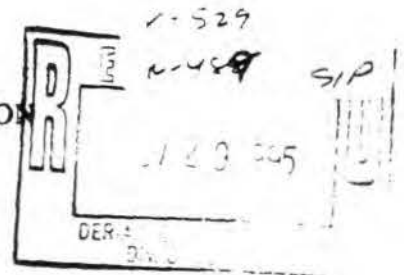


COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

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-19-0003</u>	Source &	<u>pet food processing and can</u>
Owner:	<u>Heinz Pet Products</u>	Air	<u>manufacturing facility, as</u>
		Cleaning	<u>described herein</u>
Address:	<u>6670 Low Street</u>	Device:	<u></u>
	<u>Bloomsburg, PA 17815</u>		<u></u>
Attn:	<u>Michael Hutnick</u>	Location:	<u>South Centre Township</u>
	<u>Environmental Manager</u>		<u>Columbia 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; EPA, REGION III
 - 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: NOV 27 1995

Expires: November 30, 2000



Environmental Program Manager

cc: Harrisburg
File

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3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations with respect to volatile organic compounds (VOCs) as required by Title I provisions of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following:
- a. two 26,600,000 BTU/hour natural gas/No. 6 fuel oil-fired Cleaver-Brooks model #CB2-32x600 industrial boilers.
 - b. one 53,000,000 BTU/hour natural gas/No. 6 fuel oil-fired E. Keeler model #DS-10-8 industrial boiler and two 50,300,000 BTU/hour natural gas/No. 2 fuel oil-fired Cleaver Brooks model #D-60-DH industrial boilers
 - c. one T-L Green Treats drying oven
 - d. 20 natural gas-fired space heaters
 - e. 34 propane fired forklifts
 - f. 4 propane fired carts
 - g. one propane fired floor scrubber
 - h. one 750 horsepower propane fired emergency generator
 - i. a spray nozzle cleaning station and use of organic solvent for general cleanup activities associated with the can side stripe coating operation
 - j. a cleaning operation associated with the can end sealing line
 - k. 10 Safety-Kleen solvent cleaning sinks
4. This operating permit also contains conditions restricting the operation of the sources identified in condition 3 a. through h. above such that the resultant nitrogen oxide (NO_x) emissions will be below the level which would subject the respective sources to the RACT requirements of 25 Pa. Code Sections 129.91 through 129.95 thereby creating a "synthetic minor" with respect to the facility's NO_x emissions.

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5. The expiration date shown in this operating permit is for state purposes. For federal enforcement purposes the conditions of this operating permit which pertain to the implementation of the RACT regulations shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA). The operating permit shall become enforceable by the U.S. EPA upon its approval of the above as a revision to the SIP.

Conditions 6 through 8 and 33 herein pertain to the establishment and maintenance of a NO_x RACT "synthetic minor".

6. The total combined nitrogen oxides (NO_x) emissions from all sources identified in conditions 3a, 3b, 3c, 3d, 3e, 3f, 3g and 3h herein, shall never exceed 100 tons per year.
7. The following restrictions shall be adhered to at all times:
- a. The total combined amount of No. 6 fuel oil burned in the 26,600,000 BTU/hour Cleaver-Brooks boilers identified in condition 3.a. herein and the 53,000,000 BTU/hour E. Keeler boiler identified in condition 3.b. herein shall never exceed 1,000,000 gallons per year.
 - b. The total amount of No. 2 fuel oil burned in the 50,000,000 BTU/hour Cleaver-Brooks boilers identified in condition 3.b. herein shall never exceed 150,000 gallons per year.
 - c. The total combined amount of natural gas burned in all boilers identified in conditions 3.a. and 3.b. herein shall never exceed 600,000,000 cubic feet per year.
 - d. The total combined amount of natural gas burned in the drying oven and 20 space heaters identified in conditions 3.c. and 3.d. herein shall never exceed 100,000,000 cubic feet per year.
 - e. The total combined amount of propane burned in the 34 forklifts identified in condition 3.e. herein, the four carts identified in condition 3.f. herein and the floor scrubber identified in condition 3.g. herein shall never exceed 200,000 gallons per year.
 - f. The 750 horsepower propane-fired emergency generator identified in condition 3.h. herein shall not be operated for more than 200 hours in any 12 month consecutive period.

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8. The company shall maintain records which, at a minimum, shall include:
- The total combined amount of No. 6 fuel oil used per calendar year in the 26,600,000 BTU/hour Cleaver-Brooks boilers and the 53,000,000 BTU/hour E. Keeler boiler.
 - The total amount of No. 2 fuel oil used per calendar year in the 50,300,000 BTU/hour Cleaver-Brooks boilers.
 - The total combined amount of natural gas used per calendar year used by all the boilers identified in conditions 3.a. and 3.b. herein.
 - The number of hours per calendar year that each of the boilers identified in conditions 3.a. and 3.b. herein is operated.
 - The total combined amount of natural gas used per calendar year used by the drying oven and 20 space heaters identified in conditions 3.c. and 3.d. herein.
 - The total combined amount of propane used per calendar year used by the 34 forklifts, 4 carts and the floor scrubber identified in conditions 3.e., 3.f. and 3.g. herein.
 - The number of hours per calendar year that the 750 horsepower emergency generator identified in condition 3.h. herein is operated.

Conditions 9 through 14 and 33 herein pertain to the establishment and maintenance of RACT for VOCs from the sources identified in condition 3 herein.

9. The potential to emit volatile organic compounds from each of the following source categories shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year (as determined by the Department). Should any of these limitations ever be exceeded for any of the source categories listed below, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source contained in the respective source category.
- a. the T-L Green Treats drying oven
 - b. the 20 natural gas-fired space heaters
 - c. the 34 propane fired forklifts, the 4 propane fired carts and the propane fired floor scrubber
 - d. the 750 horsepower propane fired emergency generator

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10. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, RACT with respect to the VOC emissions from the two 26,600,000 BTU/hour Cleaver-Brooks boilers, the 53,000,000 BTU/hour E. Keeler boiler and the two 50,300,000 BTU/hour Cleaver-Brooks boilers shall be compliance with the NO_x RACT synthetic minor requirements contained in conditions 6, 7 and 8 herein.
11. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations, RACT for the can side stripe coating operation nozzle cleaning station and use of VOC-containing solvent for general side stripe coating operation cleanup activities shall be compliance with conditions 25, 28, 29 and 30 herein.
12. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, no VOC-containing solvents shall be used to clean anything relating to the can end sealing line identified in condition 3j herein.
13. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, RACT for the 10 Safety-Kleen solvent cleaning sinks identified in condition 3k herein shall be the continued use of Solvent 150 (or alternate solvent of equivalent, or lesser, volatility).
14. The company shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code Section 129.95 which, at a minimum, shall include:
 - For the spray nozzle cleaning station and general cleanup activities identified in condition 3.i. herein, the company shall comply with the applicable recordkeeping requirements of condition 31 herein.
 - For the cleanup operations identified in condition 12 herein, the company shall maintain records of the use of any VOC-containing cleanup solvents.
 - For the 10 Safety-Kleen sinks identified in condition 13 herein, the company shall maintain records of the amount of Safety-Kleen Solvent 150 (or any other organic solvent used in this operation) used in this operation, as well as, any spent solvent from the sinks which is shipped off site as liquid waste.

These records shall be retained for a minimum of two years and shall be made available to the Department upon request. The Department reserves the right to expand the list contained in this condition.

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~~Conditions 15 through 24 and 33 herein pertain to the boilers identified in condition 3.a. and b. herein which previously operated pursuant to operating permit 19-302-009C (which is hereby being superseded by the issuance of this PACT operating permit).~~

- ~~15. This operating permit is issued for the operation of 2 Cleaver Brooks D-60-RH natural gas/#2 oil-fired boilers as well as for the operation of two older Cleaver Brooks natural gas/#6 oil-fired boilers and one E. Keeler natural gas/#6 oil-fired boiler.~~
- ~~16. The sulfur content of the #6 oil-fired in the two older Cleaver Brooks boilers and the E. Keeler boiler shall not exceed 2.8% (by weight). The #2 oil fired in the two Cleaver Brooks D-60-RH boilers shall not exceed .5% (by weight). None of the boilers shall fire any oil to which reclaimed or waste oil or other waste materials have been added.~~
- ~~17. The combined sulfur oxides emissions from the two older Cleaver Brooks boilers and the E. Keeler boiler shall not equal or exceed 250 tons per calendar year (as calculated by the Department).~~
- ~~18. The combined sulfur oxides emissions from the two Cleaver Brooks D-60-RH boilers shall not equal or exceed 250 tons per calendar year (as calculated by the Department).~~
- ~~19. The combined sulfur oxides emissions from all five boilers shall not equal or exceed 254.9 tons per calendar year (as calculated by the Department).~~
- ~~20. The company shall maintain an accurate record of the dates and sizes (gallons) of all fuel oil (#6 and #2) deliveries made to the plant. It will also have available an analysis of oil sulfur content for each truckload of oil delivered using an analytical method which is acceptable to the Department. All of this information shall be submitted to the Department on a quarterly basis and shall be due within 30 days of the end of the respective calendar quarter (due on April 30, July 30, October 30 and January 30).~~
- ~~21. The company shall submit any additional oil analyses or samples which may be requested by the Department.~~
- ~~22. The company shall not burn fuel oil in any boiler or other piece of equipment in the plant, other than the two Cleaver Brooks D-60-RH boilers and the other three boilers identified above, unless Department approval to do so has first been obtained.~~

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- ~~23. The operation of the aforementioned boiler(s) shall not at any time result in the emission of visible air contaminants in excess of the limitations specified in Section 123.41, sulfur oxides in excess of the limitations specified in Section 123.22 or particulate matter in excess of the limitations specified in Section 123.11, all sections of Chapter 123 of Article III of the Rules and Regulations of the Department of Environmental Protection, or in the emission of either 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 or in the emission of any air contaminant in excess of the limitations specified in any condition contained herein or in Subpart Dc of the Federal Standards of Performance for New Stationary Sources, 40 CFR 60.40c-60.48c.~~
24. The two Cleaver Brooks D-60-RH natural gas/#2 oil-fired boilers are subject to Subpart Dc of the Federal Standards of Performance for New Stationary Sources, 40 CFR 60.40c-60.48c. The company shall comply with all applicable requirements of this Subpart as well as any other applicable Subpart of the Standards of Performance, including any recordkeeping and reporting requirements. Pursuant to 40 CFR 60.4 of the Standards of Performance, the submission of all requests, reports, applications, submittals and other communications required by the Standards of Performance must be made to both the Department of Environmental Protection and the Environmental Protection Agency. The Environmental Protection Agency copies may be sent to:

Director
Air, Toxics and Radiation Division
U.S. EPA, Region III
841 Chestnut Street
Philadelphia, PA 19107

Conditions 25 through 33 herein pertain to the side stripe coating operation spray nozzle cleaning station and general side stripe coating operation itself. These sources were previously operated pursuant to operating permit 19-318-016 which is being superseded by the issuance of this RACT operating permit.

25. This operating permit is issued for the operation of a can side stripe surface coating operation consisting of a coating application station, a curing oven and a spray nozzle cleaning station. The volatile organic compound emissions from this side stripe coating operation, including the spray nozzle cleaning station, are controlled by a CSM Environmental Systems model 25A Torvex catalytic fume incinerator.

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26. Pursuant to the best available technology provisions of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the coating used in the side stripe coating operation shall be limited to Valspar 9849-501 having the composition identified in Valspar's Material Safety Data Sheet and "Coating Supplier Environmental Data Sheet" dated 4/15/93 unless an alternate coating, or alternate composition of this coating, is approved by the Department. The side stripe coating material, as received from the vendor, shall not be thinned, reduced or otherwise modified prior to use.
27. The catalytic fume incinerator shall be equipped with an operable continuous catalyst inlet and outlet temperature monitoring and recording system which shall be operated at all times that the incinerator is in use. The temperature records generated by this monitoring and recording system shall be maintained on site for at least 2 years and shall be provided to the Department upon request.
28. Pursuant to the best available technology provisions of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the catalyst outlet temperature shall be maintained at 800°F or greater at all times that the side stripe coating operation is in use (including the nozzle cleaning station).
29. Pursuant to the best available technology provisions of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the catalytic fume incinerator shall maintain a volatile organic compound destruction efficiency of at least 95% and the volatile organic compound capture system and catalytic fume incinerator shall, in combination, maintain an overall volatile organic compound reduction efficiency of at least 85%.
30. Pursuant to the best available technology provisions of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Resources, no more than 100 gallons of cleaning solvent shall be used per year for side stripe coating operation cleanup activities performed outside of the nozzle cleaning station fume hood unless the cleaning solvent used in the subject activities is captured and disposed of in liquid form. Chlorinated solvents shall not be used as cleaning solvents.
31. The company shall maintain comprehensive accurate records of the amount of side stripe coating material and cleaning solvent used in the side stripe coating operation per calendar year as well as the amount of spent cleaning solvent from this operation which is shipped off site in liquid form and shall make this information available to the Department upon request.
32. The operation of the side stripe coating operation shall not at any time result in non-compliance with any condition contained herein or in the emission of volatile organic compounds in excess of the limitations specified in Section 129.52 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection or in the emission of these contaminants 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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33. The company shall immediately notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants 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 or specified in any applicable requirement of Subpart Dc of the Federal Standards of Performance for New Stationary Sources, 40 CFR 60.40c-60.48c.
34. This operating permit is valid for a limited period of time and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Resources. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania - Clean Air Fund". The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than November 1, 2000.

Additional annual operating permit administration fees may also be required pursuant to Section 127.703. If required, these fees are to be paid by no later than 11/30/96, 11/30/97, 11/30/98 and 11/30/99. The administration fee is to be submitted with an Annual Operating Permit Administration Fee Transmittal form.

35. Any notification required as a result of any condition herein should be directed to: Larry Strauss, Air Quality Specialist, 208 West Third Street, Suite 101, Williamsport, PA 17701-6448, telephone (717) 327-3641.

