Web Site

Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at www.oregon.gov/deq/.

12.0 GENERAL CONDITIONS AND DISCLAIMERS

12.1. Permitted Activities

- a. Until this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from the following:
 - i. Processes and activities directly related to or associated with the devices/processes listed in Condition 1.0 of this permit;
 - i. Any categorically insignificant activities, as defined in OAR 340-200-0020, at the source; and
 - ii. Construction or modification changes that are Type 1 or Type 2 changes under OAR 340-210-0225 that are approved by DEQ in accordance with OAR 340-210-0215 through 0250, if the permittee complies with all of the conditions of DEQ's approval to construct and all of the conditions of this permit.
- b. This permit does not authorize discharge of air contaminants from any other equipment or activity not identified herein.

12.2. Other Regulations

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

12.3. Conflicting Conditions

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. [OAR 340-200-0010]

12.4. Masking of Emissions

The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400]

12.5. DEQ Access

The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.

12.6. Permit Availability

The permittee must have a copy of the permit available at the facility at all times. [OAR 340-216-0020(3)]

12.7. Open Burning

The permittee may not conduct any open burning except as allowed by OAR 340, division 264.

12.8. Asbestos

The permittee must comply with the asbestos abatement requirements in OAR 340, division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.

12.9. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

12.10. Permit Expiration

- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit: [OAR 340-216-0082]
 - i. A timely and complete application for renewal of this permit or for a different ACDP has been submitted; or
 - ii. A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted; or
 - iii. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
- b. For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.

12.11. Permit Termination, Revocation, or Modification

DEQ may terminate, revoke, or modify this permit pursuant to OAR chapter 340 division 216. [OAR 340-216-0082].

13.0 EMISSION FACTORS

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
Boilers B-1 and B-2 (natural gas combustion)	PM/PM ₁₀ /PM _{2.5}	2.5	lbs/MMcf	DEQ AQ-EF05
	SO ₂	1.7		
	NO _x	100		
	CO	84		
	VOC	5.5		
Boilers B-1 and B-2 (#2 diesel at 0.5% SO ₂ , combustion)	PM	3.3	lbs/1000gallons	DEQ AQ-EF04
	PM ₁₀	2.3		
	PM _{2.5}	1.6		
	SO ₂	71.0		
	NO _x	20.0		
	CO	5.0		
	VOC	0.2		
Emergency Generator EG-1 (natural gas)	PM/PM ₁₀ /PM _{2.5}	10.0	lbs/MMcf	DEQ AQ-EF07
	SO ₂	0.6		
	NO _x	2840.0		
	CO	399.0		
	VOC	116.0		
Sports Drink Process Line SD-L (acetaldehyde) (uncontrolled)	VOC	0.71	lbs/lb	Material Usage
	HAP			

14.0 PROCESS/PRODUCTION RECORDS

Emissions device or activity	Process or production parameter	Frequency
Boilers B-1 and B-2	Amount of natural gas combusted	Monthly, annually
Boilers B-1 and B-2	Amount of #2 diesel combusted	Monthly, annually
Emergency generator EG-1	Hours of operation	Monthly, annually
Sports drink processing SD-L	Amount of acetaldehyde used	Monthly, annually

15.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O ₂	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Administrative Rules
AQMA	Air Quality Maintenance Area	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31 st	O&M	operation and maintenance
CAO	Cleaner Air Oregon	Pb	lead
CFR	Code of Federal Regulations	PCD	pollution control device
CO	carbon monoxide	PEMS	Predictive emission monitoring system
CO _{2e}	carbon dioxide equivalent	PM	particulate matter
DEQ	Oregon Department of Environmental Quality	PM ₁₀	particulate matter less than 10 microns in size
dscf	dry standard cubic foot	PM _{2.5}	particulate matter less than 2.5 microns in size
EPA	US Environmental Protection Agency	ppm	part per million
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
Gal	gallon(s)	PSEL	Plant Site Emission Limit
GHG	greenhouse gas	PTE	Potential to Emit
gr/dscf	grains per dry standard cubic foot	RACT	Reasonably Available Control Technology
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	scf	standard cubic foot
I&M	inspection and maintenance	SER	Significant Emission Rate
lb	pound(s)	SIC	Standard Industrial Code
MMBtu	million British thermal units	SIP	State Implementation Plan
NA	not applicable	SO ₂	sulfur dioxide
NESHAP	National Emissions Standards for Hazardous Air Pollutants	Special Control Area	as defined in OAR 340-204-0070
NO _x	nitrogen oxides	TACT	Typically Achievable Control Technology
NSPS	New Source Performance Standard	VE	visible emissions
NSR	New Source Review	VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



SIMPLE AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

OFD Foods, LLC, Plants 2 and 3
 525 25th Ave. SW
 Albany, OR 97322

Source Information:

SIC	4961 / 2034
NAICS	221330 / 311423
EPA ICIS-Air ID	

Source Categories (Table 1 Part, code)	B 13, 85
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	

Source test	
COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements

Annual report (due date)	15 Feb
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	
Other (specify)	

Air Programs

Synthetic Minor (SM)	X
SM -80	
NSPS (list subparts)	Dc (Boiler B-1)
NESHAP (list subparts)	ZZZZ
CAO	

NSR	
PSD	
GHG	
RACT	
TACT	

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PERMITTING

PERMITTEE IDENTIFICATION

1. Oregon Freeze Dry, LLC Plant 2 and 3 (OFD) operates a food preparation plant at 525 25th Avenue SW in Albany, Oregon. The company operates a similar facility at 770 West 29th Street in Albany. That facility is assigned to General Air Contaminate Discharge Permit (ACDP) - 011 under source number 22-8044.

PERMITTING ACTION

2. The proposed permit is a renewal of an existing Simple ACDP issued on February 27, 2015 and originally scheduled to expire on March 1, 2020. The permittee is on a Simple permit because the facility has a potential to emit more than 10 tons per year of at least one criteria pollutant and one hazardous air pollutant. No General ACDP is available. The existing ACDP remains in effect until final action is been taken on the renewal application because the permittee submitted a timely and complete application for renewal.
3. OFD has been determined to be an existing source for the purposes of Cleaner Air Oregon in accordance with OAR 340-245-0020 because the air quality permit application was submitted and deemed complete, or construction had commenced on this facility prior to November 16, 2018. As an existing source, the permittee is required to perform a risk assessment in accordance with OAR 340-245-0050, and demonstrate compliance with the Risk Action Levels for an “Existing Source” in OAR 340-245-8010 Table 1 when called in by DEQ. DEQ has not requested OFD to perform such a risk assessment.

OTHER PERMITS

4. Other permits issued by the DEQ for this source include:
NPDES 107264 (Storm Water)
NPDES 107264 (Non-Contact Water)

ATTAINMENT STATUS

5. The source is located in an attainment area for all criteria pollutants.
6. The source is not located within 10 kilometers of any Class I Air Quality Protection Areas.

SOURCE DESCRIPTION

OVERVIEW

7. OFD processes freeze dried fruits, vegetables, and other food products. The food products, packaged in cans or plastic-lined containers, are hermetically sealed. In addition, the facility makes a flavoring enhancer for the sports drink industry using a mixture of the polysaccharide maltodextrin and acetaldehyde. OFD does not produce the beverage, but provides a flavoring additive to the sports drink. Process steam is provided by two natural gas-fired boilers with diesel fuel back up. The facility began operation in 1981.
8. There have been no changes to the facility since the last permit renewal. However, OFD has a small natural gas-fired emergency generator subject to 40 CFR Part 63, Subpart 4Z that will be included as part of this renewal permit.

PROCESS AND CONTROL DEVICES

9. Existing air contaminant sources at the facility consist of the following:
 - a. Boiler B-1:
 - Manufacturer: Cleaver-Brooks
 - Manufactured date: 1990
 - Serial number: L-88519
 - Primary fuel: natural gas
 - Back-up fuel: #2 diesel
 - Heat input capacity: 14.7 MMBtu/hr. (natural gas); 104.5 gallons/hr. (diesel)
 - NSPS applicability: Yes (Dc)
 - NESHAP 6-J applicability: No
 - b. Boiler B-2:
 - Manufacturer: Cleaver-Brooks
 - Manufactured date: 1979
 - Serial number: L-67541
 - Primary fuel: natural gas
 - Back-up fuel: #2 diesel
 - Heat input capacity: 8.4 MMBtu/hr. (natural gas); 60 gallons/hr. (diesel)
 - NSPS applicability: No
 - NESHAP 6-J applicability: No

- c. Emergency Generator EG-1: Stationary RICE
- Manufacturer: Caterpillar
 - Manufactured date: 2004
 - Generator model: G30F3
 - Engine model: Ford ESG642, 4.2 L, V6
 - Primary fuel: Natural gas
 - Power rating: 69.6 bhp
 - NESHAP ZZZZ applicability: Yes
- d. Chamber stack (SD-L) that emits acetaldehyde from a sport drink flavoring agent production process installed in 1981.

COMPLIANCE HISTORY

10. The facility inspected on March 15, 2017, was found in compliance with all applicable permit conditions.
11. During the prior permit period there were no complaints recorded for this facility.
12. There have been no enforcement actions taken against this source since the last permit renewal.

EMISSIONS

13. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM	0	0	0	24	24	0
PM ₁₀	0	0	0	14	14	0
PM _{2.5}	NA	0	0	NA	9	0
SO ₂	0	0	0	39	39	0
NO _x	0	0	0	39	39	0
CO	0	0	0	99	99	0
VOC	0	0	0	39	39	0
GHG(CO ₂ e)	0	0	0	NA	74,000	0
Single HAP	0	0	0	9	9	0

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
Total HAPs	0	0	0	NA	24	0

- a. The netting basis is zero for Simple ACDPs in accordance with OAR 340-222-0040(3).
- b. This permit includes generic PSELs for all criteria pollutants.
- c. For Simple ACDPs, the proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with OAR 340-216-0064(3) (b).
- d. In order to maintain operational flexibility and to limit HAPs below Title V levels, the permittee has requested the Generic PSEL for HAPs be included.
- e. The basis for the criteria and HAPs PSELs is found in the emission detail sheet attached to the Review Report.
- f. The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

14. For each pollutant, the proposed Plant Site Emission Limit is less than the sum of the Netting Basis and the significant emission rate, thus no further air quality analysis is required at this time.

TITLE V MAJOR SOURCE APPLICABILITY

15. A major source is a facility that has the potential to emit 100 tons/year or more of any criteria pollutant or 10 tons/year or more of any single HAP or 25 tons/year or more of combined HAPs. This facility has the potential to be a major source of emissions. The basis for this determination is found in the emission detail sheet of this Review Report.
16. A source that has potential to emit at the major source levels, but accepts a PSEL or enforceable limit below major source levels is called a synthetic minor (SM). The source has the potential to emit HAPs at a major source level. It will accepted a generic PSEL below the major source level. The facility is considered a synthetic minor. The basis for this determination is found in the emission detail sheet of this Review Report.
17. A source that has the potential to emit at Title V major source levels but is willing to take a limit that is 80% or greater of the major source thresholds (e.g., 80 tons per year or greater for criteria pollutants) is called a synthetic minor 80 (SM-80). This source has the potential to emit HAPs above the major source threshold. It will accept a generic PSEL below the major source threshold that is not equal to or greater than 80% of major source

thresholds. The facility is not considered a SM-80. The basis for this determination is found in the emission detail sheet of this Review Report.

18. A source that has the potential to emit less than major source levels is a true minor source. This source is not a true minor. The basis for this determination is found in the emission detail sheet of this Review Report.

CRITERIA POLLUTANTS

19. This facility is not a major source of criteria pollutant emissions. The basis for this determination is found in the emission detail sheet of this Review Report.

HAZARDOUS AIR POLLUTANTS

20. This source has the potential to be a major source of hazardous air pollutants because it has the capacity to emit acetaldehyde (HAP) above the Title V major source threshold level. The facility has elected not to take an Oregon Title V Federal Operating Permit by requesting a PSEL below the major source thresholds levels. The PSEL is a federally enforceable limit. The basis for this determination is found in the emission detail sheet of this Review Report.

Hazardous Air Pollutants	Potential to Emit (pounds/year)	Actual Emissions (Average 2014-2018) (pounds/year)
Acetaldehyde	95,800	14,800
Total HAP emissions	95,800	14,800

CLEANER AIR OREGON

21. The Cleaner Air Oregon Toxic Air Contaminant emissions inventory for this source can be found on this website: https://www.deq.state.or.us/AQPermitsonline/22-8045-SI-01_ATEI_2016.PDF
22. OFD Foods, LLC has not been called in by DEQ and therefore, has not performed a risk assessment.

TOXICS RELEASE INVENTORY

23. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which DEQ has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities.

Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, [chemicals covered by the TRI Program](#) are those that cause:

- a. Cancer or other chronic human health effects;
 - b. Significant adverse acute human health effects; or
 - c. Significant adverse environmental effects.
24. There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical.
25. The TRI program does not cover OFD Foods, LLC because it does not manufacture process or use TRI-listed chemicals in quantities above threshold levels in a given year.

ADDITIONAL REQUIREMENTS

NEW SOURCE PERFORMANCE STANDARDS APPLICABILITY

26. 40 CFR Part 60, Subpart Dc is applicable to B-1 because it was manufactured after June 9, 1989 and has a maximum design heat input capacity between 10 million and 100 million Btu/hour.
27. 40 CFR Part 60, Subpart Dc is not applicable to B-2 because it was manufactured prior to June 9, 1989 and its maximum design heat input capacity is less than 10 MMBtu/hr.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS APPLICABILITY

28. Both B-1 and B-2 are exempt from 40 CFR Part 63, Subpart 6-J because they are fired on natural gas except during periods of curtailment in accordance with 40 CFR 63.11237 by meeting the definition of gas-fired boilers contained in the rule.
29. 40 CFR Part 63, Subpart 4-Z is applicable to EG-1, a natural gas-fired emergency generator, because it was manufactured before June 12, 2006.

GREENHOUSE GAS REPORTING APPLICABILITY

30. OAR Chapter 340 Division 215 is currently applicable to the source because emissions of greenhouse gases exceed 2,500 metric tons (2,756 short tons) of CO₂ equivalents per year.

REASONABLY AVAILABLE CONTROL TECHNOLOGY APPLICABILITY

31. The RACT rules are not applicable to this source because it is not in the Portland AQMA, Medford AQMA, or Salem SKATS.

TYPICALLY ACHIEVABLE CONTROL TECHNOLOGY APPLICABILITY

32. The source is likely meeting OAR 340-226-0130 Highest and Best Practicable Treatment and Control and Typically Achievable Control Technology (TACT) by:
 - a. Conducting pollution prevention activities such as combusting natural gas as the primary fuel to fire the boilers.
 - b. Limiting acetaldehyde emissions to under 10 tons per year.

SOURCE TESTING

33. There are no source testing requirements proposed for this facility during the permit cycle.

PUBLIC NOTICE

34. Pursuant to OAR 340-216-0064(4)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on Sept. 25, 2020 and the comment period will end on Oct. 26, 2020.**

PS: WK

ATTACHMENT A – DETAIL SHEETS

OFD Foods, LLC
 525 25th Avenue SW, Albany, OR
 Actual & Potential to Emit (PTE): Summary Page
 Criteria Pollutants & HAPs: Based on Usage from January 2014 - October 2018

22-8045

Pollutant	(tons / year)						
		Actual	PTE			PSEL	
PM		≤	0.26			24	
PM 10		≤	0.26			14	
PM 2.5		≤	0.26			9	
SO2		≤	0.45			39	
NOx		≤	10.22			39	
CO		≤	8.31			99	
VOC		7.95	* 48.45			39	
GHG		≤	11,937	(short tons/ year)		74,000	(short tons/ year)
Highest Single HAP (acetaldehyde, AA)		* 7.4	* 47.9			9	
Total Combined HAPs		7.40	47.90			24	

* The max. usage rate of AA at 185 lbs./ batch is 135,050 lbs./year. The source is taking a usage limit of 20,900 lbs./ year to maintain minor HAP source status.

OFD Foods, LLC 22-8045
 525 25th Avenue SW, Albany, OR
 Potential to Emit (PTE): Natural Gas Fired Cleaver-Brooks Boiler-1 with #2 Diesel Fuel Back-up

C-B #1
Heat Input Capacity Btu/ hr
14,600,000

Max. NG MMcf/ year
125

Pollutant	Tons/year
PM/PM10/PM2.5	0.16
SO2	0.11
NOx	6.23
CO	5.23
VOC	0.34

Fuel: Natural Gas	DEQ-AQ-EF05	Units
PM/PM10/PM2.5	2.5	lb/MMscf
SO2	1.7	lb/MMscf
NOx	100	lb/MMscf
CO	84	lb/MMscf
VOC	5.5	lb/MMscf

Conversion Factors	
1.0 cf NG =	1,027 Btu
1 year =	8760 hours
1 ton =	2,000 lbs.
1.0 MMcf =	1,000,000 cf

Total NG C-B 1 & 2 Boilers	
Pollutant	Tons/year
PM/PM10/PM2.5	0.25
SO2	0.17
NOx	9.81
CO	8.24
VOC	0.54

OFD Foods, LLC 22-8045
 525 25th Avenue SW, Albany, OR
 Potential to Emit (PTE): Natural Gas Fired Cleaver-Brooks Boiler-2 with #2 Diesel Fuel Back-up

C-B #2
Heat Input Capacity Btu/ hr
8,400,000

Max. NG MMcf/ year
72

Pollutant	Tons/ year
PM/PM10/PM2.5	0.09
SO2	0.06
NOx	3.58
CO	3.01
VOC	0.20

Fuel: Natural Gas	DEQ-AQ-EF05	Units
PM/PM10/PM2.5	2.5	lb/MMscf
SO2	1.7	lb/MMscf
NOx	100	lb/MMscf
CO	84	lb/MMscf
VOC	5.5	lb/MMscf

Conversion Factors	
1.0 cf =	1,027 Btu
1 year =	8760 hours
1 ton =	2,000 lbs.
1.0 MMcf =	1,000,000 cf

OFD Foods, LLC

22-8045

525 25th Avenue SW, Albany, OR

Potential to Emit (PTE): Natural Gas Fired Cleaver-Brooks Boiler-1 & 2 with #2 Diesel Fuel Back-up

C-B # 1	C-B # 2
104.5	60
gallons/hour	gallons/ hour

*# 2 Diesel fuel gallons/ year
7896

Pollutant	Tons/year
PM	0.01
PM 10	0.01
PM 2.5	0.01
SO2	0.28
NOx	0.08
CO	0.02
VOC	0.001

* Natural gas fired boilers not subject to NESHAP JJJJJ with diesel fuel back-up are allowed to burn diesel fuel up to 48 hours/ year for the purpose of testing and maintenance.

No operating limits apply to the boiler when using liquid fuel while under curtailment.

Fuel: #2 Diesel Fuel	DEQ-AQ-EF04	Units
PM	3.30	lbs./1000gal.
PM10	2.30	lbs./1000gal.
PM2.5	1.60	lbs./1000gal.
SO2	71.00	lbs./1000gal.
NOx	20.00	lbs./1000gal.
CO	5.00	lbs./1000gal.
VOC	0.34	lbs./1000gal.

OFD Foods, LLC
 525 25th Avenue SW, Albany, OR
 Potential to Emit (PTE): Natural Gas Fired Emergency Generator

Caterpillar G30F3 Emergency Generator	
462	* Manufactured
cuft/hr.	2004

Max. NG MMcf/ year
0.231
**Average use = 500 hours

Pollutant	Tons/year
PM/PM10/PM2.5	0.001
SO2	0.000
NOx	0.328
CO	0.046
VOC	0.013

* 40 CFR Part 63, Subpart ZZZZ is applicable to Caterpillar G30F3 emergency generator because it was manufactured before June 12, 2006. It is limited to 50 hours of on non-emergency use per year for the purpose of testing and maintenance. No operating limits apply to the generator when used during an emergency.

** Calculating Potential to Emit (PTE): The EPA & DEQ believe that 500 hours is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate under worst-case conditions.

Fuel: Natural Gas	DEQ-AQ-EF07	Units
PM	10.00	lbs/MMcf
PM10	10.00	lbs/MMcf
PM2.5	10.00	lbs/MMcf
SO2	0.60	lbs/MMcf
NOx	2840.00	lbs/MMcf
CO	399.00	lbs/MMcf
VOC	116.00	lbs/MMcf

OFD Foods, LLC **22-8045**
525 25th Avenue SW, Albany, OR
Actual & Potential to Emit (PTE): Sports Drink Processing
VOC & HAPs: Mass Balance Based on Usage from January 2014 - October 2018

Material	CAS-No.	Batches /day	lbs. of AA/ Batch	lbs. of AA/ year	EF lb/lbs used	PTE Pounds/ year	PTE Tons/ year	Actual Pounds/ year	Actual Tons/ year
Acetaldehyde (AA)	75-07-0	2	370	135050	0.71	95886	47.9		
		1	185	20900	0.71			14839	7.4

The max. usage rate of AA at 185 lbs./ batch is 135,050 lbs./year. The source is taking a usage limit of 20,900 lbs./ year to maintain minor HAP source status.

OFD Foods, LLC
525 25th Avenue SW, Albany, OR
Potential to Emit (PTE): GHG

22-8045

 This sheet calculates greenhouse gas emissions from fuel combustion. 1) Enter the combustion emission sources at the facility (e.g. "boiler 1") in the 1st column. 2) In the 2nd column, select the fuel type used in each emissions unit. If more than one fuel type was used in a single emissions unit, you must enter that same emissions unit on multiple rows and then enter the 3) Enter the fuel quantities in the 3rd column and specify the unit of measure in the 4th column. Emissions are then calculated in metric tons of carbon dioxide equivalent (mtCO₂e).

Enter emissions information				Convert to mmBtu				Emissions (kg/mm			CO ₂ Equivalent			Anthropogenic (mtCO ₂ e)			Biogenic (mtCO ₂ e)
Emissions unit ¹	Fuel Type ²	Quantity ³	Fuel units ³	HHV Units	HHV Unit	HHV	mmBtu	CH ₄	CO ₂	N ₂ O	CH ₄	CO ₂	N ₂ O	CH ₄	CO ₂	N ₂ O	(mtCO ₂ e)
C-B Boiler 1 & 2	Natural gas	197	Million cubic ft	197,000,000	cubic ft	0	202,122	0	53	0	25	1	298	5	10,725	6	0
C-B Boiler 1 & 2	Distillate oil 2	7,896	Gallon	7,896	gallon	0.14	1,090	0	74	0	25	1	298	0	81	0	0
E-gen G30F3	Natural gas	0.231	Million cubic ft	231,000	cubic ft	0	237	0	53	0	25	1	298	0	13	0	0
				0	0	0	0	0	0	0	25	1	298	0	0	0	0
				0	0	0	0	0	0	0	25	1	298	0	0	0	0
				0	0	0	0	0	0	0	25	1	298	0	0	0	0
				0	0	0	0	0	0	0	25	1	298	0	0	0	0
				0	0	0	0	0	0	0	25	1	298	0	0	0	0
				0	0	0	0	0	0	0	25	1	298	0	0	0	0

Anthropogenic combustion emissions (mtCO ₂ e):	10,829
Biogenic combustion emissions (mtCO ₂ e):	0
Total combustion emissions (mtCO₂e):	10,829

Conversion to short tons

Anthropogenic combustion emissions:	11,937
Biogenic combustion emissions:	0
Total combustion emissions:	11,937

Use the following formula to calculate a HHV for woodwaste on a wet basis:
 $HHV_w = (100 - M)/100 * 17.48$
 where HHV_w = wet basis HHV, M = moisture content (percent). 17.48 is the HHV on a dry basis.
 Use this new HHV to replace the default HHV in the calculator above once the "wood/woodwaste" fuel type is selected.